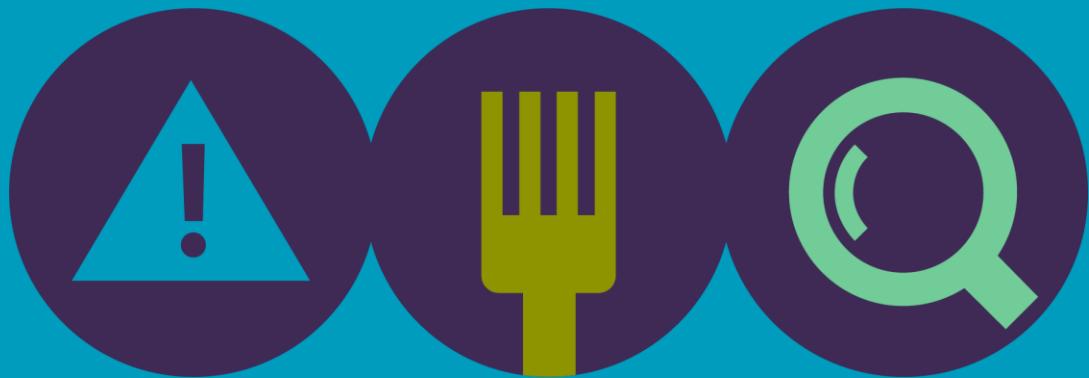


# **FSS Food Crime Control Strategy 2022-25**

**October 2022**



# Table of Contents

1. Purpose .....	3
2. Methodology .....	4
3. Crime Techniques .....	5
4. Three Lines of Defence .....	6
5. Detect, Disrupt, Deter and Divert .....	7
6. Food Crime Priorities .....	8
6.1 Traceability across the Meat supply chain .....	9
6.1.1 Rationale .....	9
6.1.2 Potential Risks .....	9
6.1.3 Key Intelligence Requirements .....	9
6.1.4 Next Steps .....	9
6.2 Traceability across the Seafood supply chain .....	10
6.2.1 Rationale .....	10
6.2.2 Potential Risks .....	10
6.2.3 Key Intelligence Requirements .....	10
6.2.4 Next Steps .....	10
6.3 Tackling food crime in the Alcohol supply chain .....	11
6.3.1 Rationale .....	11
6.3.2 Potential Risks .....	11
6.3.3 Key Intelligence Requirements .....	11
6.3.4 Next Steps .....	11
6.4 Imported foods from supply chains of high risk .....	12
6.4.1 Rationale .....	12
6.4.2 Potential Risks .....	12
6.4.3 Key Intelligence Requirements .....	12
6.4.4 Next Steps .....	12
7. Emerging Risks .....	13
8. Thematics .....	13
9. Next Steps .....	13
10. Contact Us .....	14
Version Control .....	14
Abbreviations .....	14

# 1. Purpose

Food Crime is defined as 'serious fraud and related criminality within food supply chains'. It is a financially motivated crime that can have serious health impacts on consumers where through deceptive practices products have been adulterated, substituted or their authenticity has been misrepresented. The economic impact on the UK is likely to be substantial to both the consumer and to industry.

The Scottish Food Crime & Incidents Unit (SFCIU) is a branch within Food Standards Scotland (FSS) which takes the lead role in the investigation of food crime. As part of this effort the Control Strategy 2022-25 outlines the food crime priorities and actions being taken to prevent food crime, detect and deter criminality and prosecute offenders.

The Control Strategy looks to manage the threat of food crime and set out a clear path in what is a complex and challenging area. This work assessed information and intelligence from a range of sources and was supported by contributions from partner agencies and industry.

Intelligence and investigations have highlighted that due to the risk a continued focus on the tangible threat which food crime poses to Scotland, both domestically and overseas, is fully justified.

The **Divert, Deter, Detect and Disrupt** framework, as utilised by the Scottish Government in their Serious Organised Crime (SOC) strategy, has been adopted by FSS to outline the key strategic objectives in the approach to tackling food crime.

