An update on food crime since the Elliott Review
In 2013, horse DNA was detected in our beef supply systems. The Government asked Professor Chris Elliott to review the integrity and assurance of our food supply network in the wake of this finding. The final Report of the Elliott Review, published in September 2014, revealed food crime occurs on a grand scale, affecting most, if not all food products, suppliers and retailers at sometime or other.1

Professor Elliott asked Kate Cooper to help him draw up a case study of how a major UK city could tackle food crime just before the publication of his draft Review in late 2013.

The Professor’s request led to a workshop held in Birmingham co-hosted with the Elliott Review Team in April 2014. Some 40 participants came from across the city’s food supply network, with representatives from SMEs including takeaways, large food companies, Birmingham Environmental Health and Trading Standards, West Midlands Police, food bank providers and a charity for the young homeless and academics with relevant expertise.

This workshop resulted several organisations offering their services to tackle food crime: Birmingham City Council, Aston University (specifically, their substantial capabilities in data mining) and the Food Safety Group at University of Birmingham (providers of education and training programmes in environmental health). The then-newly incorporated Birmingham Food Council also pledged its support to maximise its influence in tackling food crime. The workshop and its outcomes featured as Annex N in the Professor’s final report.2

In December 2014, the Birmingham Food Council Board invited Professor Elliott back to the city. He joined Nick Lowe from Birmingham Environmental Health and other professionals with relevant skills to discuss with the Board both the national and international situation, and what is happening locally in relation to tackle food crime.

This report summaries the presentations by Professor Elliott and Nick Lowe, and the subsequent conversation at that December meeting.

Chair, Birmingham Food Council

May 2015

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2 As well as Annex N, see also the Elliott Review: Birmingham (2014). Kate led this work through The New Optimists (a thinktank of regional scientists and others that she founded in 2011). Although this consultation exercise began before the Birmingham Food Council was set up, we were able to contribute to the latter part of it.
Summary of the December meeting

Contributors

✦ Stewart Davies, Chemistry Manager at Birmingham City Laboratories
✦ Professor Chris Elliott of Queens University Belfast, Director of the Institute for Global Food Safety and Chair of the Elliott Review
✦ Frank Hollywood, Public Analyst and Head of Scientific Services at Staffordshire County Council
✦ Nick Lowe, Birmingham Environmental Health Operations Manager: Food Safety
✦ Ian Nabney, Professor of Computer Science and Head of Mathematics at Aston University

and the Birmingham Food Council Board members:
✦ Kate Cooper, Chair and founder of *The New Optimists*
✦ Caroline Hutton, Director of Martineau Gardens
✦ John Middleton, Vice President of the UK Faculty of Public Health
✦ Jim Parle, Professor of Primary Care at Birmingham Medical School
✦ Caroline Wolhuter, Head of Social Inclusion at Ashram Housing Association

Also present were Su Balu, Secretary to the Birmingham Food Council Board, Alex Clark of the University of Warwick (note-taker) and Steph Jennings (social media reporter from Podnosh).

We received apologies from Dan Edwards from the Food Safety Group at the University of Birmingham.

A synopsis of Professor Elliott’s presentation

The Professor began by saying he was pleased to report to us that some effective reforms and initiatives had been put in place since the publication of his final report in September 2014, and that he had taken part in some 35 stakeholder events since then.

**Horsegate**

The Elliott Review was triggered by horse DNA found in beef products. 26 out of the 27 EU Member States were affected.

The Review uncovered a plethora of food fraud across the industry, implicating many food outlets from the small corner shop to big supermarkets. The common denominators were complex supply chains and a ‘race to the bottom’ on price. Governments had been relatively unaware of criminal activity in food supply systems.

In the UK, there is no evidence of any deaths or illnesses resulting from the horse meat scandal, but the lack of reliable data means we cannot know for certain. Cultural taboos we currently have around eating horse meat means ‘horsegate’ had big social and emotive impact even without a public health scare.

Retailers rapidly saw dramatic changes in consumer behaviour. Tesco, for example, lost around 10% of its customer base during the height of the scandal. As the first retailer to be exposed as selling horse meat, Tesco was unlucky. *All* the major retailers,
save Sainsbury’s and Marks & Spencer were affected. Sainsbury’s supplies were clean, largely as a result of their comprehensive DNA testing systems being known to criminals; Marks & Spencer do not buy processed meat to eliminate risk of cross-contamination with pork.

