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1 **The anatomy of ‘So-called Food-Fraud Scandals’ in the UK 1970–2018:**
2 **Developing a contextualised understanding.**

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9 **Abstract.**

10 In the last four decades, the food industry in the United Kingdom has been subject to a
11 considerable number of so-called “food-fraud scandals”. These incidents mainly relate to actual
12 or alleged fraudulent activity which has resulted in public outcries about the criminality and
13 industry malpractices which may underpin them. An analysis of these ‘scandals’ reveals that
14 there is a ‘scripted’ nature to both their revelation and resolution, which can be modelled to
15 help better understand how to investigate and theorise these incidents in context. This approach
16 enables a better, more nuanced understanding of how to read the signs that link an incident to
17 a given modus operandi and as a consequence enables relevant actors to take more appropriate
18 and timely responsive actions, especially in the midst of a scandal narrative. Eight food related
19 incidents are scrutinised, some termed scandals, and others that whilst receiving local or
20 national media attention were not framed in the associated discourse as ‘being scandals.’ These
21 case studies demonstrate the contextualised anatomies of each specific incident to then identify
22 the associated scripted themes and responses. The framework developed as an output from this
23 research is of value in recognising the stages and nuances of a food-fraud scandal narrative.

24 **Keywords:** food industry, scandals, scripts, narratives, food-fraud, criminality, industry
25 malpractice

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33 **Introduction.**

34 In the call for papers the editors of this SI, Nicholas Lord, Wim Huisman and Letizia Paoli
35 articulate that with few notable exceptions (e.g., Croall, 2007, 2010, 2012a; Spink and Moyer,
36 2011, 2013), ‘food-crimes’ and in particular food-fraud, have only recently started to receive
37 substantive empirical attention from the criminological community (Lord et al. 2017a; Spencer
38 et al. 2018). Croall (2012b) examines food production and its long-standing association with
39 illegality and criminality and find that the problem is associated with a number of inter-related
40 phenomenon including impotent regulation; soft regulatory policies; ambiguous food labelling;
41 poorly resourced inspectorates; a declining number of inspections and tests; occasional
42 prosecutions and ‘paltry’ sentences; and the trenchant resistance of the food industry (Croall,
43 2012b). Food-fraud is a complex activity, but is often articulated as food misrepresented or
44 tainted for economic gain (Southey, 2019) when in fact the mode of operating has many other
45 facets. Lord and Pouli acknowledge the work carried out by food science scholars in
46 collaboration with criminologists (van Ruth, et al. 2017a. 2017b; Yang et al. 2019). However,
47 mention must be made of a body of research from management scholars carried out in the last
48 eight years in conjunction with agricultural, policy and food scientists (Smith and McElwee,
49 2013; Smith, 2015; Manning and Smith, 2015; Somerville et al. 2015; Manning et al. 2016;
50 Smith and McElwee, 2016; Smith et al. 2017a; 2017b; McElwee, et al. 2017; Soon et al. 2019;
51 Smith and McElwee, 2021). One challenge in contextualising this field of dual study, food-
52 fraud, is perhaps the persistent viewpoint in criminology literature and the alternative non-
53 criminological focus of food science publications that feature much of the contemporary
54 research.

55 As Lord et al. (2019) articulate food-crime is a broad construct that incorporates, for example,
56 white-collar and occupational criminality (i.e. criminal businesses; corporate crime (i.e.,
57 monopolistic commercial organisations); and organised crime (i.e., criminal gangs operating

58 for the purposes of economic gain – Paoli and Vander Beken, 2014; Von Lampe, 2016;
59 Manning et al. 2016). Although contemporary academic interest has been driven by large-scale
60 ‘scandals’, such as the 2013 European Horsemeat incident (see Smith and McElwee, 2021) the
61 study of food-crime has a long history. Food-crime incidents of this nature when reported in
62 the press are commonly referred to as scandals (Smith, 2015; McElwee et al. 2017; Smith and
63 McElwee, 2021). In their study of the Horsemeat scandal, Smith and McElwee examine several
64 international prosecutions arising out of the events and identify areas of commonality which
65 indicate structural weaknesses and a need for greater coordination in investigation, legislation
66 and policy coordination. As stipulated by Lord et al. these scandals revive policymakers’
67 determination to ‘do something about it’ in order to protect consumers and the integrity of the
68 food system (Lord et al. 2017a) and for food-crime to be a national and international priority
69 policy focus (Lord et al. 2017b). The rising concern among supranational organisations at the
70 increasing number of food-fraud incidents and the sophistication of some of the activities at
71 exploiting structural weakness within the food industry and food supply chain has led to the
72 development of strategies and priorities for responding (European Parliament 2013: 7).

73 However, even before drafting new policies and legislation, there is clearly a need to examine
74 how scandals unfold and to explore their anatomy. We argue that the very use of the term
75 scandal itself to describe the endemic criminality, lies at the root of the malaise in dealing
76 effectively with such crimes. A scandal is ‘*an action or event regarded as morally or legally*
77 *wrong and causing general public outrage*’ (Oxford Dictionary). Gottschalk and Benson
78 (2020) define a corporate scandal as an unexpected, publicly known and harmful event that has
79 high levels of initial uncertainty, interferes with the normal operations of an organisation, and
80 generates widespread intuitive and negative perceptions externally. When an incident becomes
81 a crisis, turns then into a scandal, and goes public, corporations must explain and justify what
82 appears to have happened. The nature of such accounts are invariably evasive and deceptive

83 and intended to buy time or stall the scandal and reduce any entropy fuelled by public attention.
84 The use of the word ‘scandal’ infers that there is something shocking and immoral in the
85 behaviour that causes moral panic (Cohen, 1972) and public outrage. A scandal is also a
86 publicised instance of transgression that runs counter to social norms, typically resulting in
87 condemnation and discredit and other consequences, such as bad press, disengagement of key
88 constituencies, the severance of network ties and decrease in delivering to key performance
89 indicators (Piazza and Jourden 2018). Scandals are a key mechanism used by media, pressure
90 groups and social movements to demand inquiries and investigations into alleged corruption,
91 incompetence and immorality. Scandals can have a corrosive impact on reputational standing,
92 credibility and legitimacy. Abbots and Coles (2013) argue that debates that entail a moral
93 discourse reflect moral panic, food crises and positioning that develops along ideological lines
94 suggesting particular types of customers (low income), type of producer (industrialised,
95 complex systems) and type of retailer (discounter, corporate business) are culpable or
96 blameworthy. Further Ibrahim and Howarth (2016) when reflecting on the Horsemeat incident
97 as a scandal, use value-laden terms such as denial, implicated, chain of blame, and cultural
98 taboo.

99 One of the problematic issues of dealing with food-fraud, and so-called scandals, is not the
100 narrative itself, but the complexity of the incidents and the length of time it takes to investigate
101 and prosecute them. In some cases, the gestation period from offence to successful prosecution
102 can be six years (Smith and McElwee, 2021). This has the effect of obscuring the data because
103 until conviction the facts remain sub-judice, and often anecdotal. There is no doubt that food
104 crime and in particular food-fraud incidents undermine trust and confidence in individual
105 businesses of varying size, and in consumer confidence in the integrity of the supply chain.
106 Although the scandal cases which result in prosecution are dealt with by the authorities and
107 police, supply chain violations are usually mediated by non-legal means using industry driven

108 penalties and sanctions e.g., being delisted as a supplier even where police are not involved
109 (Smith and McElwee, 2021). Thus, the ‘food-fraud scandal’ transcends disciplinary boundaries
110 and is an under-researched and under-theorised area of collaborative criminology of global
111 relevance. Food-fraud, like the businesses and supply chains in which it is perpetuated, is
112 transnational, cross-border, cross jurisdictional and exploits the economic motivation of
113 business and the criminal actors involved in the industry to behave badly, and also unlawfully.
114 There is a blurring of boundaries between the business and criminal worlds here which is
115 worthy of further scrutiny.