## 2. Methodology

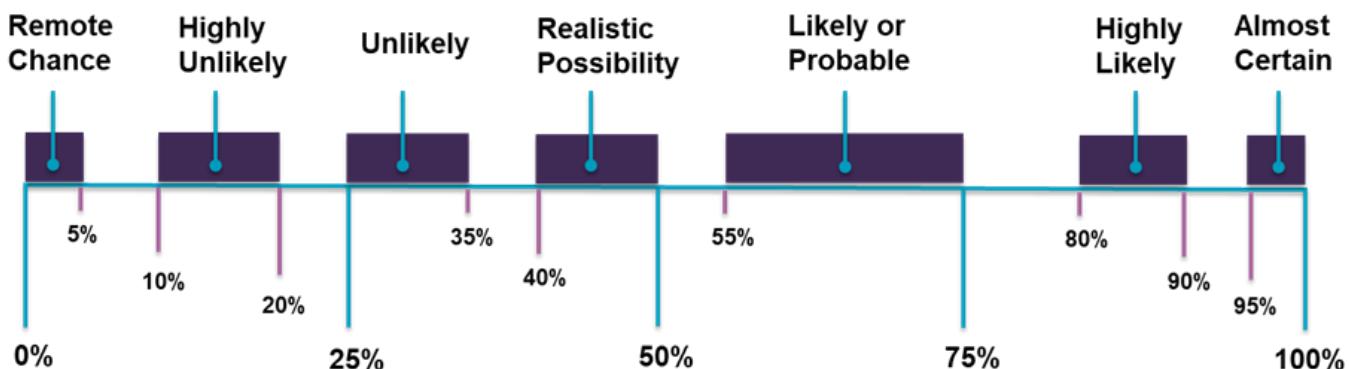
The Control Strategy has focused on commodities assessed as high risk and specific elements of the supply chain vulnerable to food crime as part of directing intelligence gathering and investigative efforts. These supply chains can be complex and work will look to develop a greater understanding of the risks, vulnerabilities and threats represented by food crime to take preventive and enforcement action with these priorities.

The MoRiLE (Management of Risk in Law Enforcement) matrix was used to take a consistent approach when comparing commodities and areas of risk to understand the scale of physical harm, breadth of issue and severity of impact.

A number of thematic areas will also be assessed on a long term basis to better understand the changing food sector and impact of food crime as part of improving strategic objectives.

Intelligence assessments have been defined using the 'probability yardstick' as defined by the Professional Head of Intelligence Assessment (PHIA) to ensure consistency across different threats when assessing probability.

### Probability Yardstick



### 3. Crime Techniques

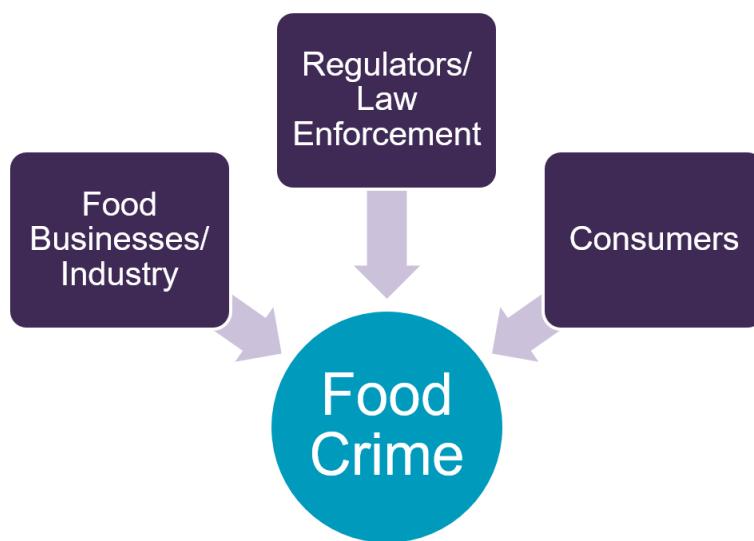
The following are seven techniques, along with the enabling crime of document fraud, which represent food crime. These help to identify and target the work of SFCIU and outline the significant threat to the supply chain where these techniques can be employed from a low level to a substantial scale.