Food crime
Large-scale food fraud operates across the food supply network. Some sophisticated operators have access to detailed, highly accurate intelligence around supply networks and testing.

The Professor coined the term ‘food crime’ to describe this non-trivial, highly lucrative, organised criminal activity.

Without personal knowledge of its provenance, any of the food products we eat could be subject to fraud. It affects high value products as well as cheaper ones; for example, the amount of champagne sold annually is triple its official supply. At the bottom end of the market, it’s possible that some fast food outlets exist for the purposes of money-laundering.

The UK is relatively sheltered from the worst breaches. As a means of comparison, the scandal over melamine in babies’ milk in China affected some 250,000 babies, with tens of thousands infants hospitalised. Eight deaths were officially reported, but the toll could have been much higher.

The public interest
It is important to ensure that the public interest is represented in the food industry. Yet, as with drug trafficking, successful police action doesn’t stem the flow of criminal activity, either making it more sophisticated or displacing it. Lessons can be learned from countering illegal narcotics, though we need bear in mind that purchasing illegal drugs is optional while buying food is not.

The consumer role
Consumers need to take some degree of responsibility and ask whether or not a food product is too cheap. If it is, there’s the potential that, at best, corners are being cut.

Reforms and initiatives since horsegate
Changes in purchasing & procurement procedures
All major multiple retailers have implemented changes in their purchasing procedures, but validating supply chains is a mammoth task given the 35,000 different food products they sell every week. There isn’t a straightforward way of detecting adulteration across so many product lines; what needs to be done has to be addressed at a national level.

The FSA Food Crime Unit
Seen as a controversial recommendation when the Professor published his draft review in December 2013, the setting up of a Food Crime Unit by Food Standards Agency is now seen as a priority. It currently has a number of major investigations underway.

UK food trade associations
The UK hosts a multitude of trade associations across food industry sub-sectors, each competing fiercely for members. Establishing a network of trade associations dedicated to sharing food crime intelligence might well be an excellent way of pooling
resources; the Food and Drink Federation is currently leading on this — no other country has got this far to date.

Interestingly, worries over competitive disadvantage hasn’t been a barrier to information sharing with retailers concerned that claiming to be clean would encourage scrutiny and, sooner or later, inevitably lead to the discovery of minor if not major food adulteration in their own supply chains.

**Tesco’s new policy of publishing food test results**
Tesco was the hardest-hit multiple retailer. It has publicly announced tighter supply chain quality controls, testing and, importantly, transparency. Their website currently contains details of their testing programmes and their results.³

**A new industry in food regulation?**
One of the recent stakeholder events the Professor attended was with KPMG’s business development arm. They anticipate a new industry in food regulation to develop over the coming years.

**Economic indicators**
Procurement managers have approached the Professor to express their frustration over endemic cheating among their competitors, forcing a race to the bottom on price. Processing companies are under the most price pressure, consistently buying at the cheapest price in highly competitive markets, a situation exacerbated by supermarket price wars. With profit margins on processed food around 2-3%, losing a contract to a supplier for any margin above this is often an indication of fraud; it was suggested this situation was one of the factors that alerted investigators over the horsemeat scandal.

Commodity price movements are also remarkably reliable indicators of food crime, supply behaviours that have frequently been observed in the olive and wheat markets. A failed crop should result in an increase in wholesale prices, but this will not occur if the shortfall in supply is replaced with a fraudulent or adulterated product. A bumper harvest often results in stockpiling, with the crop later sold as ‘fresh’ in subsequent poor harvest years.

Such behaviours can also be observed when there is a sudden demand for a product; for example, the sharp rise in demand for pomegranates for health drinks saw the market flooded within two years, despite the average time for a harvest being five or six years from planting.

Although economic indicators on the dynamics of supply and demand are very telling, there isn’t a national body responsible for systematically using them for food fraud intelligence purposes, although the FSA’s Food Crime Unit is starting to do so.

**Two examples of tackling food crime in other countries**
As part of his Review, Professor Elliott looked at best practice in other countries.

**Holland**
Holland, for example, established a food crime unit 20 years ago. They do not see food crime as petty; they take it very seriously and have significant powers, such as being able to tap phones. Intelligence comes from over 100K pieces of information a year, leading to 5-15 investigations a year based on the seriousness of the potential crime.

³ [http://www.tesco.com/food-concerns/results/]
Italy
It is widely acknowledged that parts of Italian food industry has been taken over by mafias as food crime is a perfect way to launder money. To counter this organised crime, the Italian government has set up a dedicated police force of over 200 officers.

