

Geoff Ogle
Chief Executive
Food Standards Scotland
4th Floor
Pilgrim House
Aberdeen
AB11 5RL

Alyn Smith MSP
Convener
Criminal Justice Committee
Scottish Parliament
Edinburgh
EH99 1SP

cc: criminaljustice.committee@parliament.scot

Date: 30/06/26

Dear Alyn

Food Standards Scotland (FSS) was established in April 2015 as the new public sector food body for Scotland, to protect the health and wellbeing of consumers in relation to issues around food and feed law, and food standards. Our key priorities are public health and consumer protection in relation to food, taking action to address preventable foodborne illnesses, helping to tackle food crime and providing advice which promotes a healthy diet. FSS is part of the Scottish Administration but is independent of the Scottish Ministers and of industry, and is accountable to the Scottish Parliament.

On 25 September 2024, during an evidence session on food crime attended by Ron McNaughton, Head of FSS's Scottish Food Crime and Incidents Unit (SFCIU), and Ian McWatt, Deputy Chief Executive of Food Standards Scotland (FSS), the Scottish Parliament's Criminal Justice Committee agreed that it would welcome an annual report from the SFCIU on food crime, and on its work in tackling food crime (Scottish Parliament, Criminal Justice Committee, Official Report, 25 September 2024, Col. 23).

Please find attached the SFCIU's Annual Report on Food Crime, which covers the period from 1 April 2025 to 31 March 2026. I would be grateful if you could please arrange for the Annual Report to be shared with members of the Criminal Justice Committee.

FSS's SFCIU would be willing to attend an evidence session on a date convenient for the Criminal Justice Committee to discuss the Annual Report, and its work in tackling and preventing food crime.

In the meantime, please do not hesitate to contact Ron McNaughton, Head of the SFCIU, by phone ([REDACTED]) or by e-mail ([REDACTED]) if you require more information, or to discuss this matter further.

Kind regards



Geoff Ogle
CEO, Food Standards Scotland

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The report outlines the following:

- An introduction into the SFCIU's response to food crime
- Current food crime threat landscape
- SFCIU Food Crime Control Strategy priorities 2025-26
- Horizon Scanning activity
- Intelligence development action
- Investigations undertaken
- Food crime prevention
- Multi-agency and partnership work
- Future activities

The SFCIU brings together the investigative and intelligence functions of FSS, and was established to prevent, detect and investigate fraud and deliberate non-compliance across the food and animal feed chain, while supporting public bodies during incidents to protect public health from risks associated with food consumption.

Food crime is described as serious fraud and related criminality in food supply chains and has an estimated cost to the UK of around £1.96 billion per year¹. Crime targeting the food chain causes serious harm to consumers, damages confidence in food supply and adversely affects business and UK food security. It is a financially motivated crime that can have serious health consequences for consumers where, because of deceptive and illegal practises, products have

¹ [The Cost of Food Crime Phase 2](#), Food Standards Agency, March 2023

been adulterated, substituted, or their authenticity has been misrepresented. The risks to those with allergies are incalculable.

Although most food and drink on sale in the UK is safe and authentic, there are inevitably economic pressures, changing consumer demands, environmental impacts and geopolitical events which present new opportunities for criminals to exploit.

The response to serious food crime in Scotland is underpinned by a fully coordinated, intelligence-led approach headed by the SFCIU in close collaboration with domestic, UK and global partners, including law enforcement, regulators, industry stakeholders, as well as concerns raised by the public. Safeguarding the integrity of the supply chain is paramount to ensuring that food placed on the market is both safe and authentic, protecting consumer and legitimate business interests.

Threat Landscape

Food crime in Scotland is economically driven, systemic in nature, and increasingly influenced by global supply chain disruption.

Financial pressure is a significant factor across sectors, linked to rising energy, transport, input costs, and influenced in part by broader geopolitical instability. These conditions are contributing to an operating environment in which fraudulent practices, such as adulteration, substitution, and misrepresentation become more financially attractive, particularly in low-margin sectors.

Food crime may often be embedded within otherwise legitimate supply chains, rather than occurring through overtly illicit channels. Complex factors, such as multi-stage supply chains, potential weaknesses in traceability and resource challenges to regulatory oversight render the food industry vulnerable to exploitation by opportunists and organised crime groups.

