

Cross-Party Group on Food

26 February 2025 at 6pm, Committee Room 5 and Teams

Minute

Present

MSPs

- Rhoda Grant MSP (Chair)
- Annie Wells MSP
- Elena Whitham (virtually)

Guest speakers

- Professor Chris Elliott OBE, Queen's University Belfast
- Ron McNaughton, Food Standards Scotland
- Helen Gillen, the Food and Drink Federation

Non-MSP Group Members

In person

- Kirsty Tinsdale, Food and Drink Federation Scotland/CPG Food Secretary
- Sally Measom, Company Shop Group
- Jules Griffin, The Rowett Institute, University of Aberdeen
- Ann Packard, RSA Fellows
- Alistair B Williams, National Manufacturing Institute Scotland (NMIS)
- Tilly Robinson-Miles, University of Edinburgh
- Kirsty Jenkins, OneKind
- Renata Garbellini Duft, The Rowett Institute - University of Aberdeen
- Michelle McWilliams, the Rowett Institute, University of Aberdeen
- Robert McGeachy, Food Standards Scotland
- Joe Churcher, the Rowett Institute, University of Aberdeen

Virtually

- Fiona McCauley, Salmon Scotland
- Ifeyinwa Kanu, IntelliDigest
- Bill Crosson
- Bosse Dahlgren and Wendy Barrie, Scottish Food Guide

- Dinka Rees, University of Aberdeen
- Jana Anderson, University of Glasgow
- Jane Bunting, the Royal Environmental Health Institute of Scotland
- Jen Grant, Food Train
- Lesley Stanley, Consultant in Investigative Toxicology
- Liz Barron-Majerik, Lantra
- Lorna Dawson, James Hutton Institute
- Ruth Watson, Watson Consultants Ltd
- Simon Macdonald, Consultant
- Viv Collie, Vivid Ideas & Solutions
- Pat Scrutton, Intergenerational National Network
- Lucy Crapper, Company Shop

1. Welcome and Apologies for Absence

Rhoda Grant MSP (RG) welcomed all to the meeting and noted that the meeting was being recorded to help with the minutes.

Apologies were received from:

- Archie Gibson, Agrico UK Ltd
- Jackie McCabe, the Royal Environmental Health Institute of Scotland
- Martin Irons, Hospitality Industry Trust
- Mary Lawton
- Phil Thomas, Artilus
- Sandra Williamson, the Royal Environmental Health Institute of Scotland
- Ylva Haglund, Scottish Wholesale Association
- David Thomson, Food and Drink Federation Scotland
- Martin Meteyard

2. Minutes of the Last Meeting (11 September 2024)

The minutes of the last meeting were proposed by Simon Macdonald (SM) and seconded by RG and therefore approved and noted as a fair reflection of proceedings.

RG reminded members of the group that minutes from these meetings are publicly available and so if you feel anything needs corrected please get in touch with [Kirsty Tinsdale](#).

3. Matters Arising

RG thanked everyone that had put forward ideas for themes for meetings. This led to the Food Crime focus of this meeting and an update on Good Food Nation at the next meeting. Members of the group were encouraged to continue to suggest ideas for future meetings.

4. How can we help to prevent food crime in the supply chain?

There were presentations from:

Professor Chris Elliott OBE (CE), Honorary Professor of Food Safety at Queen's University Belfast

CE highlighted the following points:

- CE invented the phrase of food crime when he was explaining the seriousness of criminal activity in the food chain to Owen Paterson in 2013, who was the UK Government Secretary of State for Department for Environment, Food and Rural Affairs at the time.
- There is the involvement of organised crime in food fraud globally due to the high financial rewards and low risk of penalties. The money involved in food crime, surpasses the heroin trade and there is less risk in getting caught. PWC estimated 10 years ago that the estimated the amount of money being made from food crime globally was about \$50 billion per year and it's hugely more than that now.
- Food crime is often perpetrated by food businesses themselves, in particular SMEs, often driven by financial pressures within a business which can start with them taking a short cut. It can be rationalised as not having a serious impact on anyone.
- But food crime can cause people to get ill and even kill them – an example of lead poisoning in apple sauce in the USA was mentioned, where the lead came from the cinnamon added to the sauce. There were many cases of children being hospitalised. The cinnamon was grown and produced in Sri Lanka but the fraud happened in Ecuador, where the cinnamon was processed.
- Social media is becoming a key way that people can sell stolen food and counterfeit food goods and they'll use this social media network to distribute these products.
- We eat food every day and don't always know where it's come from due to complex supply chains which makes us very vulnerable.
- Most foods, commodities and ingredients can be associated with food crime from saffron to salt.
- It is important to protect consumers and businesses from food crime. Businesses could go bankrupt because of loss of reputation.