SFCIU are mindful that non-compliances can often be indicators of food crime, particularly where there are identified patterns in behavior, and these continue to be monitored.

Crime Technique	Definition
<b>Theft</b>	The dishonest appropriation of food, drink or feed products from their lawful owner with an intention to benefit economically from their subsequent use or sale
<b>Unlawful Processing</b>	The slaughter, preparation or processing of products of animal origin outside of the relevant regulatory framework
<b>Waste Diversion</b>	The unauthorised diversion of food, drink or feed intended for disposal back into relevant supply chains
<b>Adulteration</b>	Reducing the quality of a food product through the inclusion of a foreign substance, with the intention either to make production costs lower, or apparent quality higher
<b>Substitution</b>	Replacing a food product or ingredient with another substance of a similar but inferior kind
<b>Misrepresentation of origin, quality, provenance or benefits</b>	The marketing or labelling of a product so as to inaccurately portray its quality, safety, benefit, origin or freshness
<b>Misrepresentation of durability date</b>	The false declaration of the freshness, or expiration date, of a product
<b>Document Fraud</b>	The use of false or misappropriated documents to sell, market or otherwise vouch for a fraudulent or substandard product

## 4. Three Lines of Defence

The threat to Scotland-based consumers and industry takes many forms and varies from low level criminality to complex fraud across supply chains. As part of tackling food crime there are three key lines of defence that can support in ensuring that food is both safe and authentic.



These lines of defence contribute to the following:

- Raising awareness of food crime
- Developing the intelligence picture
- Sharing intelligence and information with partners
- Identify instances of criminality
- Support investigations, including multi-agency collaboration
- Prevention and enforcement activity
- Prosecution of offenders
- Development of fraud prevention technologies
- Supply chain surveillance

It should also be acknowledged the contribution that academia offers in understanding food crime, addressing challenges and presenting options for industry and regulators to enhance resilience within supply chains.

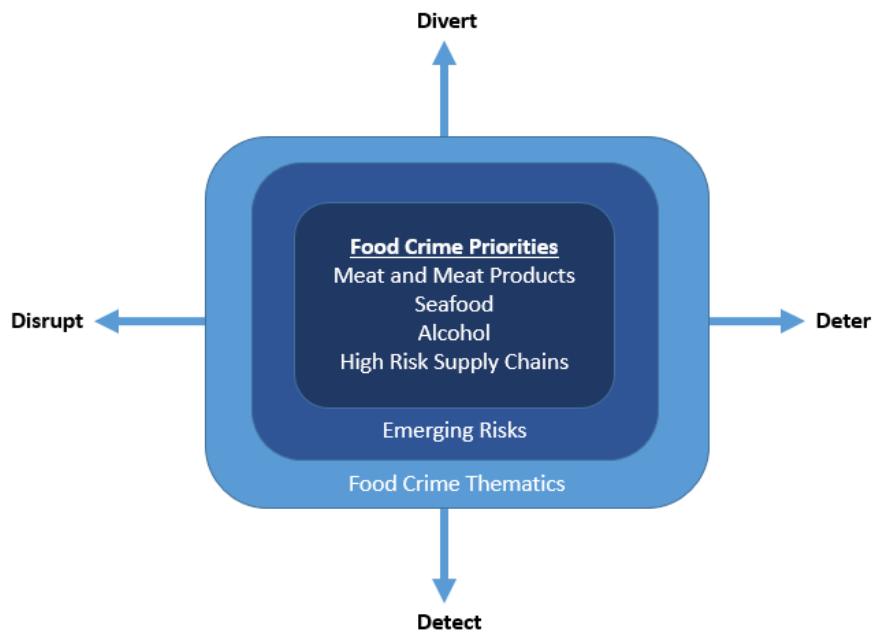
## 5. Detect, Disrupt, Deter and Divert

As part of tackling food crime FSS focuses on four key objectives: Divert, Deter, Detect and Disrupt. These are relevant for each food crime priority and support in ensuring that food is both safe and authentic. The table below sets a framework for strategic actions over the reporting period to continue efforts to identify, understand and tackle food crime, providing an overarching strategic approach to managing the food crime priorities.

