



INTERPOL

EUROPOL

# Operation OPSON VIII

## Analysis Report

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## KEY ELEMENTS

- More than 90,000 tons of allegedly organic products inspected by the authorities. In many cases, the products turned out to originate from conventional agriculture and not from organic farms;
- 67,681 checks, 3,055 criminal and 3,266 administrative cases open;
- 3,313 persons arrested and 78 Organized Crime Groups disrupted and 373 pieces of equipment used for illicit production of food and drinks seized;
- The total estimated value of the seizure is around USD 130,282,422.79 (EUR 117,503,559.91).
- During OPSON VIII, the total volume of seizures amounted to approximately 50,000 tons, of which alcohol was the most seized food item totalling about 33,688.08 metric tons of such products seized.
- The next two categories seized were cereals, grains and derived products (3,628.14 metric tons) and condiments (1,135.92) metric tons of illicit products seized.
- In addition, more than 6,618.38 metric tons of cosmetics, medicines and medical devices, footwear, clothing, accessories, handbags, wristwatches, belts, wallets, sunglasses, cigarettes, toner cartridges, soap or tooth paste, which were not specifically targeted, were seized during the operation when found to be illicit (side seizures, evaluated at around USD 6,199,864).
- During the checks carried out during OPSON VIII in Nairobi area, Kenyan authorities found and confiscated counterfeit USD currency. The suspects, a group of four Kenyans were found with more than 13 million USD which were confiscated.
- 335 livestock (sheep, cattle, pigs, horses) prior to processing were seized, 86 of them being subjected to abusive therapeutic treatments, which lead to meat contamination with high level of pharmacological residues.
- The foodstuff seized posed serious threats to public health, e.g. non-alcoholic drinks likely to cause food poisoning, alcoholic beverages potentially causing bone marrow suppression, toxicity and allergenic responses, meat and meat products unfit for human consumption, coffee and tea containing dangerous level of pesticides;



# OPERATION OPSON VIII

## KEY FIGURES



**OPSON VIII**  
Targeting counterfeit and sub-standard food and drink



**+ 90,000 tons** of allegedly organic products inspected



**373 pieces of equipment used** for illicit production of food and drink seized;



**USD 130,282,422.79** total value of the seizure



The total volume of seizures amounted to approximately **50,000 tons**



**67,681** checks



**78** organized crime groups disrupted



**3,055** criminal cases  
**3,266** administrative cases



**3,313** persons arrested

## INTRODUCTION

Operation OPSON<sup>1</sup> deals with counterfeit and substandard food and beverages with a particular emphasis on products which represent a risk for public health.

This report presents a detailed analysis of the results conveyed by the participating countries, corresponding to enforcement actions undertaken in the operational phase of OPSON VIII.

Thanks to an enhanced data-reporting framework, to the OPSON NPOCs<sup>2</sup> global network and to increased efforts in reporting from all actors, the data provided, the interpretation of the statistics elaborated by the dedicated INTERPOL analysts can be considered as much more in-depth and accurate compared to older reports.

Although the report does not intend to reflect precisely all activities carried out during the operational phase in all countries, the intelligence analysis carried out offers a clear-cut picture of the criminal phenomenon, as well as several recommendations.

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<sup>1</sup> OPSON (ὄψων) means food in ancient Greek. The operation has started in 2011, with 10 countries.

<sup>2</sup> National Point of Contact.

## 1. OBJECTIVES, TIMELINE, LEGAL FRAMEWORK AND PARTICIPATING COUNTRIES

### 1.1 Objectives, timeline and legal framework

The implementation of the OPSON VIII operational plan covered four months, between 01 December 2018 and 30 April 2019. The objectives of the operation, consisted of:

- protecting public health;
- fighting against organized crime groups involved in the trade of fake and substandard food;
- enhancing international cooperation;
- enhancing national cooperation between LEAs and food regulatory agencies; and
- enhancing cooperation with private partners from the food and beverage industry.

Both international and national legislations concerning intellectual property rights and food safety were enforced during the operation.

Based on the threat assessment done in OPSON VII, alcohol, meat, cheese and olive oil were found to have the higher risk of counterfeiting; therefore, INTERPOL recommended the countries to concentrate on these commodities. The countries from the European Union, based on their own risk analysis, additionally targeted food labelled as organic (in cooperation with DG Health<sup>3</sup>), coffee and food supplements containing 2,4-Dinitrophenol (DNP)<sup>4</sup>.