116 We suggest that the use of the term ‘scandal’ in food-fraud incidents (and other forms of
117 criminal and non-regulatory practices of the food industry) is overused and perhaps harmful
118 because it obfuscates the endemic criminality inherent in food-related crime and although it
119 may help focus attention, it may also hinder investigation, and may not lead to the allocation
120 of appropriate resources. In the ‘food-fraud scandals’ considered herein there is an inevitable
121 focus on the alleged or actual criminal and commercial logic behind their commission. Our
122 research question is “*How does the introduction of the term ‘scandal’ and its related scripts*
123 *influence media accounts of food-fraud?*”

124 To provide answers to this, we examine eight incidents which occurred in the UK between the
125 1970s and 2018. Through the analysis of these incidents, we provide a novel approach that
126 reveals the underlining script of the ‘scandals’ to develop a theoretical framework which aims
127 to help relevant actors, such as regulators and investigators, in their responses against alleged
128 food-fraud. By doing so, we contribute by expanding the literature in the field of food-crime
129 and, specifically, food-fraud through a cross-disciplinary perspective that, going beyond the
130 criminological aspects of food-crime, intersects media, business and supply chain approaches.
131 Moreover, the paper fits the purposes of this Special Issue. A further aim is to identify common
132 factors in the anatomy of such criminal activity, especially those termed as scandals, that can

133 then be used to inform required policy and legislative change. We use this (ex)position to
134 develop a theoretical contextualisation as articulated by Storm and Wagner (2015) and
135 Gottschalk and Benson (2020). We examine the causes, nature and organisation of the food-
136 fraud incidents and discuss their affects whilst exposing common trends, patterns and features
137 of such incidents that can be used to shape societal responses and create a more efficient and
138 effective criminal justice response. One of the findings of the study into the Horsemeat scandal
139 by Smith and McElwee (2021) is that there is an implicit connection between the fraud and the
140 food system itself in that there is obvious collusion between criminal businesses, industry
141 insiders and organised crime which provide opportunities for food-related criminal behaviours
142 and for responding to these harmful activities.

143

144 **Reviewing the literature on scandals in food-crime.**

145 **Understanding the structural elements of a typical scandal:** In such a scandal, the media
146 perpetuate a number of hypothesis in relation to who is involved in, or behind the criminal
147 activity associated with the story (Smith and McElwee, 2021). Quite often, these ‘hypothesis’,
148 remain unsubstantiated or based on common perceptions or stereotypes and are far from the
149 truth. The study of Smith and McElwee (2021) into the Horsemeat scandal highlight the
150 scripted anatomy and phases of how the scandal unfolded. In a typical scandal, the press (or a
151 whistle-blower) raises the alarm, expressing outrage which manifests itself as a ‘moral panic’.
152 If the scandal is properly addressed by the authorities and a coherent explanation or apology
153 issued by the offending parties, then it is short lived and journalists move on to other stories, if
154 not it can remain headline news for weeks, even months (Gottschalk and Benson, 2020). In
155 trying to deal with the scandal, CEOs and politicians vie for exposure and broadcast ‘sound
156 bites’ vilifying the perpetrators as shadowy criminals, but not industry insiders (Lord et al.

157 2014: Smith and McElwee, 2019). Astute CEOs and politicians acknowledge flaws,
158 but distance themselves from the scandal itself. This narrative, or script, can result in customer
159 and suppliers boycotting products. Some products can be removed from supermarkets in a
160 formal product recall. In this initial phase, there is intense media and social media activity
161 (Gottschalk and Benson, 2020). The affected companies work hard with public relations
162 companies and lawyers to counteract financial and reputational damage and engage in damage
163 limitation, and either go into denial mode or issue apologies, disclaimers and denials of
164 knowledge or claiming to be victims of the scandal (see Ibrahim and Howarth, 2016;
165 Gottschalk and Benson, 2020). Major companies have more power and resources than small
166 and medium sized enterprises (SMEs) and can thus better weather the media storm (Madachie
167 and Yamoah, 2017). A media storm describes the deluge of media attention resulting from the
168 scandal which can cripple and/or lead to a paralysis of a company's media capabilities
169 especially as most SMEs do not have professional media advisors.

170 In most cases, the companies suffer both financial and reputational damage. Astute companies
171 navigate the media storm and survive the scandal. If the scandal does not abate, the
172 investigating authorities investigate. Invariably, such investigations proceed at a slow pace and
173 very few 'scandals' result in court cases. Also, invariably the accused claim 'bad record
174 keeping' practices or claim to be poor businessmen. Scapegoating often occurs and 'managers
175 or employees are blamed, and mistakes and errors are alluded to. Scapegoating involves
176 'intentionally taking advantage of others, sacrificing the careers and livelihoods of others for
177 the good of an individual, or organisation' (Kent and Boatwright, 2018, p.515). The aim of this
178 strategy is to distance themselves from blame and often excuses such as personal, or health
179 issues are introduced. In long running scandals, journalists repeatedly revisit the scandal to
180 report on developments thus keeping the scandal in the public consciousness. Smith and
181 McElwee (2021) argued that the term 'scandal' is over-used to describe and excuse criminal

182 greed and poor management practices that pervade the food-industry and that the mechanism
183 must be challenged and treated as ‘organised’ systemic industry and supply chain criminality.
184 The perpetuation of such criminality encompasses a moral as well as a legal element in that
185 they involve the deliberate use of deception by lying and cheating (Green, 2006).

186 Gottschalk and Benson (2020) opine that corporations occasionally find themselves mired in
187 scandals that threaten their reputations, profitability and even survival in attempting to
188 responding to and manage the crisis (See also Piazza and Jourden, 2018). Corporations and
189 their executives develop and publicise explanations of their involvement that are designed to
190 forestall or mitigate the potential risk to reputation (Scott and Lyman 1968). These explanations
191 in a typical scandal are termed as *accounts*. An account in this context is a statement made by
192 an actor to explain unanticipated or untoward behaviour that is subject to an evaluative inquiry
193 by others. Gottschalk and Benson (2020) identify four different types of accounts. These are
194 1) denials; 2) justification; 3) excuses; and 4) apologies. These can be distilled into two further
195 main types. The first is an initial denial of wrongdoing, followed by a partial admission of
196 wrongdoing and scapegoating. The second is an initial obfuscation of wrongdoing, followed
197 by a continuation of the denial, accompanied by a partial acceptance of wrongdoing and
198 scapegoating. These mechanisms allow corporations to weather serious scandals.

199 According to Gottschalk and Benson (2020), there are two general forms of accounts,
200 justification and excuses. In a justification, the actor admits responsibility, but denies its
201 pejorative and negative content. In an excuse, the actor admits the act in question is wrong, but
202 denies having full responsibility for it. In an apology, the actor admits violating a rule, while
203 accepting the validity of the rule. The apologist expresses embarrassment and anger at self
204 (Goffman, 1971). This allows the actor to split his or her behaviour into two parts: the part that
205 is guilty and the part that disassociates itself from the offending behaviour. This is a valuable
206 technique for corporations, because unlike most accused, they can literally split themselves in

207 two and such accounts are a type of moral disengagement (Bandura, 1999). Accounts allow
208 organisational employees to assert that they were only following a superior's order or company
209 policy. Such accounts are seldom spontaneous but are scripted by external parties such as
210 solicitors or accountants. In a serious scandal, corporations often employ external companies
211 to advise and draft accounts and thereby avoid the appearance of sounding too self-serving. A
212 well scripted account lays the groundwork for separating corporate and individual interests.
213 Corporate accounts also help address the activities of multiple individuals simultaneously. The
214 purpose of an account is to obfuscate facts and distance the corporate body from the
215 consequences of blame. A well scripted response minimises too, the loss of social approval,
216 legitimacy and reputation. Corporations also have the opportunity to acknowledge their
217 wrongdoing at a later date and can apologise for their behaviour and resolve to mend their
218 ways. This has the effect of insulating them from closer scrutiny and criminal investigation.