<b>Detect</b>	<b>Disrupt</b>	<b>Deter</b>	<b>Divert</b>
Identify opportunities to gather intelligence and detect food crime across the supply chain	Undertake intelligence-led multi-agency actions to target, mitigate and tackle threats	Work alongside partners and industry to ensure a hostile environment for criminals to operate in	Identify opportunities to implement prevention strategies with partners and industry
Target individuals, groups and/or businesses involved in fraudulent activity using all available powers	Share intelligence and analytical products with partners to enhance assessments and identify disruption opportunities	Prosecution of illegal activity through use of appropriate legislation	Publicise prosecutions, interventions, enforcement actions and the risks to consumers
Undertake analysis of information, data and intelligence to identify trends, patterns and emerging risks within the food industry	Utilise existing legislation available to the organisation and partners to seek positive outcomes	Continue to raise food crime as a national issue to ensure awareness and deter those who may become involved in this activity	Raise awareness of the repercussions of prosecution, potential for financial loss and reputational damage

Communication and prevention strategies will be fundamental in delivering the objectives for each priority, particularly in raising awareness of food crime and reducing the space and opportunity for those committing food crime in the long term.

## 6. Food Crime Priorities



The FSS food crime priorities were identified using recognised risk matrix criteria to outline the scale of physical harm, breadth of issue and severity of impact to consumers and industry. The matrix was used to assess data, information and intelligence gathered from various sources, including partners and industry, to give a comparable analytical approach to assessing commodities.

The priorities identified reflect where there is a heightened level of threat and risk that requires:

- Intelligence Development
- Engagement with industry
- Liaison and joint responses with partners
- Awareness raising of issues
- Prevention & Enforcement Strategies

It is highly likely that there is food crime taking place within the sectors of interest based on the current intelligence assessment but gaps continue to exist in understanding the scale of these activities. Identifying and understanding food crime has many challenges, particularly where intelligence is limited, extremely sensitive or difficult to obtain.

All intelligence or risks related to food crime will receive the same level of scrutiny and assessment.

## 6.1 Traceability across the Meat supply chain

### 6.1.1 Rationale

The meat sector has been exploited in the past and continues to be targeted by criminals across the supply chain. It is highly likely that food crime is taking place in this sector but it is challenging to understand the scale of those criminal activities. Concerns in relation to fraudulently tagged livestock, misrepresentation of meat and meat products either by origin or durability date and also through substitution continue to be present. This is a key sector for Scotland both in terms of economy and reputation but is vulnerable in a number of areas that require on-going intelligence development, investigation and prevention activities.

### 6.1.2 Potential Risks

- Fraudulent use of ID tags, cattle passports, accreditation etc.
- Mislabelling of durability date
- Other origin meat sold as Scottish
- Lower quality product misrepresented as premium
- Stolen livestock
- Illegal slaughter
- Animal-By Product
- Food crime occurring in other meat products such as ready meals

### 6.1.3 Key Intelligence Requirements

- Details of individuals/groups known or suspected to be involved in livestock theft and/or illegal slaughter
- Routes of entry for stolen and/or illegally slaughtered livestock into supply chain, including cross-border movements
- Prevalence of imported meat sold as Scottish or lower quality product misrepresentation as premium
- Identify significant instances of meat substitution

### 6.1.4 Next Steps

- Continue to work alongside key partners to share intelligence and identify opportunities to take both preventative and enforcement action
- Increase and develop intelligence to outline the type, scale and frequency of food crime within the meat sector to better understand the potential risks
- Mapping of supply chain routes to identify vulnerabilities, intelligence gaps and enforcement opportunities
- Undertake sampling and traceability initiatives based on analysis and intelligence to verify and enforce the authenticity of supply chains