### 1.2 Participating countries, EUROPOL and INTERPOL

The following countries<sup>5</sup> participated in OPSON VIII:

Albania, Australia, Austria, Belarus, Belgium, **Botswana**, Bulgaria, Burundi, **Cambodia**, Cameroon, **Chile**, China, Croatia, Cyprus, **Republic of the Congo**, Czech Republic, Denmark, Ecuador, Eritrea, **Eswatini**, Ethiopia, Finland, France, **Gabon**, **Gambia**, Germany, **Ghana**, Greece, Guinea Bissau, Hungary, India, Indonesia, Ireland, Italy, Jordan, Kenya, Latvia, Leshoto, Liechtenstein, Lithuania, **Republic of North Macedonia**, Malaysia, **Mauritania**, Republic of Moldova, Montenegro, **Namibia**, **Nepal**, Netherlands, Nigeria, Norway, **Paraguay**, Peru, Portugal, Romania, Russia, Rwanda, **Seychelles**, **Singapore**, Slovakia, Slovenia, **Somalia**, South Africa, South Korea, South Sudan, Spain, Sudan, Sweden, Switzerland, **Tanzania**, **Thailand**, Togo, Uganda, **Ukraine**, United Kingdom, United States of America, **Uruguay**, Zambia, **Zimbabwe**.

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<sup>3</sup> Directorate-General for Health and Food Safety is responsible for EU policy on food safety and health and for monitoring the implementation of related laws.

<sup>4</sup> 2,4-Dinitrophenol is an organic compound which is reported to cause rapid weight loss, however with potentially dangerous secondary effects (<https://www.ncbi.nlm.nih.gov/pubmed/21739343>).

<sup>5</sup> Please refer to Annex 1 for the list of participating countries and involved agencies. The countries in bold letters are countries participating for the first time.





## **2. SCHEDULE OF THE OPERATION**

Similar to last years, the operation was divided into three phases, which are described below.

### **2.1 Preparatory phase**

Operation OPSON VIII was launched during a meeting hosted by the INTERPOL General Secretariat in Lyon, France, from 7 to 9 November 2018. The event debriefed operation OPSON VII, by presenting the results and discussing the implementation of the operational phase. It also officially launched OPSON VIII with a discussion on new challenges, based on the results of the previous edition.

According to OPSON VII results, specific emerging trends have been illustrated, INTERPOL recommending to all countries to include checks, amongst others on illicit alcohol and meat, commodities which were found to pose a higher threat for human life and health based on the information from OPSON VI and VII.

The event gathered more than 100 representatives from police, customs, food authorities, regulatory agencies, patent and registration offices as well as representatives from the private sector and from international bodies.

A specific training and planning meeting for Operation OPSON has been organized from 13 to 14 of December 2018 in Harare (Zimbabwe) at Regional Bureau premises, for the countries from Southern Africa in order to get an increased countries' participation and sustain their capacity to fight against this trafficking by providing a more tailored workshop with local brand owners. The initiative gathered around 40 representatives from 14 countries of the area (Angola, Botswana, Cameroon, Congo, Congo DR, Eswatini, Gabon, Lesotho, Malawi, Namibia, Tanzania, South Africa, Zambia, Zimbabwe) and from several firms and organizations operating in the region.

An Operational OPSON VIII Asia Planning meeting was held in Bangkok, (Thailand) from 22 to 24 January 2019. It was the first for the new format for Operation OPSON with the focus on the Asia region and it was a chance for INTERPOL to get more of the countries in the region to participate in OPSON. More than 30 delegates from 12 countries attended the training, along with numerous investigators/representatives from industry. The majority of the countries at this meeting had not participated in OPSON before. The event gave all of them the opportunity to interact and allowed a free flow of information between the participants. Their respective presentations contributed to give the participants an idea of food and beverage products that could be counterfeited in the region together with the tools to investigate and stop the flow of counterfeit goods

The operational plan was disseminated via appropriate channels, SIENA and EPE (Europol channels) and the I24/7 system to the National Central Bureaus (INTERPOL channels), to all participants in November 2018.

### **2.2 Operational phase**

The operational phase spanned five months between 01 December 2018 and 30 April 2019.

As in previous editions, checks and investigations were carried out on high-risk entities in the food and beverage supply chains. Each participating country independently decided on the type and timing of controls established in a national operational plan.