A synopsis of Nick Lowe’s presentation

The role of the local authority
The local authority is at the front line in tackling food crime.

Nick Lowe welcomed the Elliott Review which he hopes will lead to food crime being taken more seriously.

He is pleased that the FSA has set up a food crime unit, but operational work falls to the local authorities with scant resources. In Birmingham, a city of over 1M people, there are just 15 FTE officers covering food standards, inspections, hygiene and food crime — with a further budget cut expected in April. What is needed is more resources at the operational level, hence he remains cautiously optimistic about the impact of the Food Crime Unit as it is currently positioned.

Resources to investigate food crime
It’s becoming increasing difficult for local authorities to investigate food crime. It’s a complex crime, very resource intensive and difficult to investigate. Moreover, EHO routine work is food hygiene; food crime is a very different requirement.

Birmingham strives to be at the forefront of investigating food crime, but it’s a target increasingly at risk owing to reducing resources.

The Illegal Meat Task Force of old is now the FSA Food Fraud Unit. In this current system, local authority officers investigating food fraud give up a proportion of their time to support other local authorities. Coordinating this collaboration is the only operational assistance that the FSA provides. The FSA itself is not expecting new resources; the most it can do is reshuffle existing employees.

It’s hard to be clear about the Food Crime Unit’s impact if it doesn’t reposition itself to become more operationally capable. Local authorities are looking to the FSA to take the lead on this matter.

A comparison with Holland
Nick Lowe also talked about the sophisticated food crime and intelligence unit that has been running in Holland for over 20 years. Their phone tapping and similarly sophisticated covert techniques reflect the seriousness of the crime involved; such practices could serve as exemplars for the FSA Food Crime Unit. There is a need to increase the flow of data in the UK, and to demonstrate successful prosecutions in order to secure ongoing political support.

Why is Birmingham a target for food crime?
Several vulnerabilities make Birmingham a prime target for criminals operating in the food supply network. High population density makes it easy to sell large volumes of illicit product. Concentrations of poverty, deprivation and intense price competition in some areas exacerbate the problem — businesses ask fewer questions when procuring food supplies.
The onset of the recession saw increases in food crime as corners began to be cut and reliable accreditation became less important. Auditing local businesses to identify these practices is, however, difficult in the absence of reliable records.

Gathering evidence is similarly difficult. Covert operations are often necessary to avoid alerting criminals that an investigation is under way.

This situation is more prevalent and more complicated with the existence of many niche markets serving our diverse ethnic communities. The halal market, being based on trust relationships, is the most common example. Unscrupulous operators can easily abuse this trust. Environmental Health periodically carry out food traceability assessments in specific areas.

In summary, tackling food crime in Birmingham is very resource intensive and difficult to investigate.

Examples of food crime and/or potential food crime in Birmingham

✦ Investigations into a burger manufacturer revealed both a victim and a perpetrator. The company had been buying blocks of frozen ‘beef’ from approved brokers based mostly in Belgium. This meat was put through a flaking machine on arrival. Despite appearing sound, a substantial amount of horsemeat was concealed inside the blocks. Once the meat had been further processed and minced, the adulteration was impossible to detect by looking at it. The manufacturer was oblivious of this substitution, but the factory was simultaneously discovered to be substituting beef with cheap mechanically recovered chicken. The factory owner was prosecuted and fined £90,000. He is still in business today.

✦ A halal butcher was unaware of where their chicken came from. They had no information at all about their supplier; the arrangement was for them to make a call, place an order and wait for it to arrive soon afterwards in the back of a nondescript van. The shop owner had no names, addresses or contact numbers for investigators’ use.

✦ Fish speciation has been a big issue since 2009 owing to depleted stocks. Many takeaways and restaurants make unsubstantiated claims about their fish. A traceability study on fish is planned for this year, but training of officers in species identification is needed.

✦ Some organisations collect diseased, contaminated or bruised meat not intended for human consumption. The waste carcasses are then repackaged and resold into the food supply chain and stated as fit for human consumption. The meat can then receive ‘health marks’ from other approved organisations to confirm its legitimacy and then be sent to an approved cutting plant complicit in the scheme.

✦ False accreditation as halal poses problems. The Halal Monitoring Committee accredits products and they command a price premium on the market. Several organisations have been prosecuted for fraudulent use of HMC stamps on non-accredited food.