## 6.2 Traceability across the Seafood supply chain

### 6.2.1 Rationale

The seafood industry represents a significant market for Scotland and ensuring it is free from food crime is pivotal for its reputation and continued prosperity. Reporting continues to suggest a threat to the sector not only from those operating in and around Scotland but from imported products. The scale and nature of the seafood sector means that identifying food crime can often be challenging and requires support from partners and industry. Due to the current economic pressures the likelihood of food crime has increased across the supply chain with the potential for low level criminality to complex fraud. Scottish businesses and consumers are faced with potential varying degrees of food crime such as purchasing substituted or mislabelled product in relation to date, quality or origin. Work with industry has opened a number of potential opportunities for both intelligence development and enforcement actions. The intelligence picture in Scotland continues to develop but it is also clear from global perspective the number of areas of concern that may impact the supply chain.

### 6.2.2 Potential Risks

- Lower quality product misrepresented as premium
- Misrepresentation of origin, in particular salmon
- Importation of illegally treated tuna
- Fraudulent use of official certification in UK and elsewhere

### 6.2.3 Key Intelligence Requirements

- Identify other origin salmon sold as Scottish
- Establish if illegally treated tuna continues to be supplied to Scotland
- Establish the scale of the substitution of premium fish for lower quality
- Identify prevalence of fraudulent use of certification in UK and elsewhere relating to Scottish supply chain
- Identify those individuals/businesses involved in food crime associated with the fish sector

### 6.2.4 Next Steps

- Work with industry to seek collaborative initiatives in tackling fraudulent products entering the market
- Continue efforts with other European countries to tackle concerns relating to illegally treated tuna on the market
- Raise seafood fraud with the Global Alliance on Food Crime to drive forward the agenda at an international level
- Increase and develop intelligence to outline the type, scale and frequency of food crime within a number of key seafood sectors
- Undertake sampling and traceability initiatives based on analysis and intelligence to identify and verify areas of concern in the seafood supply chain

## 6.3 Tackling food crime in the Alcohol supply chain

### 6.3.1 Rationale

It is assessed as highly likely that counterfeit alcohol is being sold in Scotland. There is a public safety concern which warrants continued intelligence gathering and investigation resources to understand the scale of activity in Scotland and mitigate criminality taking place. Further work is required to identify individuals and groups involved in the production, facilitation and sale of counterfeit alcohol fraudulently branded as genuine product. Although vodka products remain the prime area of concern there is a need to establish the level of criminality related to other alcoholic beverages.

### 6.3.2 Potential Risks

- Counterfeit alcohol entering Scotland via Northern Ireland
- Importation or smuggling of counterfeit vodka into Scotland
- Production of counterfeit alcohol in Scotland
- Sale of counterfeit wine and spirits in Scotland
- Importation and use of material and equipment to facilitate counterfeit alcohol production

### 6.3.3 Key Intelligence Requirements

- Any intelligence of counterfeit alcohol produced in Scotland
- Names of individuals known or suspected to be involved in the production, facilitation and sale of counterfeit alcohol in Scotland
- Scale and frequency of counterfeit alcohol entering or transiting via Scotland
- Scale of counterfeit wine and spirits being produced and/or sold in Scotland

### 6.3.4 Next Steps

- Identify opportunities to work in collaboration with partners to identify and tackle counterfeit/illicit alcohol supply chains
- Increase and develop intelligence to outline the scale and frequency of counterfeit/illicit alcohol production, distribution and sale in Scotland
- Seek opportunities to take an intelligence-led approach for sampling products on the market to ensure their authenticity
- Work with industry to raise awareness of FSS and need for intelligence on counterfeit/illicit alcohol

## 6.4 Imported foods from supply chains of high risk

### 6.4.1 Rationale

Work with partners and industry continues to indicate concern in relation to imported products from supply chains assessed as high risk. These relate to commodities where there are increased vulnerabilities in relation to their authenticity due to supply routes presenting a heightened potential for food crime. The challenges and complex factors influencing the global supply chain require a greater surveillance of supply chains entering the UK to assess, detect and prevent food crime occurring. The level and scale of food crime at an international level highlights concerns in relation to presence of SOCs and with changing trading relations the potential exposure of the UK to this criminality.