#### **Role of INTERPOL and Europol**

During the operational phase, INTERPOL and Europol performed crosschecks against their databases and coordinated the dissemination of intelligence in order to support on-going actions.

The INTERPOL Command and Coordination Centre (CCC) provided round-the-clock support from 01 December 2017 to 31 March 2018, via the I24/7 system. The INTERPOL's Illicit Goods and Global Health Programme liaised with the National Central Bureaus (NCBs) in the participating countries exchanging information through INTERPOL.

The operational center supported OPSON VIII at Europol Headquarters during the entire operational phase.

At the end of the operational phase, participating countries sent all available results to INTERPOL and Europol for analysis.

### 2.3 Post operational phase

The results of the operational phase were to be sent to INTERPOL and Europol before 17 May 2018. Most of the participating countries respected this deadline. From May 2019 to October 2019, both organizations analysed the data transmitted, in order to assess the threat and identify best practices and areas of improvement.

A debriefing meeting was held on 7 and 8 November 2019, in Greece, to present the results and adopt the report, which was sent to all countries via the appropriate communication channels.

## 3. RESULTS OF THE OPERATION

This section comprises an overview of the seizures reported during Opson VIII, structured in order to answer several key analytical questions.

### 3.1 Statistical overview of the seizures

All participating countries carried out checks throughout their national territory. Of note is that the whole chain of supply received attention, seizures being made at production sites, during the transport phase or at the distribution and selling points of illicit foods and drinks. Law enforcement actions targeted all channels of distribution, including online sales and the activities carried out in the framework of OPSON VIII are as follows:

Illicit Goods Seized during OPSON VIII	
Unit of measurement	Quantity
Tons	6,994.6
Liters	33,156,888.15
Units	18,701,016.25

The total number of checks carried out during the OPSON VIII raised to 67,681, which is an increase of about 40 percent compared to last year. The 3,055 criminal cases initiated this year represent an increase of more than 55 percent, while the 3,266 administrative cases represent a three percent increase compared to OPSON VII.

The countries reported 3,313 persons arrested (more than 70 percent increase compared to last year), while the number of search warrants reported decreased more than 40 percent to 230 in OPSON VIII.

A notable increase observed this year is in the number of organized crime groups (OCGs) disrupted or affected by LEAs measures which increased to 78 in comparison to 49 last year.

In addition, 373 pieces of equipment used to manufacture counterfeit and falsified products have been seized, of which most of them in Russia.

The total approximated weight of all products seized during OPSON VIII is 50,076.08 metric tons, with a total estimated value of about USD 130,282,422.79 (EUR 117,503,559.91).

During OPSON VIII, similarly to last year, illicit alcohol was the most seized food item, totalling about 33,688.08 metric tons of such products seized. The category of cereals, grains and derived products came second with 3,628.14 metric tons of products seized while condiments was the third most seized food item totalling about 1,135.92 metric tons of illicit products seized.

In addition, more than 6,618.38 metric tons of side seizures were reported (illicit goods not targeted specifically during the operation, but found during the checks), mostly cosmetics and medicines and another 1,210.35 tons referred to mixed products (food and non-food items) seized together.

The countries reported a significant number of cases when the products posed danger for human health, amongst others, non-alcoholic drinks likely to cause food poisoning, alcoholic beverages potentially causing bone marrow suppression, toxicity and allergenic responses, meat and meat products unfit for human consumption, coffee and tea deemed unfit for human consumption because of exceeding level of pesticides or lots of other food items which were expired. In addition, 335 livestock (sheep, cattle, pigs, horses) prior to processing were seized, 86 of them being subjected to abusive therapeutic treatments, which lead to meat contaminated with high level of pharmacological residues.

Other illicit products seized outside the scope of the operation included cosmetics, medicines and medical devices, footwear, clothing, accessories, handbags, wristwatches, belts, wallets, sunglasses, cigarettes, toner cartridges, soap or tooth paste, products evaluated at around USD 6,199,864.

During the checks carried out during OPSON VIII in Nairobi area, Kenyan authorities found and confiscated counterfeit USD currency. The suspects, a group of four Kenyans were found with more than 13 million USD which were confiscated.

### **3.2 What type of illicit products have been seized?**

The descriptive analysis of the most important seizures in this part of the report will look to present the activities from a quantitative perspective but also from a frequency point of view<sup>6</sup>, with the aim at presenting a complex mosaic of what was seized for a better depiction of the goods confiscated and law enforcement activities implied.