219 **Understanding the anatomy of scandals:** Scandals and particularly their anatomy are subject
220 to academic scrutiny. For Storm and Wagner (2015), scandals are exposed in the media and
221 discussed in the research literature without any deeper reflection on their specificities or
222 development. Scandals have a socio-economic and socio-political element to their unravelling
223 and because of this it is possible to develop a deeper sociological understanding of the
224 downsides of scandals. Although they examined scandals in a sporting context, using a
225 communications theory framework and insights from discourse theory, their framework and
226 findings are relevant to this work. The Storm and Wagner model utilises a 5-step model which
227 encompasses – 1) transgression; 2) publicly observed dislocation destabilising the social order;
228 3) resulting in a moral (and judgemental) communication; 4) an increase in environmental
229 pressure for appropriate action; and 5) calls for an institutional solution. However, a scandal
230 does not always unfold in this sequence. Furthermore, Brooks et al. (2017) articulate that such
231 anatomies utilise alternative scripts and explanations to divert attention from the real causes of

232 a phenomenon (see also Smith and McElwee, 2021). The purpose of the scripts is to act as
233 ‘neutralisation techniques’ (Gottschalk and Smith, 2011) to limit potential damage to the
234 person, or company, caught up in a scandal. The storylines contained in these so-called
235 “*scandal scripts*” have explanatory power and can contribute to the creation of “*amplification*
236 *spirals*”.

237 The main argument upon which this review of the literature rests is upon the idea that
238 understanding the dynamics or anatomy of food-related scandals can help to comprehend the
239 ripple effect (or incident amplification phase) produced in terms of media and institutional
240 attention (see Kasperson et al. 2003). Building upon the literature, we argue against the overuse
241 of the term 'scandal' as this does not help with dealing with actual food-crimes effectively and,
242 on the contrary, it maintains the perception of the incidents at the level of 'scandals' instead of
243 considering them as 'criminal practices'. We embrace the argument according to which 'scandal'
244 is often used to excuse criminal greed and cover poor management practices, shifting the
245 attention from the 'grand criminal machinations' and the underlying issues of the food industry.
246 Instead, these practices should be treated as being systemic criminal practices happening inside
247 the food sector. Therefore, the formulation of a new theoretical appreciation that analyses the
248 anatomy of food-scandals can help relevant actors to tackle food-fraud.

249

250 **Methodology and the anatomy mechanism.**

251 The methodology used in this study is qualitative in nature and utilises ‘script and textual
252 analysis’ (Allen, 2017) and ‘close readings’ (Amernic and Craig, 2006) of media reports. It
253 also entails the use of the ‘Anatomy’ structuration and mechanism to unpick common outlines
254 and scripts to develop a theoretical contextualisation (Lakner et al. 2005; Allen, 2010; Storm
255 and Wagner, 2015) and to make sense of the incidents. Having understood the structuration

256 and anatomy of scandals literature, as described above, it was necessary to conduct analysis of
257 the incidents and choose an appropriate framework.

258 Selecting an appropriate framework: We utilise the Storm and Wagner model and the
259 framework of Gottschalk and Benson (2020) relating to denials; justification; excuses; and
260 apologies. This allowed a theorised model of the typical food-fraud scandal to emerge complete
261 with common embedded themes and scripts.

262 The data collection framework: As active scholars in rural criminology and food-fraud we
263 were already aware of many of the documented ‘so-called scandals’ herein. Nevertheless, to
264 aid the case selection we conducted a netnographic-search of the internet using the terms ‘food-
265 fraud’ and ‘food-scandals’ (Kozinets, 2015). We restricted the search to UK cases to ensure
266 compatibility and contextuality. This produced a list of 50 such incidents over the timeframe
267 of the study (1970s-2018). We stopped on reaching 50 cases because of the large amount of
268 data to be analysed manually. After reading the raw data from the media reports [mainly
269 newspaper and magazine articles located on the internet] we excluded those that did not
270 specifically mention the word ‘scandal’ to arrive at our purposeful sample of eight incidents
271 reported below. They all relate to the food supply chain in one form or another. The data was
272 coded manually by using key words and themes using post-it notes to arrange and rearrange
273 emerging patterns and themes. The data was subjected to an iterative thematic analysis by
274 compiling, disassembling, reassembling, interpreting, and concluding the analysed data
275 (Castleberry and Nolen, 2018) to ensure methodological rigour. ‘Textual analysis’ techniques
276 were used (Allen, 2017) and ‘Close Reading’ (Amernic and Craig, 2006) to uncover the key
277 messages in relation to the embedded scandal scripts. Any scenario which did not involve close
278 media scrutiny was also excluded. This was a deliberate systematic strategy because it allowed
279 a multiplicity of scandal types to emerge. For example, some scandals occurred locally, others
280 nationally and internationally involving cross-border trade. Some refer to fraudulent activities

281 whilst others to a breach of hygiene and safety regulations. This permitted us to reach a
282 saturation point in relation to the scandal scripts. Alternative strategies were considered to
283 documentary research strategies (Scott, 1990) such as accessing court records, but this was
284 deemed to be too time intensive. We acknowledge that often alleged food-fraud incidents make
285 it to the media and eventually become 'scandals' by chance or because someone involved might
286 know a journalist seeing some potential for the scandal to create media attention. Developing
287 an understanding of the 'anatomy structuration' used is essential in this research in not only
288 understanding why the scandal is described as such, but also in producing a theorised
289 contextualisation because it becomes about the scandal narrative and how to manage it rather
290 than the wider issues of organised criminality.

291

292 **Analysing the incidents for scripted elements of a scandal.**

293 An internet search (netnography, Kozinets, 2015) of relevant incidents, some of which were
294 termed scandals, assisted by our professional pre-understanding and awareness of the UK food-
295 fraud scene was undertaken. We took a wider view of what constitutes a food-fraud to include
296 pre-food supply chain contexts. In this regard, the scope of fraud considered here is that food-
297 fraud is simply the illegal and intentional deception for economic gain using food (Spink et al.
298 2017). Table 1 provides a description of eight food related incidents located in their given
299 scenarios and reporting their outcomes. The table was created from published narratives of the
300 incidents.