Intelligence gaps remain, particularly regarding the scale, frequency, and network structures underpinning food crime, indicating that current reporting underestimates the true level of food crime. This is driven in part by capacity issues. Without targeted intervention, these conditions are likely to result in a gradual escalation of fraud, particularly within high-risk commodities and pressured sectors of the food industry. In response, SFCIU continues to focus on:

- Enhancing intelligence development, predictive capability, and supply chain visibility
- Strengthening partnerships and data sharing
- Improving early detection and prevention in a high-pressure economic environment

SFCIU Food Crime Control Strategy 2025/26

Following an in-depth risk analysis and intelligence-led process, the SFCIU [Food Crime Control Strategy](#) identified the following as key threats affecting Scotland and the focus for tackling, mitigating, and preventing crime in the food, drink, and feed supply chains:

- **Meat and Meat Products** - criminality in the meat and meat products supply chain impacting on authenticity and traceability
- **Animal By-Products** - entry of illegal product into the food and animal feed chains
- **Alcohol** - illicit and counterfeit alcohol in the supply chain

- **Supply Chains of High Risk** - fraudulent activity within supply chains assessed to be of substantial risk to Scotland

The Unit operates in line with the National Intelligence Model (NIM), which is a business process employed by UK law enforcement to ensure the consistent gathering, evaluation and management of information and intelligence and the prioritisation of resources based on assessed threats. In practice, this is driven through FSS-led tactical tasking and coordination group (TTCG) meetings.

Horizon Scanning – Forecasting the Future

SFCIU is an active partner in government, law enforcement, and industry multi-agency groups, who all share information and intelligence to drive horizon scanning profiling. This activity is undertaken jointly with the Food Standards Agency's (FSA's) National Food Crime Unit (NFCU), which has responsibility for England, Wales, and Northern Ireland.

The Middle East conflict is acting as a systemic stressor on the agri-food system, primarily via energy and logistics disruption. It does not directly trigger food crime but significantly increases the underlying drivers: financial strain; supply chain complexity and reduced capacity for oversight. There is potential for a progressive escalation in relation to:

- High-value and complex commodities (e.g. meat, alcohol, processed foods)
- Import-dependent supply chains
- Points of weak traceability or regulatory oversight, including ports and fragmented distribution networks

Intelligence

The SFCIU has an experienced intelligence team which manages all information received in accordance with the NIM and complies with statutory requirements and oversight enabling intelligence sharing with all major law enforcement and regulatory agencies operating in Scotland, and others across the UK and internationally. Investigations undertaken by SFCIU are intelligence-led and rely on input from many sources, including:

- In partnership with Crimestoppers, FSS provides the free and confidential Scottish Food Crime Hotline (0800 028 7926) at [Food crime | Crimestoppers](#) and provides an online webform at [Scottish Food Crime Hotline | Crimestoppers](#). This provides opportunity for members of the public, whistleblowers, industry, etc, to provide information in strict confidence
- The SFCIU introduced a streamlined reporting mechanism via a digital webform with QR code access, which allows partners to submit intelligence directly into the Unit's case management system. Such direct access significantly improves the volume, quality, and timely reporting of actionable intelligence, enabling better enforcement outcomes
- The SFCIU continue to act as the central intelligence-hub for local authority Food Teams and for the Animal and Plant Health Agency (APHA) in Scotland
- The SFCIU continue to provide intelligence support to the Scottish Government and APHA led multi-agency response to the risk of disease from illegally imported meat
- The SFCIU has a long-standing Memorandum of Understanding (MOU) with all thirty-two local authority Food Teams, incorporating a 'Scottish Food Crime Model' which formalises

partnership working, intelligence sharing and an agreed to the investigation of serious food crime and food fraud

Investigations

During this reporting period, the SFCIU conducted a number of intelligence-led investigations falling within the scope of the Food Crime Control Strategy, including alleged waste diversion and counterfeit goods.

