The anatomy of 'So-called Food-Fraud Scandals' in the UK 1970–2018: Developing a contextualised understanding.

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Abstract.

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

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

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Introduction.

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

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

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

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

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

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

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

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

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

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

Reviewing the literature on scandals in food-crime.

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

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

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

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

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

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

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

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

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

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

Methodology and the anatomy mechanism.

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

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

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

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

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

Analysing the incidents for scripted elements of a scandal.

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

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

Incident	Brief description of scenario	Incident narrative
Operations Fox and Aberdeen. Operation Fox. (Circa 1970 to 1990). Operation Aberdeen (2000-2001). Sources; Smith and McElwee, 2017). Both national scandals.	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.	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.
Eurovet fraud scandal. (Circa 2000 to 2011). Source Smith & Whiting (2013) and Gov.UK A national, international and cross-border scandal.	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.	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

		perpetuated by the media but due to the protracted nature of the case was a long-running scandal.
The Onefood Limited organic fraud scandal (2001-2007) (Sources: Daily Mail, 2009; Evening Standard, 2009; Visick, 2009). A national scandal.	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.	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 issues 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.
Free range egg fraud Worcestershire, UK (2004-2006) (Sources: BusinessLive, 2010; Dolan, 2010; Pidd, 2010; Suart, 2012; Manning & Kowalska, 2021). A national international and cross-border scandal.	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 defendents 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.	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 issues 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.

The Horsemeat scandal (circa 2013). Smith & McElwee, 2019) A national, international and cross-border scandal.	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.	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.
The Russell Hume incident (2019). Source: The Sun Newspaper. A national scandal.	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.	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.

The 2 Sisters incident (2017) Source: The Guardian. A national scandal.	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.	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.
Illegal slaughterhouse Devon (2008-2013) So called "Slaughtergate" scandal. (Source: EHN News, 2017). A local-regional scandal.	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.	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 destablisation 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.

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

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

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

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

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

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

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

Take in Figure 1

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

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

For the purpose of analysis, the narrative account is distinguished from the businesses and their reaction to the incidents, discovery of the incidents, from the situated context of a so-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.

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

Insert Figure 2

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

Shock/incident or event: At the centre of the ripple effect is the shock, incident or event that begins the whole process. The initial impact or trigger will cause either a minor ripple or a major disturbance in the food supply chain. There are a number of factors that will influence this *incident amplification phase* or as we describe it the "ripple effect". These amplification factors are both socio-political and social-economic in nature. Example of these factors have been shown throughout the case studies explored in this paper. The factors include the degree of media engagement with the incident (shock) and the amplification effect this can cause, whether there has been any deaths or significant public health harm to individuals or whether there has been a significant economic loss. For some events the incident will have none or a 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)

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

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

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

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

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

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

Concluding thoughts

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

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

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

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

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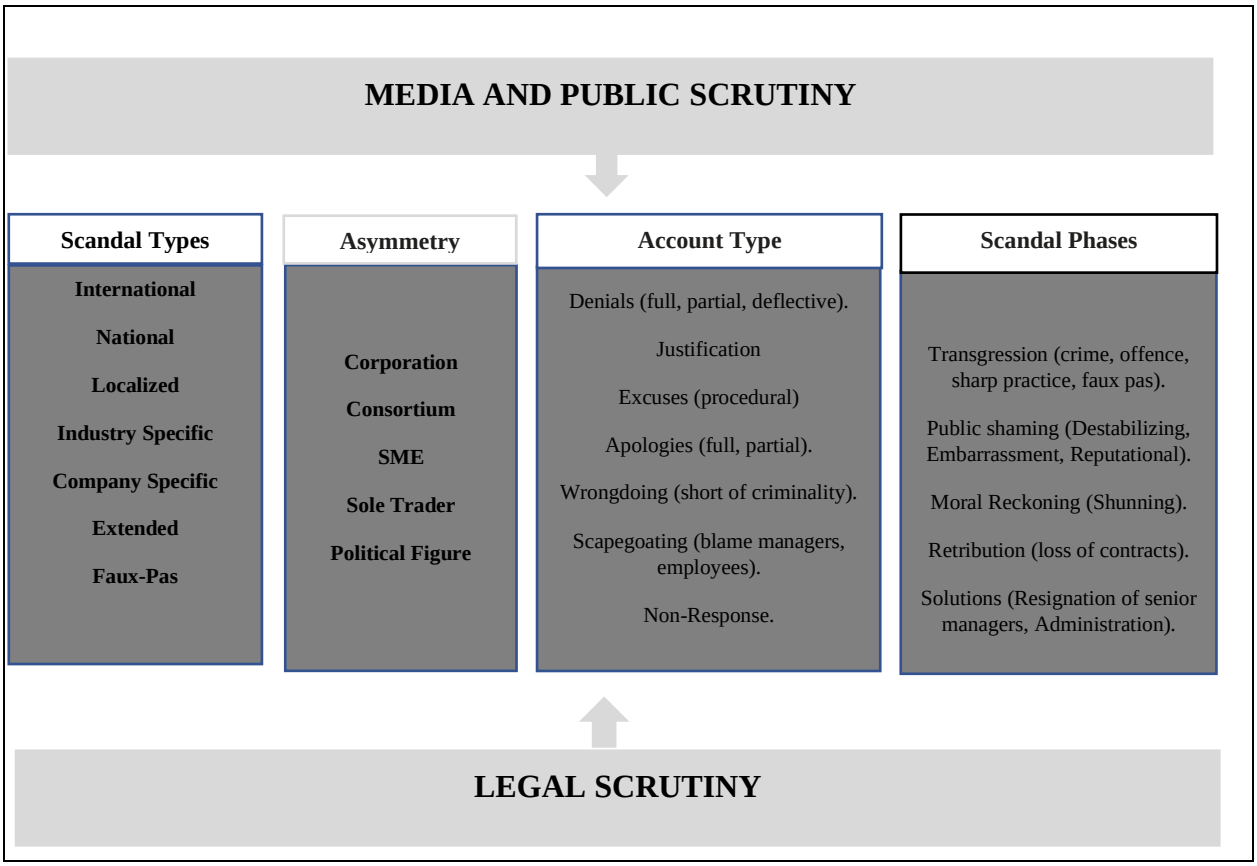