301

302

303

304

305 **Table 1. Food incidents: the emerging scandal narrative**

| Incident | Brief description of scenario | Incident narrative |
|--|---|---|
| <p>Operations Fox and Aberdeen. Operation Fox. (Circa 1970 to 1990). Operation Aberdeen (2000-2001).</p> <p>Sources; Smith and McElwee, (2017).</p> <p>Both national scandals.</p> | <p>Operation Fox was reported in the press at the time as a scandal. Up to 1000 tons of rotten meat for use as pet-food was redirected into the human food chain. This ongoing fraud involved a very expensive and time-consuming investigation. This food-fraud had been ongoing, in various guises since the 1970s. Investigations found that profit sharing arrangements were in place throughout the organisation, the vast majority of whom were licensed or legally registered. The perpetrators although known to the authorities were primarily businessmen/ industry insiders. The fraud was economically motivated. Operation Aberdeen was a large-scale operation, involving the sale of 450 tonnes of diseased poultry from Denby Poultry Products into a range of retail outlets and schools. It was also one of the UK's most substantial poultry crimes to be investigated and successfully brought to trial. It involved the cooperation of 150 local authorities and a major police investigation. The investigation took 3 years to complete and was led by Amber Valley Borough Council; Environmental Health; Trading Standards; Ministry of Agriculture, Fisheries and Food; the Meat Hygiene Services; Food Standards Agency (FSA); and Derbyshire Constabulary (Dawson, 2018). The investigation, started on 7th December 2000 due to anonymous whistleblowing to Derbyshire Environmental Health that unfit poultry meat, was being sold via intermediaries into the legitimate food supply chain (Dawson, 2018). DPP was raided by authorities. The investigation costs to the police totalled £1.75m. In this case, waste carcasses were purchased from slaughterhouses for around £25 per tonne and sold back into the human food chain at around £1500 per tonne.</p> | <p>The organised nature of the crimes in Operation Fox was referred to in Hansard as a sophisticated meat mafia that peddles dangerous meat in a way that other criminals peddle dangerous drugs (Hansard, 2003). In relation to the Storm & Wagner framework, it was an obvious transgression of food safety laws that led to a publically observed dislocation of the social order particularly as the unfit meat was used in schools and hospitals. The scandal led to a call for an institutional solution and ultimately led to the creation of a new UK Food Standards Agency model. The Operation Aberdeen trial resulted in six defendants being given custodial sentences totalling six years. It was subsequently discussed in Parliament (Hansard, 2003) and failings in the regulatory and legal systems were pointed out, as was the lack of coordination between some of the agencies involved. It was described as a 'highly organised conspiracy' (Muir, 2003, p.2). Calls from the police for a new meat crime offence to be introduced were supported by other bodies such as the Chartered Institute of Environmental Health (CIEH) and Lacors, but the FSA maintain that EU regulations limit their powers to amend the existing UK Food Safety Act. In relation to the Gottschalk and Benson scandal framework, in both scandals there does not appear to have been much attempt made by the accused to issues denials, offer justifications or excuses let alone apologies and the scandal rhetoric was owned and perpetuated by the media.</p> |
| <p>Eurovet fraud scandal. (Circa 2000 to 2011). Source Smith & Whiting (2013) and Gov.UK</p> <p>A national, international and cross-border scandal.</p> | <p>This scandal was related to Europe's biggest ever illegal veterinary medicine business in which more than £6 million of products were smuggled to the UK, risking the health of people and animals. The crime was masterminded by a farmer and his wife who sold unauthorised and prescription-only medicines to more than 4,000 British customers from properties in Kent, France and Belgium. It involved a Europe wide network supplying black market veterinary products to British farms, stables, kennels and veterinary surgeries. This commercial scale fraud involved the incorrect use of cheaper medication of unknown origin and dubious quality. It evaded taxes and flouted animal health regulations. The fraud was perpetuated via a complex series of businesses registered across Europe and sales were facilitated via telephone, fax and online sales. The investigation was begun in 2006 by Defra Investigation Services and resulted in raids and seizures in the South of England and in France. Computerised customer records were seized which indicated that the turnover between January 2004 and May 2007 was £5.6m. The ringleaders moved their operations to Belgium and continued trading until 2008 when that end of the operation was raided and closed down. The fraud was economically motivated.</p> | <p>This incident resulted in 13 persons including: the ringleaders, driver, bookkeeper, wholesaler, three major customers and a money launderer being convicted of various offences The two ringleaders were sentenced to 28 and 20 months respectively. Other defendants were sentenced to terms of 12 months to two years including suspended sentences. Confiscation orders were also imposed. In relation to the Storm & Wagner framework, it was an obvious transgression of veterinary safety laws which destabilised public faith in the veterinary/food industry. The scandal had a moralistic undertone relating to the potential danger to the public. It led to pressure for an institutional solution by tightening up UK veterinary regulations. In relation to the Gottschalk and Benson scandal framework in the Eurovet case there does not appear to have been much attempt made by the accused to issues denials, but the legal representatives of the accused did offer justifications and excuses but no apologies. The justifications and excuses related to the industry wide perception that the UK veterinary Regulations were too harsh and restrictive, and that the accused were merely trying to access goods and services at a more reasonable price which their European peers had access to on a free market basis. Again, the scandal rhetoric was owned by the press and</p> |

| | | |
|---|--|---|
| | | perpetuated by the media but due to the protracted nature of the case was a long-running scandal. |
| <p>The Onefood Limited organic fraud scandal (2001-2007) (Sources: Daily Mail, 2009; Evening Standard, 2009; Visick, 2009).</p> <p>A national scandal.</p> | <p>Onefood Limited was a Northamptonshire food business selling natural, organic and ethical food to high-end retailers such as Fortnum and Mason. It was the first custodial sentence for organic food-fraud in the UK (Visick, 2009). The prosecution was brought by Northamptonshire County Council Trading Standards with the support of the FSA who estimated that 28% of ingredients purchased by the business were not organic (Visick, 2009). It was alleged that over a six-year period the accused bought non-organic food from food retailers (Tesco and Waitrose accessing 2-3 times a day) and sold it with associated claims making £500,000 as a result of the fraud (Evening Standard, 2009). Also trading as Swaddles Organic the accused told staff to dispose of the supermarket packaging, invoices falsified and “non-organic chickens were entered into records as “game” which cannot be certified as organic” (Evening Standard, 2009). Products included salmon, pork pies and chickens with purchases identified as “non-stock” to evade identification and verification by the certification bodies Soil Association and Organic Farmers and Growers Ltd (Daily Mail, 2009). This meant 50% of supplies could circumvent formal systems without any record of stock movements (Food Law News, 2009). Test purchases of salmon described as organic contained a synthetic additive (astaxanthin) used in farmed salmon feed to influence colour (Visick, 2009). The use of a forensic accountant identified at least 41% of ingredients purchased were non-organic and 28 invoices had been invented to suggest organic chicken had been purchased (Food Law News, 2009). The fraud was perpetuated by businessmen and the primary aim of the fraud was to generate additional revenue and was economically motivated.</p> | <p>The owner, his wife and their operations manager pleaded guilty to fraudulent trading. The company with annual sales between £0.5 and £2.5 million ceased trading in March 2008 and went into liquidation (Visick, 2009). The owner was jailed for 27 months, and the other two were given suspended sentences and 150 hours community service (Evening Standard, 2009). In relation to the Storm & Wagner framework, it was an obvious fraudulent transgression of both food safety and trading standards regulations. It destabilised public faith in the quality of food they were purchasing and thus in the food industry. The scandal had a moralistic and a judgmental undertone. The case did not generate pressure for an institutional solution. In relation to the Gottschalk and Benson scandal framework in the Onefood scandal there does not appear to have been much attempt made by the accused to issue denials, but legal representatives of the accused did offer justifications and excuses, but no apologies. Again, the scandal rhetoric was owned by the press and perpetuated by the media but was short lived.</p> |
| <p>Free range egg fraud Worcestershire, UK (2004-2006) (Sources: BusinessLive, 2010; Dolan, 2010; Pidd, 2010; Suart, 2012; Manning & Kowalska, 2021).</p> <p>A national international and cross-border scandal.</p> | <p>This fraud incident related to Heart of England Eggs Unlimited, Bromsgrove, Worcestershire. It was alleged that they supplied eggs to major packing companies who then sold them on to supermarkets including Sainsbury’s, Morrisons and Tesco and small retailers. Over a two-year span, June 2004 to May 2006, around 100 million eggs were mislabelled (caged battery eggs and industrial eggs being labelled as free range or organic eggs; and selling foreign eggs as British) with a profit of multi-millions of pounds (Pidd, 2010). The crime was masterminded by the owner who used another of his companies, that sold organic eggs, to disguise the accounting fraud. In court, the owner claimed to be a middleman who purchased eggs imported from France and Ireland and then sold them as British industrial eggs which are eggs that do not meet the standards for retail sale but can be used in processing e.g., after pasteurisation. The fraud was highlighted as a result of rumours in the industry and the concern of investigators from the Egg Marketing Inspectorate. When inspected eggs bore the marks of being laid on wires. Many drivers also reported concern over practices on relabelling and then redistribution. Three other defendants were originally charged with conspiracy to defraud, but the charges were “ordered to lie on file” after prosecution was not taken forward, one being an Irish supplier, brother and another his wife (BusinessLive, 2010; Dolan, 2010). Suart (2012) notes that although criminal proceedings were being brought against him in 2008, he did not plead guilty until the first day of his trial in 2010. The fraud was perpetuated by businessmen and was economically motivated.</p> | <p>This incident resulted in the owner being sentenced to three years in prison and pleaded guilty to three charges of fraudulent accounting, because records were altered to disguise the origin of the eggs and then additional paperwork described the status of the eggs. The judge imposed £250,000 in costs and a requirement to meet a confiscation order to surrender £3 million of the profit or risk another six and a half years in prison (BusinessLive, 2010) and the owner was banned from being a company director for seven years (Pidd, 2010). In relation to the Storm & Wagner framework, it was again a fraudulent transgression of both food safety and trading standards regulations. It destabilised public faith in the quality of food they were purchasing and thus in the food industry. The scandal had a moralistic and a judgmental undertone, but the case did not generate pressure for an institutional solution as it was deemed criminal activity. In relation to the Gottschalk and Benson scandal framework in the free-range egg fraud there does not appear to have been much attempt made by the accused to issue denials. The justifications and excuses related to this activity were that it was an example of sharp practice, not criminality. Again, the scandal rhetoric was owned by the press and perpetuated by the media and was short lived.</p> |