As a Specialist Reporting Agency, the SFCIU reports directly to the Crown Office and Procurator Fiscal Service (COPFS). For example:

Case Study – Illicit sale of Animal By-Product (ABP)

During 2025, the SFCIU conducted a protracted investigation into an animal carcass processing business and the illicit sale of ABP as dog food. The supply of ABP for this purpose is strictly regulated and only to approved end users, e.g. zoos and registered kennels, to minimise the risk to human health from the transfer of disease, parasites and pathogens through improper handling and storage. This practice had first been discovered by regulators during routine inspection of the business, who noted numerous bags containing fresh meat being offered for sale to the public, including those with prime cuts which raised concern some of the ABP may be intended for the food chain.

Further intelligence was received which led SFCIU investigators to approach a lorry associated with the business within a public car park. The lorry was found to contain bags of ABP ready for delivery to a number of potential customers waiting nearby. This was confirmed to have been ordered by non-approved pet owners and was likewise unsafe for public handling and storage without special provisions being met. The ABP was seized and marked for appropriate disposal.

Following this, SFCIU investigators, assisted by officers from the local authority, searched the business under a court warrant and seized records. Evidence gathered confirmed the sale of ABP to non-approved end users had been ongoing over a period of years. Numerous bags of ABP found on premises during the search were subject to immediate restrictions, ensuring they were disposed of appropriately.

It was revealed that ABP was being sold to ordinary members of the public, who had not been advised of the strict conditions for handling and storage out with a domestic setting. Instead, it was unwittingly being kept in fridges and freezers alongside food and prepared for feeding to pets using the same utensils and space in kitchens for preparing family meals, exposing those living there to significant risk to health.

Such is the severity of risk associated with the handling and storage of this type of ABP, the business operators have been reported to COPFS for culpable & reckless conduct, along with various regulatory offences.

While no confirmed evidence of ABP entering the food chain was identified, the investigation exposed a systemic and sustained breach of biosecurity controls, with clear implications for public health and regulatory effectiveness. Intervention by the SFCIU, supported by partner agencies,

effectively disrupted the illicit supply of ABP, preventing potential harm to customers and their families.

ABP remains a priority for SFCIU in their Control Strategy and findings from this case are included in a Problem Profile prepared by the Unit to outline the threats and risks, and recommend prevention, intelligence development, and enforcement actions for FSS and partner agencies to consider in the regulation and inspection of businesses processing ABP.

Counterfeit Alcohol – Continuation of Investigation

In 2024, the SFCIU worked in close collaboration with local authorities (LAs) and other partner agencies in seizing 231 bottles of counterfeit vodka containing potentially lethal isopropyl alcohol from independent retail outlets across the Central Belt of Scotland. A Food Alert for Action (FAFA) had been issued by FSS to all Scottish local authorities on that occasion, which resulted in further premises being identified as stocking this dangerous product for sale to consumers.

In July 2025, a further twenty-five bottles of similar counterfeit vodka containing isopropyl alcohol were recovered from an independent retail outlet in North Lanarkshire. This prompted FSS to issue another FAFA, which Scottish LAs responded to by visiting 1700 premises around the country. No further recoveries were made, providing reassurance that this was an isolated event.

As with the response in 2024, the SFCIU convened a multi-disciplinary meeting involving Public Health Scotland, NHS, National Poisons Information Service, Police Scotland, LAs and the Scottish Ambulance Service, who reaffirmed relevant actions within their agencies and agreed on public messaging to mitigate the potential risk to public health.

The SFCIU and LAs have jointly reported a number of food business owners to COPFS for consideration of prosecution in relation to culpable and reckless conduct, and food safety and liquor licensing statutory offences. The SFCIU also provided evidence for consideration at Licensing Board hearings, leading to the revocation of premises and personal alcohol licences for those held as responsible.

In late 2025, SFCIU conducted test-purchasing of vodka from potentially high-risk supply chains across the Central Belt of Scotland and found no further evidence of counterfeit product in circulation, indicating that enforcement action and associated targeted messaging had had a measurable deterrent effect.

Update on Tea Fraud

It was previously reported to the Criminal Justice Committee that, on 25th June 2025, Thomas Robinson of Amulree, Perthshire, who had been found guilty on two counts of fraud following trial, was sentenced at Stirling Sheriff Court to three and a half years in prison.