Helen Gillen (HG) - Regulatory Manager at the Food and Drink Federation (FDF)

HG highlighted the following:

- FDF represents the food and drink manufacturing industry which is the largest manufacturing industry in the UK. FDF has more than 1,000 members – from recognisable global brands to innovative start-ups.
- Food crime can affect any business regardless of size or sector. It has a financial cost and there are potential food safety risks. This means it's everyone's responsibility within a business to prevent food crime.
- The FDF provides members with a range of tools to support the industry in preventing food crime.
- [The FDF's Food Authenticity Guide](#) is publicly available and sets out the five-step process to help companies of all sizes protect their business from food fraud by identifying, prioritising and managing food authenticity risks. This includes mapping supply chains, identifying risks, assessing and prioritising risks, creating and implementing action plans, and integrating these plans into business operations.
- The FDF's Incident Prevention and Management Toolkit, Food Safety and Authenticity Report, food safety networking events and food fraud workshops, regular regulation newsletters and collaboration with UK regulators including Food Standards Scotland help support FDF members.

Ron McNaughton (RM) - Head of the Scottish Food Crime and Incidents Unit at Food Standards Scotland (FSS)

- As a former police officer RM noted that although he found the investigation into the distribution and supply of controlled drugs, particularly heroin and cocaine, to be extremely difficult, he felt that investigating food crime was a greater challenge due to the fact that the Scottish Food Crime and Incidents Unit do not have access to the same resources as law enforcement.
- The unit is made up of those that previously worked in law enforcement, which means they have the right people with the right experience with the skills to look for food crime and food criminals.
- For those with food allergies – food crime can be fatal and it is vital that what is on the food label can be trusted.
- Food crime is undermining legitimate businesses and restricts access to external markets, having an impact on Brand Scotland.
- Research carried out by the University of Portsmouth and published by the Food Standards Agency in 2023 suggested that the cost of food crime to the UK ranged from £410 million to £1.96 billion. This is the cost to consumers, businesses and government. This disparity is due to officially reported crime statistics and unreported activity.
- The UK has a great reputation for producing high quality food but it is difficult to control global supply chains.

- The unit works very closely with local authorities, the Food Standards Agency, the police, other law enforcement agencies and the Food Industry Intelligence Network.
- The unit has been successful in using Scottish common law in prosecutions which gives more flexibility and gives access to the use of search warrants and the ability for greater penalties to deter people for taking part in food crime.
- A milestone case for the unit last year was its first conviction – the conviction was of an individual that was supplying DNP to vulnerable people looking to lose weight. This chemical is not safe for human consumption under any circumstances, it has led to 33 deaths in the UK since 2017.
- One of the other key investigations for the unit involved the sale of counterfeit vodka which contained isopropyl, which is not intended for human consumption and is very dangerous. This was widely reported in the media. Around 230 bottles of counterfeit vodka was recovered and removed from sale. This was a good example of the unit working closely with local authorities to get the products off the shelves quickly.
- It is important to focus on prevention. FSS's [Food Crime Risk Profiling Tool](#) is a helpful way for businesses to reduce their vulnerability. Businesses take part in a self-assessment and are provided with a report within 20 minutes which will outline where they are vulnerable to food crime.
- Please report any suspected food crime by calling the Scottish Food Crime Hotline (0800 028 7926), in partnership with Crimestoppers. The hotline is free and anonymous and runs 365 days a year, 24 hours a day. More can be found on [the FSS website](#).
- The Scottish Food Crime and Incidents Unit is a co-leader for Operation OPSON which is a Europol joint operation targeting fake and substandard food and beverages which runs annually.

This was followed by an open debate where the following key points were noted:

- Elena Whitham MSP raised concerns about the potential link between food crime and human trafficking, emphasising the need for awareness and collaboration among law enforcement agencies.
- RM noted the importance of information sharing with police across the country, other regulators and other partners on organised crime as it can all be interlinked. Issues like human trafficking, smuggling and child labour are serious and could be linked to food fraud.
- Bill Crosson and Tilly Robinson-Miles raised concerns about the decline in environmental health officers (EHOs) and the impact on food safety enforcement. They emphasised the need for adequate funding, training and support for EHOs.
- RM noted that with the that the DNP case investigation was led by Food Standards Scotland with the support from Falkirk Council's Environmental Health department and Police Scotland. The successful conviction in this case was due to partnership working.