✦ ‘Smokies’ are lamb or goat carcasses sold without the skin removed (a regulatory requirement), heightening the risk of faecal contamination.
✦ Other issues include illegal, untraceable meat imports, the resale of rejected meat and by-products intended as pet food, and the use of unapproved cutting plants.

✦ Adulteration in basmati rice presents a problem. Depending on crop yields, basmati is often substituted with cheaper varieties of rice. Detecting this is difficult for consumers.

✦ Unsubstantiated claims around health products, ‘traditional’ or ‘natural’ products, and organic products are subject to similar problems.

✦ Food fraud in allergens is known to occur. A potentially very dangerous example is the substitution of cheaper peanut paste for almond paste.

Food fraud incidents, being external to legitimate industry, tend to be accompanied by very poor hygiene and safety standards. Furthermore, any and all adulteration involving false accreditation invalidates vetting processes in the legitimate meat supply, since it is often produced away from acceptable health standards.

In false accreditation cases in the meat sector, the authorities cannot know where animals were reared, whether they were properly inspected and inoculated, or whether they were correctly slaughtered. Combined, these factors pose a big problem for Birmingham; meat unfit for human consumption is continuously being put in to the supply chain.

✦ One investigation into poor hygiene standards at an apparently defunct butcher’s shop required surveillance over 150 hours. It transpired that the shop in question had been taking deliveries of waste chicken carcasses from a Preston slaughterhouse, which were then left outside in filthy open crates before being repackaged for onward delivery in run-down, non-hygienic facilities. (Environmental Health were actually brought in to investigate neighbours’ complaints about the stink.) The investigation led to further revelations of unapproved sheep carcasses being given false stamps and concluded with successful prosecutions.

Tackling food crime

As can be seen from the examples above, fraudulent food can be hard to detect in the open market. Large scale schemes can be worth millions of pounds; heightened criminal sophistication in protecting these revenues is hampering local authority investigations.

Food crime is a very different activity from routine hygiene work, and almost always requires surveillance and intelligence gathering over time; it’s very labour-intensive.

It’s important to recognise too that ‘food criminals’ and often ‘normal criminals’ that happen to deal with food but also operate in several other illegitimate industries. Crossovers with serious organised crime are endemic.

Relationship with the police

The Environmental Health team works with West Midlands Police on a variety of matters, but not surveillance owing to its resource-intensive nature. Involvement of other police forces in Rotherham and Derbyshire had used significant police resources and, since then, the received wisdom among many police officers had been to steer
clear of food crime matters. This view is, however, starting to change and more police support is being offered.

The discussion

Examples of food crime and some of the drivers

During the evening, other examples of food crime were talked about. They’re listed below as illustration of the nature of the challenges we’re facing:

✦ Red meat products suffer from adulteration at the low-margin cheap end of the supply network as the huge volumes make such schemes economically very profitable.

✦ There’s another problem with canned meat; it’s hard, often impossible to detect different species as the canning process alters DNA.

✦ Moreover, when food crime is detected in one product, criminal activity is carried on but with a different product. For example, there is currently [December] a lot of goat in the system.

✦ Most fish and chip shops advertise cod, but there are restrictions on cod fishing so there cannot be the supply on offer.

✦ There’s probably more fraud in fish supplies than other commodities as it’s hard to tell the difference between species when filleted. A recent Which? survey showed 10–20% of fish was mislabelled.4

✦ Another fish fraud is the capture method. There are allegedly lots of line and pole caught fish, which have a price premium over trawler-caught fish. It’s hard to test for this, but one of the Professor’s researchers is looking for types of stress levels as there are different biochemical markers for exhaustion and for suffocation.

✦ Many products are fraudulently labelled as fairtrade, organic, green and/or from sustainable sources, reflecting the need for robust, highly transparent auditing and checking systems.5

✦ Existing regulation with ‘fairtrade’ is complex; the fairtrade label can be legally used providing the manufacturer sources a minimum of 30% of the product from fairtrade sources. The complexities and aggregated production lines of food processing prevent producers from separately one ingredient from another, so a 100% threshold can make fairtrade a practical impossibility.

✦ The more processed the food product is, the harder it is to detect fraud. For example, a typical pizza has some 40 ingredients sourced from up to 20 countries.

✦ It’s often clear when independent fast food vendors sell food too cheaply than is legitimately possible, particularly for meats and fish. There is, however, a danger of stigmatising hard-working people when addressing these issues. Consumers need to exercise judgement. Yet the prevalence of cheap, low quality meals undermines the incentive to do so, particularly for people living on low budgets.