This was the culmination of a long-running SFCIU investigation which proved that, between 2014 and 2019, Robinson had fraudulently reidentified and sold imported tea as “Scottish-grown” to high-end hotels and retail establishments in Edinburgh, London and Paris and supplied over 22,000 misrepresented plants to unsuspecting growers in Scotland and Jersey. He fabricated academic qualifications, tea-expert credentials and international tea awards, and fronted non-commercially viable tea plantations in support of the fraud.

Evidence showed that Robinson sourced tea and plants cheaply from England and the EU, then reidentified and sold them on at hugely inflated prices on the pretence they were premium Scottish grown products. In total, he defrauded consumers, businesses, and growers of over £550,000.

Proceeds of Crime Act (POCA) proceedings in this case remain pending.

Ongoing Cases

The SFCIU have four cases under consideration at petition level by COPFS, with a further three cases at potential petition level under investigation. These cases relate to the Unit Control Strategy priorities under meat and meat products, ABP and alcohol.

Food Crime Prevention

The FSS Food Crime Prevention Strategic Plan 2024-27 sets out a model for the identification, analysis, and implementation of preventative measures in relation to food crime. The plan is due to be completed by 31st March 2027.

Prevention is a key objective of the SFCIU, which has introduced a number of measures to improve food industry awareness on food chain vulnerabilities and mitigation of risk, including:

- A Food Crime Prevention webinar delivered to over two hundred attendees from industry and regulatory bodies, offering practical prevention and mitigation measures
- Continuing rollout of the FSS Food Crime Risk Profiling Tool, designed to help food business operators reduce their vulnerability to food crime. Collaboration with the FSA is ongoing with a view to create a single profiling tool for the UK
- Outline planning for future joint agency workshops aimed at small and medium-sized businesses to explore food crime and food incident vulnerabilities across the food chain and how these can be addressed

Multi-Agency and Partnership Working

The SFCIU continued to establish strong and enduring relationships across domestic and UK law enforcement, regulatory bodies, government agencies, local authorities, and industry stakeholders to:

- Develop an enhanced intelligence picture
- Understand risk and vulnerabilities in the food, drink, and animal feed supply chains
- Undertake joint enforcement, disruptive or preventative activity
- Undertake horizon scanning activity and identify emerging risks
- Ensure our food is safe and authentic
- Ensure responsible food businesses are enabled to thrive

The following are some recent examples of SFCIU partnership engagement:

Law Enforcement and Regulators

- The SFCIU contributes to the Scottish Multi-Agency Strategic Threat Assessment and participates in the bi-monthly sitting of the Multi-Agency Tasking and Delivery Board (MATDB), chaired by Police Scotland. The MATDB brings together law enforcement and partner agencies to combine resources in tackling identified threats affecting Scotland by organised crime groups. The SFCIU has received investigative support and access to forensic services through this forum, as well as contributing to national concerns such as Operation MACHINIZE 2, a UK initiative led by the National Crime Agency targeting organised crime operating from high street businesses, including food businesses.
- The SFCIU participated in national discussions, chaired by DEFRA, looking into illegal imports and anti-avoidance measures in relation to 'qualifying Northern Ireland goods' (QNIGs) entering the British mainland via west coast ports across the UK. This led to the formation of an Illicit Imports Working Group led by the Scottish Government Department for International Trade, focusing on illicit imports through Scottish ports. The SFCIU provide secretariat and intelligence support for this Working Group, whose members include: Police Scotland Border Policing Command; FSS; local authority (Trading Standards and Environmental Health); APHA; Border Force Northern Ireland and Border Security Command/Home Office Intelligence (Causeway Hub); HMRC; DAERA; Food Standards Agency (NI); as well as other Scottish Government departments. The SFCIU has developed a Problem Profile, which has identified: the threats and risks; rationalised the capabilities, capacity, and powers available to each agency; intelligence gaps; and opportunities for multi-agency disruption of illicit goods movements through the ports.
- The SFCIU routinely engage with all Scottish LAs in providing mutual support to build the intelligence picture and address potential threats of food crime.
- The SFCIU regularly collaborate with NFCU counterparts, sharing intelligence and working together on operational matters affecting both sides of the border, for example illicit supply of 'smokies' (unlawful slaughter and production of skin on carcass sheep). This collaboration increasingly intersects with serious and organised crime, often characterised by sophisticated and transnational supply chain networks.