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| <p>The Horsemeat scandal (circa 2013). Smith & McElwee, 2019)</p> <p>A national, international and cross-border scandal.</p> | <p>This incident is related to the substitution of cheaper horsemeat in food to replace beef products. It was an EU wide problem, but the major incident considered here was centered around UK/Irish food supply chains and their outlets. This is a long running fraud which continues to this day with recurrent EU notifications on the EU Rapid Alert System for Food and Feed (RASFF database) for malpractice associated with the labelling or documentation associated with horsemeat. The fraud was perpetuated mainly by businessmen, but the collusion with organised crime cannot be ruled out. The fraud was economically motivated.</p> | <p>This incident resulted in four high profile prosecutions of businessmen in the UK between 2017 and 2019 as well as several cases in France and Belgium. In relation to the Storm & Wagner framework, it was an obvious fraudulent transgression of trading standards and statutory laws which destabilised public faith in the quality of the food products and cause public outrage. This sense of public outrage may have been due to the fact that in the UK the horse is not associated with being a food source, unlike other countries in Europe. The scandal had a moralistic and a judgemental overtone and generated public pressure for an institutional solution. It led to two commissioned inquiries in the UK and is still generating calls for institutional change. In relation to the Gottschalk and Benson scandal framework, with the ‘Horsemeat scandal’ there were rapid and decisive denials from many associated companies in the meat supply chain followed quickly by apologies from many companies for not being aware of the practice. Also, legal representatives of the numerous accused did offer justifications and excuses based on the premise that the accused were businessmen who had been duped by others or had cash flow problems. Typically, the justifications and excuses related to the fact that the accused were formerly honest businessmen. However, during this time the scandal rhetoric was owned by the industry and by the general public as well as the media and for this reason it became a long running public scandal.</p> |
| <p>The Russell Hume incident (2019). Source: The Sun Newspaper.</p> <p>A national scandal.</p> | <p>This food incident involved meat supplier Russell Hume Limited being subject to a media probe after a surprise visit from Food Standards Agency (FSA) officers allegedly uncovered hygiene and food safety failings including mislabelling at its sites. As a result of this its main customer removed all its meat products from its menus. The company quickly went into administration. Russell Hume Limited were meat, game and poultry specialists based in Derby, UK. The company supplied major hotels, restaurants and pubs across the country, and had an annual turnover of circa £50 million. The FSA closed down the companies premises across the UK (FSA, 2018). All of the companies’ customers found alternative suppliers leading to financial problems for the organisation. The cost of the investigation to the FSA is said to be £750K (White, 2018). The incident was termed a scandal in multiple media channels. The alleged infringements were to extend the shelf-life of the products to generate additional revenue.</p> | <p>The company was unable to react quickly enough at the onset of the ripple effect of the incident. This led to the company quickly going into administration with a loss of 270 jobs. Following the Storm & Wagner framework, it was potential transgression of trading standards and statutory laws which destabilised faith in the quality of the meat products. The scandal had a moralistic and a judgmental undertone but did not generate pressure for an institutional solution. In relation to the Gottschalk and Benson scandal framework in the ‘Russell Hume scandal’ the accused did issue justifications and attempted to ‘ride out the media storm’ but because of the quick and decisive actions of other companies in the supply chain, and the loss of business and revenue the company failed. Although the scandal rhetoric was owned by the press and perpetuated by the media and was short lived it was also owned collectively by the industry who appear to have acted both quickly and decisively to put distance between themselves and the media storm.</p> |

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| <p>The 2 Sisters incident (2017) Source: The Guardian.</p> <p>A national scandal.</p> | <p>This incident involved allegations of poor hygiene standards, food mislabelling and the alteration of documentation at the 2 Sisters food plants, one of the largest suppliers of chicken to retail supermarkets. The scandal broke as a result of a joint Guardian newspaper and ITV investigation which released what was stated in the scandal narrative as undercover video evidence. This publicity resulted in intense media scrutiny over a period of weeks and also an FSA investigation which failed to find evidence of breaches but did comment on some isolated instances of non-compliance with 2SFG quality management systems procedures (Monaghan, 2018). The scandal narrative associated with the incident led to a temporary suspension of the plant operations. The company also faced parliamentary scrutiny and censure from customers who issued their own apology and reassurance (Wood, 2017). Again, multiple media channels termed this incident a scandal. The alleged offences were associated with businessmen, managers and employees. The primary motive for the alleged infringements was stated as being to reduce financial loss and was thus economically motivated.</p> | <p>This incident led to a short-term loss of reputation for the organisation. It led to a range of customers boycotting the products and in the short term moving to alternative suppliers. The company issued an account that they were shocked and distressed by the allegations recorded on the short film and stated they were working around the clock to get at the truth (Goodley, 2017). They later stated that they had initiated a new staff training programme. In relation to the Storm & Wagner framework, it was an alleged transgression of trading standards and food-hygiene regulations, where the scandal narrative escalated quickly. This is a clear example of an incident amplification phase where the degree of entropy is fuelled by the scandal narrative. There was little destabilisation of the food sector in this case because of the swift action of the authorities and the organisation. The scandal narrative had a moralistic and a judgmental undertone but did not generate pressure for an institutional solution. In relation to the Gottschalk and Benson scandal framework, the company did issue clarification statements, and justifications in an ultimately successful attempt to 'ride out the media storm'. It did help that the scandal related to operational practices relating to food hygiene which were reviewed and updated promptly, with the organisation working closely with the regulator. There was prompt and appropriate ownership of the issues and no denials. Although the scandal rhetoric was owned by the press and perpetuated by the media and was short lived it was also owned collectively by the company who acted both quickly and decisively to address the allegations and the potential impact.</p> |
| <p>Illegal slaughterhouse Devon (2008-2013) So called "Slaughtergate" scandal. (Source: EHN News, 2017).</p> <p>A local-regional scandal.</p> | <p>This localised scandal in Devon, UK related to a 'slaughterman' illegally butchering thousands of animals in an unhygienic abattoir. He admitted and was found guilty of 16 food hygiene offences at Exeter Crown Court. One tonne of unfit meat was seized when his premises. Animal waste stored next to fresh meat and other body parts were burned on a bonfire outside the doors of the cutting room. There was a lack of basic washing or hygiene facilities at the illegal slaughter site and blood and offal was smeared over the walls. The illegal business slaughtered animals from hundreds of farms all over Devon and returned them to farmers in freezer-ready packs. The offences, perpetuated by a sole trader, were economically motivated.</p> | <p>The slaughterman was jailed for eight months suspended for 2 years, ordered to do 180 hours community service and repay £40,000 he allegedly made in profit. This incident did not reach the national press and only circulated locally in the southwest of England. In relation to the Storm & Wagner framework, it was an obvious transgression of trading standards and food-hygiene regulations. There was little destabilisation of the industry in this case because of the swift action of the authorities and the localised reach of the impact. The scandal had a moralistic and a judgmental undertone but did not generate pressure for an institutional solution because the offender was dealt with and the incident was seen as an isolated case. In relation to the Gottschalk and Benson scandal framework the accused did not issue any denials, but his legal representative did suggest that the accused was merely supplying a much-needed illicit service. Because it remained a localised scandal there was no media amplification of the facts and circumstances it was a short-lived scandal. In this case the scandal rhetoric was instigated and perpetuated by the media and not by the industry.</p> |