#### **Alcoholic beverages**

Compared to last years, the general threat associated with this commodity is increasing, shows more complexity and higher quantities involved. The seizures this year are much higher than in 2018, however more aligned with the findings of OPSON VI (2017), when more than 29 million litres of illicit alcohol were seized worldwide.

Illicit alcoholic beverages were the most seized product in OPSON VIII. Reported in 633 cases, by 23 countries, mostly from Africa and Europe the quantities seized totaled approximately 33,000 tons of products, estimated at roughly USD 59 million.

The biggest quantities seized were wine products, however branded and unknown spirits were also very frequent amongst the seizures.

By quantity in 88 percent of the cases the seizures related to deceiving consumers reasons (but 2 percent of the number of reports), while by number of reports 66 percent of the seizures were done for fiscal infringements (but under 1 percent of the total quantity). This means that a few cases accounted for the biggest quantities of illicit alcohol seized for deceiving consumers, while a high number of small seizures (under 6 litres/seizure) were done for fiscal reasons.

In terms of counterfeiting 6.49 percent by number of reports and 0.13 percent by quantity were reported as counterfeit.

In total 429 arrests and 423 searches were reported in relation to illicit alcohol, while the law enforcement activities disrupted 34 organized crime groups (OCGs) in connection with this commodity, of which 15 OCGs were directly involved in the production or distribution of counterfeit alcoholic beverages. Twelve persons were prosecuted<sup>7</sup> and 433 persons identified as suspects for involvement in illicit deeds regarding alcoholic beverages.

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<sup>6</sup> By looking at how frequent a type of product was amongst the seizures, based on the number of reports mentioning it.

<sup>7</sup> From this point onwards, when mentioning the number of prosecuted persons, it should be noted that the data refers at the moment of reporting, while in the meanwhile other persons might have been prosecuted.

A regional constant trend that confirms observations done in previous years relates to a high number of small seizures of illicit alcohol in Hungary, originating in Ukraine, Moldova, Romania, Bulgaria, Serbia, Montenegro with an average of about 15 litres/seizure. Of note is that besides citizens of the aforementioned countries (probably transiting Hungary), also citizens of Austria, Slovenia, Czech Republic, Poland, Croatia, United Kingdom, Sweden and Portugal were connected with this trend, suggesting a flow of illicit alcohol from Eastern to Western Europe.

During OPSON VIII, by far, the highest seizures of alcoholic beverages took place in Italy, where the authorities discovered more than 31 million litres of illicit wine products. Fifty six search warrants were executed in these cases and two criminal groups dealing with illicit alcohol were disrupted. The reported reason for seizure was deceiving consumers regarding the origin of the products.

In one case in Italy, more than 2,000 litres of wine were seized at a winery cellar because fragments of glass were found in the final product, most probably due to a faulty bottling process.

Besides these seizures in Italy, important quantities of alcohol were confiscated in Hungary, where in four cases a total of about two million litres of wine were seized for food safety reasons.

In Indonesia after the investigations in Jakarta area, the authorities seized more than 333,000 litres of alcohol production. One person was arrested and one OCG disrupted and the illicit facility producing the beverages was closed down.

#### **Cereals, grains and derived products**

Compared to last year the general trend regarding the threat posed by this commodity shows an increase in the quantities of harmful products seized, although the types of products seized are fairly similar.

Being the second most seized commodity during OPSON VIII, this category was reported in 107 cases, by 12 countries (Europe, Africa South America and Middle East) and totaled about 3,600 tons of products evaluated at around USD 2.5 million.

In this category, the biggest quantities seized were wheat (more than 2,400 tons), but also lentils, chickpeas, flax seed and rice (about 1.1 tons altogether), majority of the seizures being reported by Italy.

Regarding the infringements observed, the majority of seizures (74 percent by quantity and 69 percent by number of reports) were done for food safety reasons. This means that both based on quantity and number of cases, most of the seized goods presented a risk for human health, being expired, badly stored, lacking sanitary certificates, or being generally unfit for human consumption. In few cases smaller quantities of flour, rice, pasta and bread (worth about USD 200,000 in total) were seized for fiscal infringements.

Counterfeit products were reported under 0.5 percent of the total quantity, however this might be also because the majority of products seized were not necessarily branded.