### 6.4.2 Potential Risks

- UK importing food, drink and animal feed which are inauthentic, mislabelled or counterfeit
- Inauthentic, mislabelled or counterfeit foods are transiting Scottish ports undetected and entering the supply chain
- Impact of global disrupters that increases the vulnerability of Scottish supply chains to food crime and food safety
- Businesses facing risk through supply chain disruptions, market pressures and economic challenges which may increase their vulnerability to inauthentic, mislabelled or counterfeit commodities

### 6.4.3 Key Intelligence Requirements

- Develop an enhanced understanding of Scottish supply chains and high risk commodities as part of directing resources
- Names of businesses which are involved in or facilitate the supply of inauthentic, mislabelled or counterfeit food into the UK
- Industry to set out list of imported foods which they assess are at risk from food crime

### 6.4.4 Next Steps

- Deliver profiles on supply chains of high risk and undertake targeted sampling of commodities to identify and assess risk
- Work with industry to identify vulnerable supply chains and emerging risks as part of taking preventative action to enhance the response to food crime
- Work with Local Authorities and industry to understand and assess the challenges being faced in relation to imported foods as part of delivering preventative outcomes
- Work with other regulators through current processes at a global level to identify supply chains of high risk as part of taking preventative action

## 7. Emerging Risks

FSS undertakes horizon scanning and emerging risk analysis which supports in identifying new or recurring risks and vulnerabilities in the supply chain. This work contributes to directing resources, taking preventative action and contributing to the long term strategic direction of food crime priorities and theamics.

## 8. Thematics

The theamics are a longer term view of the challenges and risks in the supply chain from food crime. They look to acknowledge the complex nature of the supply chains, understand the involvement of criminals with the supply chain and opportunity for food crime, assess factors which threaten or disrupt supply chains and seek to develop prevention approaches to these challenges.

### **Food Crime Prevention**

Deliver a long term prevention strategy that is reflective of current, emerging and potential future issues in relation to food crime and the supply chain. Working with industry and partners will continue to form a key part of delivering on this work.

### **Global Supply Chain Disrupters**

Understand the impact of current, emerging and future risks impacting on the global supply chain as part of identifying how food crime will manifest and affect Scottish businesses and consumers.

### **Authenticity and Traceability in the Supply Chain**

Analyse issues such as the misrepresentation of premium status of products including organic, fraud-linked to allergens and plant-based ingredients.

### **Criminal Profiling, Activity and Networks**

Deliver analysis on those involved in food crime as part of understanding the nature and type of the criminality taking place to support in directing SFCIU resources to the threat.

### **E-commerce**

Assess how E-commerce is being utilised to commit food crime and deliver preventative measures for industry and consumers to ensure food is safe and authentic.

## 9. Next Steps

Over the next year actions outlined in the Control Strategy will be taken forward. This is part of ensuring that food is safe and authentic for consumers and that all available powers are used against those committing food crime.

The food crime priorities are reviewed on a yearly basis to report activity and ensure FSS continue to be focused on the key threats and any emerging risks.

Updates on the progress of the Control Strategy are presented to a Strategic Group on a 6 monthly basis. The Control Strategy will be updated to reflect this review.

## 10. Contact Us

As part of the three lines of defence, whether you are a member of the public or working within the food and drink sector you can report food crime in one of the following ways:

Call the Scottish Food Crime Hotline ([0800 028 7926](tel:08000287926)), in partnership with Crimestoppers. The hotline is free and confidential.

You can also submit information using the [online web form](#)

SFCIU can be contact at [foodcrime@fss.scot](mailto:foodcrime@fss.scot)

### Version Control

Version	Date	Last review carried out	Next review due	Comments
1.0	October 2022		March 2023	

### Abbreviations

<b>FSS</b>	Food Standards Scotland
<b>MoRiLE</b>	Management of Risk in Law Enforcement
<b>PHIA</b>	Professional Head of Intelligence Assessment
<b>SFCIU</b>	Scottish Food Crime and Incidents Unit
<b>SOC</b>	Serious Organised Crime