307 From an analysis of the details, the incidents where some were labelled as scandals, all differ
308 in details of actual or alleged offences committed (from breach of hygiene regulations through
309 to fraud), but have similar causes, nature, organisational aspects, harms, common trends,
310 patterns and features in terms of the scandal narrative. The cases demonstrate the range and
311 complexity of the incidents ranging from international, national to localised and illustrate how
312 the narrative of scandals (Horsemeat Scandal, 2013; 2 Sisters and Russell Hume in 2019) has
313 emerged in recent times. The major difference between incidents is that many did not attract
314 media attention until the organisation was prosecuted even when the financial level of the fraud
315 was significant running into the tens of millions. In the incidents termed a scandal, media
316 attention during the investigation phase meant that the ‘scandal narrative’ grew alongside the
317 investigation. Reading the cases as scandals and applying the frameworks of Storm and Wagner
318 and Gottschalk and Benson allowed some general observations to be made. From an analysis
319 of the data, several phases emerged as detailed below. The phases of a scandal are of vital
320 importance in terms of the ripple effect of the media attention. The phases are:

321 **Transgression:** It is important whether when the societal norm transgressed, or allegedly
322 transgressed, by the organisation(s) is a crime against the individual or the government. Several
323 of the instances in Table 1 are examples of high-level fraud so the individual is indirectly
324 affected. Others, those termed ‘scandals’ are transgressions against the individual e.g.,
325 mislabelling or misrepresentation. The larger the organisation(s) the more resources they have
326 to frame their account through denials, justifications and apologies to delay the scandal
327 narrative from unravelling.

328 **Shaming:** This phase is both public and in traditional media and on social media and serves to
329 further destabilise the escalating situation and it can lead to embarrassment and reputational
330 losses.

331 **Moral Reckoning:** This entails being shunned by peers and by customers and others in the
332 supply chain, all of whom seek to distance themselves from the emerging scandal.

333 **Retribution:** This phase sees the introduction of delisting, and the temporary and permanent
334 loss of contracts and if the company involved in the scandal does not have control of the scandal
335 narrative, then there is a danger of the company going into administration.

336 **The Solution:** If the organisation(s) involved have managed to keep control of the scandal
337 narrative, then it is necessary to offer the public and the industry a plausible account and a
338 neutralising solution whether by scapegoating managers or employees or offering up the
339 resignation of a high-profile person. It is also at this phase that organisation(s) can cease trading
340 if the narrative is not accepted by the public and the industry.

341 From analysis, a rudimentary framework emerged for scrutinising food-fraud incidents and
342 scandals (Figure 1).

343 **Take in Figure 1**

344 The framework is helpful to commentators, such as journalists, solicitors and industry
345 consultants, media spokespersons and investigators alike, whether in law enforcement, private
346 investigators or corporate fraud investigators, in conceptualising and understanding the
347 theoretical elements of scandals in order to establish what type of scandal it is, what type of
348 institutional asymmetry exists, what type of account is being espoused and what phase in the
349 scandal the narrative is at present. Different scandal types require different investigative
350 strategies to be utilised and the institutional asymmetries in play will determine how the
351 narrative plays out. This framework is useful because how the narrative unfolds or is spun by
352 the media, depends on these factors as well as which account type (Gottschalk and Benson,
353 2020), and strategy being deployed. Also, at what stage in a scandal the narrative arises will
354 determine the outcome and options available to investigators. Developing a more intuitive

355 understanding of the unfolding narratives surrounding a scandal enables more nuanced
356 understanding of the situation and its consequences. There are some incidents, such as those
357 involving errors or faux pas, which are often short lived and involve mistakes or
358 miscommunications and are contained prior to potential prosecution. In contrast, so-termed
359 scandals can quickly involve individuals such as politicians or individuals making comments
360 which in retrospect, they wish they had not.¹ Often what is not said, is of more significance
361 than what is being claimed. In a scandal there should ‘by rights’ be some form of scandalous
362 behaviour present whether it is illegal, immoral or amoral, but in food-fraud scandals it is often
363 difficult to identify during the investigation phase if truly scandalous behaviours have occurred.
364 Moreover, the media and public scrutiny aspect of the scandal is important, because if the press,
365 television and social media coverage is intense then the scandal becomes a media storm
366 (Madachie and Yamoah, 2016) with its own rules and norms. However, if public scrutiny and
367 interest is not present the incident may not amplify into a scandal and will lose energy (entropy)
368 and be short lived.² The intensity of the legal scrutiny is important and the timescale a scandal
369 narrative rumbles on for will determine whether more investigative resources are ploughed into
370 the affair by media and regulatory bodies. This was evident in the Horsemeat and Eurovet
371 scandals.

372 For the purpose of analysis, the narrative account is distinguished from the businesses
373 and their reaction to the incidents, discovery of the incidents, from the situated context of a so-
374 called scandal. That is if it is called a scandal by the media, government or the business it then

¹ We are minded here of the MP Edwina Curry and her comments on eggs and Salmonella and Businessman Bernard Matthews comments during the now infamous ‘Turkey Twizzler’ scandal. In 1988, Currie at the time a junior Health Minister warned the British public that most of the egg production in the UK were affected by Salmonella. This ill-advised statement had immediate ramifications and overnight caused egg sales in the UK to plummet. The comments all but ended her political career and angered farmers and others involved in the food supply chain. The scandal involving Matthews which was dubbed “turkey-twizzler gate” by the press in 2005 resulted from a PR disaster which was sparked by celebrity chef Jamie Oliver’s move to rid school dinners of the company’s processed meat products. Matthews survived that scandal but after several other business setbacks eventually sold his business to the 2 Sisters group.

² It also depends on the quality of the investigative journalism and the journalists per se and whether their pre-ordained hypothesis are both correct or capable of being sustained by the evidence.