- RM said that the whole issue around local authority delivery has been recognised by Food Standards Scotland. Their SAFER initiative is a top priority which is looking to redesign the food law delivery and assurance framework. He thought that the Local Authority Environmental Health departments are so important because they are the boots on the ground but they can't deal with everything.
- HG acknowledged the ongoing work stream at the Food Standards Agency and Food Standards Scotland regarding EHOs and their recruitment and retention. She emphasised the role of the FDF in equipping its members and the wider food industry with tools to protect the food supply chain. This includes sending out weekly alerts to members to ensure they are aware of any issues. She noted the importance of supply chain knowledge using trusted suppliers.
- There was a discussion on the issue of animal byproducts (ABP) after Ann Packard asked a question. It was highlighted how important it was to ensure that illegal ABP did not enter the human and animal feed chains and that this was something that FSS was looking at as a priority area over the next period.
- There was a conversation around the need for public awareness and consumer responsibility. It was emphasised that if citizens suspect food fraud, it indicates a failure in the system. The discussion also pointed out the challenges faced by SMEs, corner shops, and online food services, which lack the technical teams of larger retailers.
- The topic of whistleblowing was discussed. The importance of protecting whistleblowers and ensuring their information is directed to the right place was highlighted. The conversation also mentioned the existing hotlines and the collaboration between different food crime units in the UK.
- Simon Macdonald inquired about the role of food labelling regulations in preventing food fraud, specifically mentioning the honey industry and the use of syrups to dilute genuine honey.
- CE noted that honey is a widely used ingredient in various foodstuffs and is a global commodity. Most honey is produced in China or South America, particularly Brazil, where production costs are much lower than elsewhere. While the dilution of honey with syrups is now easier to detect due to advancements in science, there is still a high likelihood that honey labelled as coming from a specific geographic origin may be mixed with honey from China or other regions. This highlights the importance of knowing supply chains and ensuring they are from bona fide sources to protect both businesses and customers.
- Wendy Barrie highlighted the impact of food fraud on consumer confidence and the importance of food authenticity. She questioned the labelling of Scottish farmed salmon and the use of 'fake farms' by retailers.

- Fiona McCauley addressed concerns about the labelling of Scottish salmon and the difference between Scottish smoked salmon and smoked Scottish salmon. She emphasised the importance of legal labelling and the protection of the PGI status.
- Ruth Watson discussed the issue of honesty on menus and the potential harm to producers' brands when restaurants falsely claim to use their products. She asked about the role of regulators in tackling this issue. RM noted that it is best to report issues like that to the local authority or through the Scottish Food Crime Hotline.
- Jules Griffin asked about the role of technology in addressing food fraud and ensuring food safety. This led to a discussion where various technological approaches were mentioned, including digitisation of supply chains, blockchain, sensor technologies, and spectroscopy. These methods can help track and verify the authenticity of food products throughout the supply chain. For instance, digitisation and blockchain can improve traceability, while spectroscopy can provide fingerprints of food items to detect adulteration.
- The conversation also touched on the importance of using a combination of tools and techniques to ensure food authenticity. Routine testing of products against control samples was emphasised as a crucial part of the process. Additionally, the use of machine learning to analyse spectroscopic data was mentioned as a promising approach to identify anomalies in food products.
- Ifeyinwa Kanu discussed the potential of using spectroscopy for household food analysis and the importance of empowering consumers with technology to detect food fraud.
- CE noted the challenges of testing complex foods, such as ready-to-eat meals. He said that it is often too late to test these foods for adulteration once they are already prepared. However, he recognised the potential of spectroscopy as a valuable technique for detecting food fraud. Spectroscopy provides a fingerprint of the food, and when combined with machine learning, it can identify anomalies in the food's composition. He shared the example in the UK where mustard was contaminated with peanuts. Although this incident was due to poor manufacturing processes rather than fraud, spectroscopy was able to detect the contamination by analysing the fingerprint of the mustard.
- There was a conversation on the issue of food insecurity and the redistribution of food. It was noted that food manufacturers prioritise the safety of the food they supply, regardless of the distribution channel. There was a discussion about the socio-economic aspects of food crime, with a particular emphasis on the vulnerability of certain groups to food fraud.
- Sally Measom, Company Shop, highlighted that the risk to their consumers is not higher because they purchase from main manufacturers who have robust technical teams. She also mentioned the potential opportunity in the space of food surplus intervention, where non-compliant products could be relabelled and redistributed instead of being wasted.

- Ann Packard asked about the availability of public statistics on successful prosecutions related to counterfeit printing of labels, particularly in the context of food crime. RM raised various points including the challenges in obtaining accurate crime statistics for food-related offenses, as victims often do not realise they have been affected. He also highlighted the importance of investigating the root causes of food crime to prevent future occurrences and the need for detailed analysis of vulnerabilities in the food supply chain.

5. AOB

No other business was noted.

6. Dates of further meetings in 2025

The meeting dates have been set for 2025, these are as follows:

- 14 May 2025, 6pm
- 10 September 2025 (AGM), 6pm