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4 See Which? investigation uncovers fish fraud, September 2014.

5 An example of the relentlessness with which a purchasing manager need operate is illustrated in this short video interview with San Edom of the Handmade Burger Company, recorded during the Elliott Review Birmingham consultation.
Prioritisaton and risk

The severity of health implications must be considered when deciding what to focus on. The current standard is a 5x5 risk matrix ranking the potential health impact on the consumer (life-threatening, acute or chronic) against the probability of fraud occurring. Generally, the more processed foods are the higher they are ranked, having both higher health impact and containing more ingredients so presenting more opportunities for substitutions, adulterations and mis-labelling to take place.

Food fraud can potentially be extremely dangerous, often much more so than fake consumer goods. ‘Californian’ almonds from Turkey might not appear dangerous, until the almond paste produced from them is adulterated with peanuts posing potentially lethal effects on people with peanut allergy.

Fraud, though, need not be present for unexpected health risks to arise; global supplies of rice grown in areas with water run off from the Himalayas can have high levels of arsenic presenting a potentially very serious chronic health issue.

It’s important to consider both acute and chronic health impacts of food crime. Chronic health impacts are often difficult to track but they could be potentially carcinogenic (e.g. dyes in chilli powder) or unhealthy leading perhaps to coronary disease or diabetes. The ideal situation is that such instances should be tackled at the point of introduction into the food supply network (i.e. prevention) rather than after when remedial action is limited if not impossible.

Self-regulation by industry?

A lack of independence in industry-wide investigations does not sit well with public accountability. Local officials, representing the public, cannot rely on what industry chooses to reveal.

An example of this occurred with the salmonella outbreak at Cadbury in 2006. The danger of salmonella poisoning in chocolate is acute as the bacteria encases itself in fat layers which means dangerously high quantities can be in the product.

Cadbury had moved from operating zero-tolerance procedures to procedures reflecting probabilistic estimates of salmonella presence in their daily chocolate production of 300 tonnes. Their own testing, which they had subcontracted to a private company, had shown salmonella in their product. Yet they refused to give Birmingham Environmental Health the results of these tests which only came to light as the private testing company had itself outsourced their Cadbury work to a public laboratory who routinely published the results of all their tests.6

Testing laboratories: Private or public?

Public laboratories have to adhere to strict (and expensive) quality control methods for their results to be admissible in Court cases, but the funding available to carry out sampling continues to decline. As in many other local authorities, Birmingham City Laboratories been subject to a lack of investment,7 and no longer employs a Public

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6 See also Unanswered questions in Cadbury salmonella case in Food Manufacture, September 2008.

7 In her unpublished MSc dissertation with the Food Safety Group at the University of Birmingham, Sally O’Neill gives figures for five LA budgets for food testing Birmingham’s was halved to £30k in 2013-14, as was Tower Hamlets. Although worrying, these cuts are not as drastic as that in Coventry where there has been a 79.8% reduction in budget between 2008 and 2013-14, from £19.9K to only £4075 last year; Kate Cooper mentioned this figure to Martin Reeves, Coventry CE and former SOLACE President (when talking to him on separate matters). Her understanding from him is that food safety and food crime are ‘not even on the radar’ of LA Chief Executives, nor likely to be. The concern is therefore that, should there be a food safety or food crime emergency with the need for an urgent and immediate public health response, local authorities might well be in a state of surprised paralysis.
Analyst. (As all local authorities are obliged to appoint a Public Analyst, Birmingham City Council turns to either Staffordshire or Worcestershire.)

The role of Public Analyst was set up 100 years ago to prevent food fraud, and is now on the brink of collapse, leaving the public vulnerable. Now, as then, there is a vital need to ensure that the public interest is represented, rather than many private interests. Yet there are currently only six laboratories in England with a Public Analyst, none in Northern Ireland. Public Health England are currently looking at the role of the Public Analyst nationally.

It was felt that small and medium-sized laboratories were desirable, being close to the ground. They are, however, unlikely to have a place anymore. There is still a pressing need for laboratories to carry out regional work, yet no individual local authority could afford to purchase and maintain the specialist equipment that’s required.

The Professor and others are therefore pressing to have a national network of fewer, larger laboratories in the public realm, concentrating on different specialisms and with the funding to invest in the relevant equipment and highly trained and professionally experienced staff. Some felt, however, that the current situation, with local capacity so eroded, might mean that even such a network system would not work.