International Partners

- Until recently, the SFCIU chaired the Global Alliance on Food Crime made up of membership from Australia, Canada, USA, UK, and New Zealand, collaborating on operational and strategic initiatives, and intelligence sharing with the aim of reducing the international threat from food crime.
- The SFCIU and NFCU combine as the UK representative on Operation Opson (Europol/INTERPOL joint operation targeting fake and substandard food and beverages) and EMPACT (European Multidisciplinary Platform Against Criminal Threats) to help protect international markets. The SFCIU were the co-leads for OPSON and EMPACT with the Netherland Food and Consumer Product Safety Authority (NVWA).
- The SFCIU and NFCU strengthened global horizon scanning through the Strategic Food Safety Dialogue, expanding partnerships with Italy's ICQRF, the NVWA and the European Food Fraud Community of Practice. Agreements support joint operational activity to address emerging threats and enable knowledge transfer on intelligence gathering, digital techniques and prevention.

Industry

- The SFCIU has a long-established relationship with Food Industry Intelligence Network (FIIN), an industry group comprising of the largest UK food retailers, manufacturers, and food service operators. This continues to be important for sharing data on emerging risks and food fraud trends, informing risk analysis, and supporting efforts to protect the integrity of UK food supply chains.
- The SFCIU continue to maintain regular contact, including through established work groups, with various industry representative bodies, including Quality Meat Scotland (QMS), Safe and Local Suppliers Approval (SALSA), Red Tractor, Scottish Grocer's Federation, Scottish Food and Drink Federation, and the Scotch Whisky Association.
- The SFCIU provided presentations on food crime to the Scottish Parliament's Cross-Party Groups on Food and Independent Convenience Stores in session 6 of the Scottish Parliament.

Future Activities

Future activities will continue to be intelligence-led and processed through the SFCIU Intelligence Bureau. Horizon scanning data is assessed by SFCIU analysts with a view to meet future challenges and demands by anticipating emerging issues for consideration through the TTCG process.

Work will focus on delivering on the Control Strategy 2026/27 priorities through intelligence development, risk analysis, and utilising disruption and prevention opportunities. This will include the use of Crimestoppers to market food crime themes to promote the submission of intelligence in support of planned operations.

Multi-agency approaches to addressing food crime risk areas will continue to be key, particularly in terms of optimising available resources, intelligence, and operational capabilities. This activity covers multiple stages of the food chain, with risks emerging at various points and necessitating proportionate, partnership-led responses to address them effectively.

International collaboration remains an essential element of the response to food crime, including continued participation in coordinated global enforcement initiatives such as Operation Opson and EMPACT, contributions to Global Alliance activities, and ongoing engagement with EU partners to monitor and respond to emerging fraud trends.

SPS (Sanitary and Phytosanitary) Agreement

The SFCIU is supporting the implementation of the SPS agreement between the UK and the EU by looking to establish and maintain effective operational access and engagement arrangements for FSS/SFCIU across key food safety, incident management and intelligence sharing platforms, to ensure timely information exchange, coordinated response capability and strengthened protection of the Scottish food supply chain.

From a food crime and incidents perspective, SPS border controls are not just a regulatory or trade issue, they shape the threat landscape, vulnerabilities, detection capability, and enforcement model at the border and across supply chains.

The SFCIU has maintained close working relationships with EU law enforcement and regulators, principally through Operations Opson and EMPACT, which will ensure a smooth transition operationally when the agreement takes effect around mid-2027. Ongoing involvement in national forums, such as the Illicit Imports Working Group previously mentioned, provide a ready means for SFCIU and partners to collaborate and help respond to any challenges that arise following implementation of the SPS agreement.

SAFER (Scottish Authorities Food Enforcement Rebuild)

SAFER is FSS's strategic programme to reform and modernise the food law delivery model in Scotland to ensure food is safe and authentic and will involve a long-running transformation programme over a number of years. It is projected that the SFCIU will help inform on any developments necessary in the Scottish Food Crime Model, which is a core element of the Food Crime MOU with all Scottish local authorities, and make recommendations on how the fight against food crime can be more effectively delivered in the future model.