375 can be perceived as not representing day-to-day practice so somehow the incident is an
376 aberration, which thus must be forgettable, if not forgivable, as the supply chain returns to
377 business as usual.³ Some public scandals are so fast moving there is a need for organisations
378 to have policy documents in place to identify actions to take should they arise especially as the
379 speed at which the scandal is attenuated will defused the entropy around events and also
380 dictates its ultimate outcome. If the enquiry / investigation is dragged out long enough the
381 scandal becomes an incident (or an affair) as remembered (retrospective) rather than
382 an incident as lived. From a perusal of the relevant literature and from the process of analysis
383 we developed a conceptual model of the typical anatomy of a food-fraud scandal (Figure 2).
384 These phases emerged from a narrative overview of the data analysis stage.

385 **Insert Figure 2**

386 The model that was iteratively developed from this study has a number of distinct and
387 distinctive elements:

388 **Shock/incident or event:** At the centre of the ripple effect is the shock, incident or event that
389 begins the whole process. The initial impact or trigger will cause either a minor ripple or a
390 major disturbance in the food supply chain. There are a number of factors that will influence
391 this *incident amplification phase* or as we describe it the “ripple effect”. These amplification
392 factors are both socio-political and social-economic in nature. Example of these factors have
393 been shown throughout the case studies explored in this paper. The factors include the degree
394 of media engagement with the incident (shock) and the amplification effect this can cause,
395 whether there has been any deaths or significant public health harm to individuals or whether
396 there has been a significant economic loss. For some events the incident will have none or a
397 minor amplification phase and as a result, the incident will not be termed a scandal. However,

³ In this respect, it is helpful to turn to the lessons learned from the Grenfell Tower scandal because in that case the untold narratives centre around the scandalous maladministration of the incident and its investigation (see <https://www.tandfonline.com/doi/abs/10.1080/13604813.2018.1507099>)

398 if the scandal narrative begins within the supply chain, government, media or the general
399 public, it will cause a cascade effect and the entropy or energy of that cascade effect will be
400 fuelled by the scandal narrative itself. The amplification of the narrative will in turn continue
401 to create greater entropy fuelling the cascade effect.

402 Perceptions of a given scandal e.g., the 2013 Horsemeat scandal will exist at a contemporary
403 and retrospective level. The accepted contemporary discourse and justice narrative may be
404 based on the immediate impact of the incident and the strength of the associated scandal
405 narrative. In turn this will fuel media perceptions of the degree of public interest if the event
406 was scandalous, dangerous, or a maligned threat. The timespan of this acute phase will fuel the
407 narrative and if the food supply chain can address a particular issue and quickly bring the
408 supply chain back to a stable state, the event is ultimately seen as less scandalous. Regulatory
409 and media investigations will continue the entropy and if the case is complex then it can be
410 many years before a prosecution, if any, will come to court. If the time scale of investigation
411 occurs over several years, then a retrospective discourse and narrative begins, and this
412 retrospective discourse can over time become the accepted discourse. We argue that if
413 retrospective analysis at this stage is based on a lesser perception of harm because the incident
414 is now an “incident as remembered” rather than an “incident as lived” this can result in lower
415 penalties if and when justice is served. This conceptual model serves to illustrate how the
416 scandal narrative unfolds and it provides a framing against which further food-fraud related
417 scandals can be mapped.

418 Another facet of the scandal narrative is that it does not deal with the underlying industry and
419 market related issues leading to the problems highlighted. If the media suspect mafia style
420 criminal exploitation but the only accused held to account are lower-level companies in the
421 food supply chain, then the prosecution of SME owners may point to industry malpractice not
422 grand criminal machinations. It may well be that the accused SME owner was poorly equipped

423 to deal with the ferocity of an unfolding scandal, masking the criminal behaviour of others
424 involved in the side-lines. Also, some organisation are too big to be held to account and allowed
425 to fail because they employ too many people; food manufacturing being the largest
426 manufacturing sector in the UK. Allowing organisations to fail can have disastrous economic
427 and political consequences for local economies. We acknowledge that food-fraud incidents and
428 scandals are complex phenomenon and involve other, external processes operating alongside
429 the scandal narrative, such as police activity, prosecutorial resources and commitment to the
430 case, evidence collection, etc. These may be undisclosed so are not included by the media
431 within the scandal scripts.

432 Another issue, or observation relates to the fact that the structure of most criminal
433 investigations centres around proving particular charges and thus when a case can be made a
434 ‘cut off point’ is reached where others involved on the periphery are used as witnesses or the
435 inquiry stops before they are involved. For example, in the Eurovet scandal, there were a large
436 number of farmers and small businessmen who were involved as customers in the supply chain
437 who were not investigated. This can lead to a situation where the motivation to continue
438 engagement in illegal supply chain activities is still present. Also, no attempt is made to pursue
439 an investigation or inquiry into the factors behind the scandal itself to ensure there is no repeat
440 of it in the future. Thus, to answer the research question - *“How does the introduction of the*
441 *term scandal and its related scripts influence media accounts of food-fraud?*

442 It is apparent from the analysis of the data that the introduction of the term scandal can
443 obfuscate the underpinning element of organised criminality whereby the sole purpose of the
444 offences is not to breach industry specific regulations but to fraudulently make more money.
445 Concentrating on the elements of a food-fraud scandal and its media perpetuated amplification
446 spirals could hide the inherent aspects of the actual criminality that has occurred.

447

448 **Concluding thoughts**

449 All the food related incidents considered here involve, or allegedly involve, industry
450 malpractice such as the alteration of documentation and the collusion of owners, managers and
451 employees. One of the main challenges of tackling large-scale criminal incidents is the level of
452 resource necessary to investigate the complex chain and also optimising the investigatory
453 knowledge across the specific areas of expertise required. It is evident that the media
454 investigations and criminal investigations are separate and separable and occur simultaneously
455 and influence each other. Both the media and the authorities could learn much from sharing
456 their differing investigative capabilities. An understanding of the anatomy of so-called scandals
457 can be of use to academics, journalists, politicians, policy makers and law enforcement
458 personnel. Although we argue that food-fraud scenarios are too often misrepresented as
459 isolated incidents, there is still a place for the scandal as articulated by Elliot “Quite often it
460 takes a scandal before anybody takes any action” (Brooks et al. 2017; Southey, 2019). The
461 eight case studies are drawn from existing public sources as access to other evidence was not
462 available to the researchers and this is a limitation of the study.

463 A more nuanced understanding of how scandal narratives emerge and use of scandal
464 frameworks (such as Figure 1) would help investigators better understand the different stages
465 of a scandal, and account types, asymmetries that occur and how the reporting of them is
466 influenced by particular aspects of the script. Whilst it cannot be used to help prevent and detect
467 food-fraud it will help to better mediate the rhetoric surrounding such incidents and the
468 discourses that emerge and iteratively develop during an investigation. Investigators can look
469 beyond the accounts and rhetoric of scandal scripts and see the underlying criminality and
470 criminal behaviours, which characterise food-fraud scandals. There is an urgent need to create
471 an over-arching all-encompassing fraud offence to cover the complexity and nuances of food-
472 fraud rather than continue to prosecute them under industry specific regulations. This

473 argument, particularly the institutional intervention angle is key to moving the scandal
474 paradigm forward by initiating a judicial review of how such frauds are investigated and
475 resourced. We believe that the term ‘scandal’ whilst it brings attention to the issues discussed,
476 does not immediately target resources to the problem during an incident and because a scandal
477 by its very nature is influenced by the *incident amplification phase* or as we describe it the
478 “ripple effect”.