The safety and integrity of our food supply could well be at risk, and continue to be so without substantive change.

Political decision-making and the Elliott Review

Cross-governmental activity
A week after our meeting, a cross-governmental meeting on food was due to take place, chaired by George Eustace MP, Parliamentary Under Secretary of State at Defra. Also present will be representatives from the Department of Health and the Home Office.

The Professor said that significant cross-departmental civil service research activity has begun around food futures for the UK, and this is the first time for several years that food has been seriously discussed at high level talks.

Cross-party activity
It’s hard to say whether or not the General Election will change the impetus or not. The Professor had been told by some that carrying out the Review was at the wrong stage in the government cycle with it being published in the final year of this Government. He has, however, spent time talking to the Opposition and they appear to have a strong commitment to tackling food crime.

Since the December meeting …

John Middleton and Jim Parle: Article in the BMJ

After taking part in the December meeting, two of our Board members, Dr John Middleton and Professor Jim Parle published a ‘grey’ paper on the British Medical
Journal website: Food crime — why should doctors care? which outlined the major threats to public health, extracts below:

✦ horsegate and public health
   ‘It was a lucky accident if horsegate did not damage public health; in practice our surveillance systems and knowledge of the provenance of the meat are inadequate to tell us whether or not it did.’

✦ the unscrupulousness of criminals
   ‘Should we really expect large scale criminal operations, capable of adulterating tonnes of meat, to be operating with exemplary food hygiene standards? Would we assume they knew where all the meat came from? or that they would be fussy about throwing in tainted or diseased meat?’

✦ doctors need to be suspicious . . . and vigilant
   ‘Doctors need have a high index of suspicion regarding food allergy and be vigilant in suspecting food poisoning.’

✦ the decline of the public analyst role
   [The] ‘drive to tackle food crime comes at a time when the public analyst role has become endangered in the UK, and local authority testing capacity has reduced considerably.’

✦ food crime disproportionately affects the people living on low budgets
   ‘Current austerity policies in most western countries are creating new and bigger markets for criminally processed food. There is growing recognition of the problem of food poverty and acute hunger in the UK, and people who are poor are the most vulnerable to being exploited by food criminals.’

International Food Fraud Network (IFFN)
Kate Cooper, in her role as Chair of the Birmingham Food Council, took part in an invitation-only meeting in mid-December with the IFFN in Manchester. The IFFN is part of the University of Manchester Food Fraud and Adulteration Project, a multi-disciplinary project led by Manchester’s Centre for Criminology and Criminal Justice.

The meeting was attended by academics from several disciplines and people from the food industry, including a senior official from the FSA. It was the first step in planning a conference on food crime to be held in May 2015. The discussions took place under Chatham House rules.

Professor Lisa Jack
Kate has also met with Professor Lisa Jack of the Food Fraud Group at Portsmouth Business School, and occasional lecturer at Aston Business School. Her expertise is in forensic accountancy.

Discussions were around (a) her research group’s findings that food companies that had active anti-fraud financial systems in place were more profitable than those who hadn’t and (b) a possible large-scale research project looking at food supplies into the West Midlands conurbation.

See Minimising fraud and maximising value in the UK food and drink sector 2014.
Further information

✦ Information about Birmingham Environmental Health Food Safety and Hygiene is [here](#). The latest list of traders prosecuted for food offences (March 2014-September 2014) is [here](#).

✦ Professor Chris Elliott and Professor Pat Troop reported to the Commons Select Committee on Food Supply Networks on 14 November 2014. A transcript of their oral evidence can be downloaded [here](#).

✦ EU Regulation 1169/2011 Provision of Food Information for Consumers came into force on 13 December 2014. Its overall purpose is to clarify and standardise labelling regulations across the EU. The Food Standards Agency Summary Guidance is [here](#); note clauses 42-48 regarding business-to-business communication which, for the first time, falls within the scope of the law with a requirement for a business to provide its direct customer the information they need to fulfil their legal requirements under food standards legislation.

✦ Interpol and Europol operate a food and drink crime unit. This is known as Opson. Their latest report is Opson IV (2014) which you can find [here](#).

✦ Which? have long campaigned against food fraud and publish results of their tests. As well as the fish fraud investigation mentioned above, their work also includes Food fraud: What’s in your takeaway? last April when their DNA tests on 30 meat samples from London and 30 from Birmingham revealed 8/30 in London and 16/30 samples in Birmingham were adulterated.

The above is in addition to the following:


✦ The Elliott Review Birmingham.