Figure 1 – A Framework for Scrutinising Food Related Scandals.

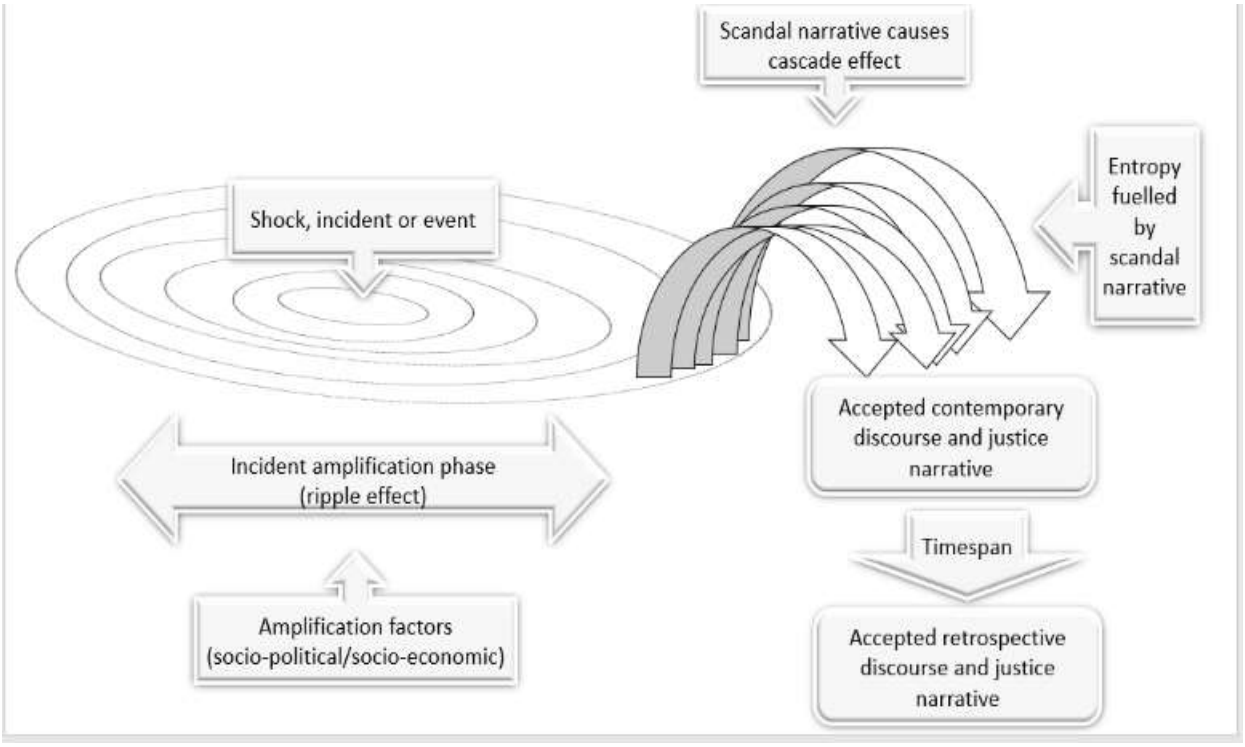

Figure 2. Conceptual model of the anatomy of a typical food-fraud scandal.