479 This analysis of food related incidents herein has indicated that the literature on food-
480 fraud consists of three main literatures: the criminological; the scientific; and the business
481 literature on entrepreneurship and supply chain issues. It is apparent we must take a holistic
482 view of the complex activity instead of focusing on specific disciplinary approaches. There is
483 a pressing need to form inter-disciplinary research teams and work together to remap the
484 literature and create new, more nuanced, models, such as those proposed in this work that have
485 real life applicability and purpose. This SI is a potential new beginning for food-fraud
486 scholarship and goes some way towards taking cognisance of non-criminological scholarship.
487 An understanding of the anatomy of such scandals can be of use to academics, journalists,
488 politicians, policy makers and law enforcement personnel to help them deal with future so-
489 called scandals. Although we argue that generally food-fraud scenarios are too often
490 misrepresented as isolated aberrations instead of the criminal actions they are, there is still a
491 place for the reporting of genuine ‘scandals’. We argue that once a food-fraud scenario is
492 identified as a scandal that the accounts developed, especially where they drive a media storm
493 can create opacity that shields the intentional actions that underpin the incident. These scandals
494 can be driven by fraudulent transactions, but the real scandal is that they can result from weak
495 regulatory enforcement, insufficient surveillance and inadequate systems of scrutiny and
496 investigation across the UK and Europe in particular.

497

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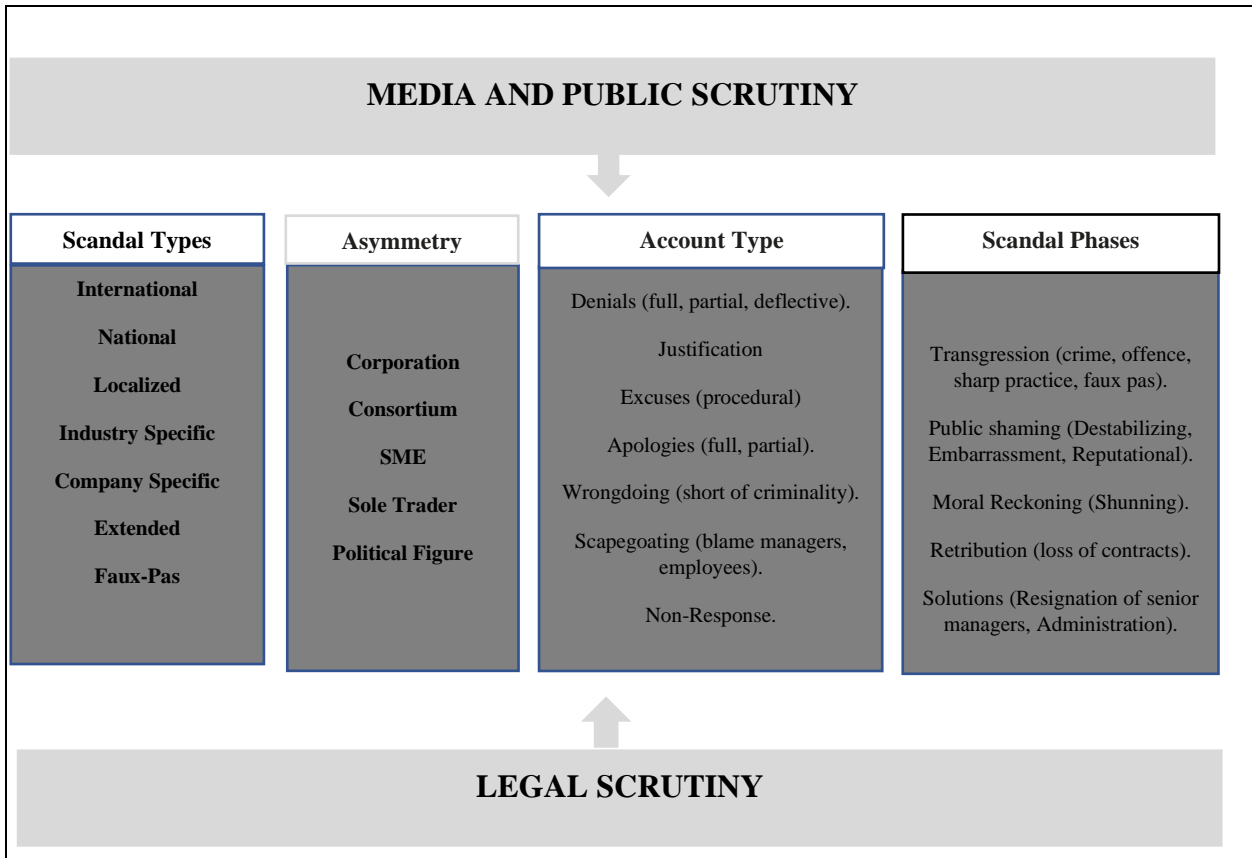


Figure 1 – A Framework for Scrutinising Food Related Scandals.

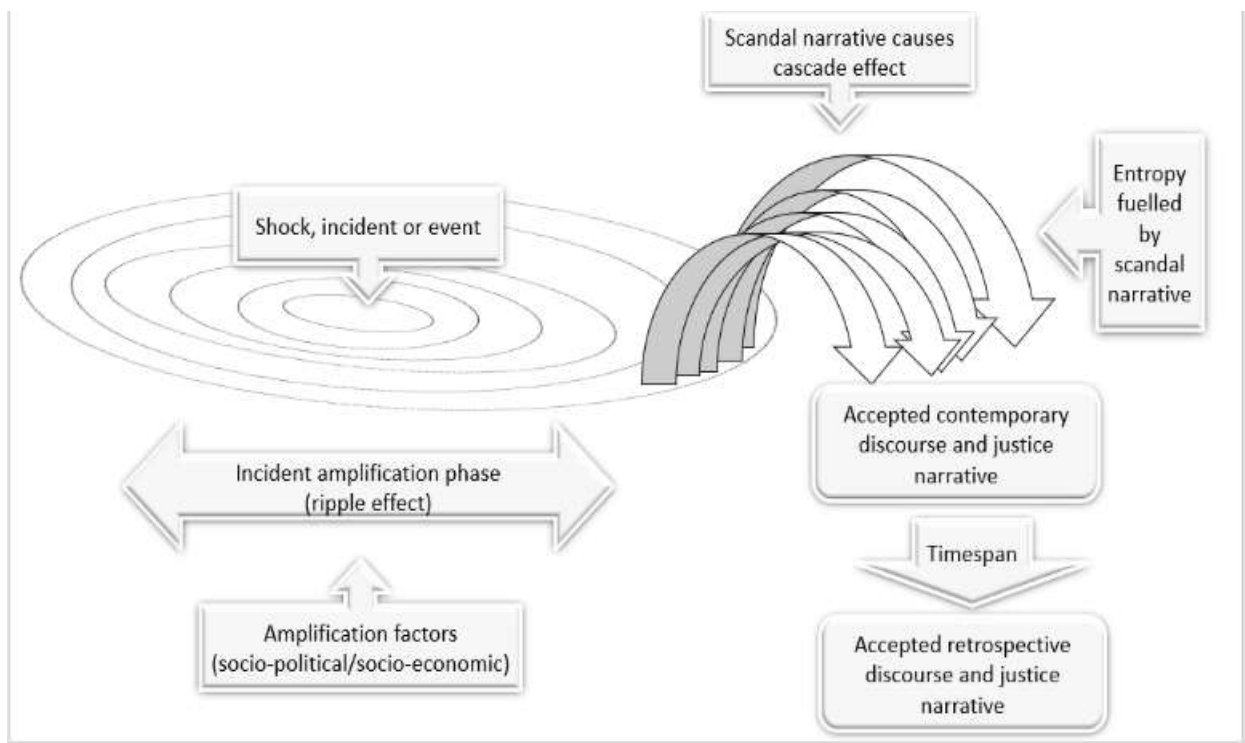


Figure 2. Conceptual model of the anatomy of a typical food-fraud scandal.