Nine persons were arrested, three searches conducted and two OCGs were targeted with disruption measures while 21 companies were reported in connection with illegal deeds involving cereals and derived products. In addition, five persons were prosecuted and other six suspects were identified in connection with illegal actions involving this commodity.

Of the two OCGs, reported by Burundi one was producing corn flour in an unauthorized location, of which 163 kg were seized for being rotten, and the other was involved in food fraud related also to corn flour.

#### **Condiments**

Although the total number of illicit condiment seizures was less in OPSON VIII than OPSON VII, the total quantity and value of condiments seized by authorities in OPSON VIII was higher than during OPSON VII. Based on the data reported, we assess that this category of products remains a threat for public health, especially in terms of food



safety and the fact that eight OCGs were involved in illicit deeds points out that this commodity is susceptible to counterfeiting and smuggling.

Illicit products in this category were reported in 52 cases, by nine countries (from Africa, Europe and the Middle East), making condiments the third most seized category of products, totaling more than 1,100 tons of harmful products seized, estimated at around USD 17.9 million.

The biggest seizures in this category relate to balsamic vinegar, pesto sauce and raw seasoning amounting to about 1,000 tons of illicit products.

Food safety and deceiving consumers were the most reported infringements by number of reports (66 percent), whereas by quantity more than 84 percent of products were seized for food safety reasons. This means that a small number of cases accounted for the highest quantities of products seized (more than 900 tons) and these products were particularly harmful for human health. Additionally in higher number of cases, but much smaller quantities the products were found to deceive the consumers regarding the origin or content of the goods.

In one percent (by quantity) and about nine percent (by number of reports) the goods seized were reported as counterfeit.

In total, 15 persons were arrested, 43 search warrants executed and eight OCGs disrupted in relation to illicit condiments, while one person was prosecuted and ten others identified as suspects for involvement in illicit deeds regarding this commodity.

Worth mentioning seizures were reported by Indonesia, who took out from the consumption market about a ton of packed refined salt due to microbiological contamination, Spain who seized 87 kg of substandard saffron evaluated at almost USD 700,000, South Africa who reported seizures of more than 12 tons of Chinese branded raw seasoning and Italy, who seized balsamic vinegar worth more than USD 16 million.

### **Sugar and sweets**

Compared to last year the number of cases reported for this commodity dropped significantly, although the number of reporting countries increased. Nevertheless, the value of the seized goods reported this year is much higher than in OPSON VII. Sugar and sweets remain a high risk especially in terms of counterfeiting and it is expected that this commodity will continue to be targeted by criminals in the future.

Illicit products in this category were reported in 131 cases, by 18 countries (Africa, Europe, Middle East and South America) and totaled about 680 tons. The estimated value of the goods seized is around USD 5 million.

In this category most of the products seized were toy candies, jelly figures/jelly beans and chewing gum.

An interesting observation is that by quantity, more than 78 percent of the products seized were counterfeit, while by number of reports accounting for about 10 percent of the seizures. Food safety was the second most present infringement reported in 21 percent by quantity and in 53 percent by number of cases. This means that a few cases accounted for the biggest quantities of products seized as counterfeit, while the rest of the seizures were in higher numbers however in smaller quantity per seizure.

It is worth mentioning that the percentage of counterfeit products in this category was the highest reported in OPSON VIII, making (branded) sweet products highly susceptible for counterfeiting.

In total, six persons were arrested, five searches conducted and four OCGs were disrupted in relation to this commodity. Additionally, 16 persons were prosecuted and other 15 suspects were identified in relation to illicit actions regarding this type of products.

The biggest seizures in this category were jelly candies reported by Bulgaria (576,000 pieces) and toy candies reported by Lithuania (335,000 pieces and additional 131 tons).

### **Chicken and duck eggs**

This year seven countries reported 18 seizures of more than 600 tons of eggs (about 1.2 million pieces), which were done in most of the cases for food safety infringements. Thirteen searches have been carried out in connection with this commodity and one OCG was involved in acquiring and selling eggs labeled with fake information.

The above-mentioned seizures are important as sometimes this commodity tends to be overlooked, however the health risks associated with it (food poisoning, salmonella outbreaks, etc.) should be looked at carefully, as the impact for public health can have serious consequences, especially for children and persons with a weak immune system<sup>8</sup>.

### **Meat and meat products**

Taking into account the seizures in OPSON VIII but also the data obtained in previous editions of OPSON, we assess that the threat for public health remains high regarding this category of products.

Eighteen countries (from the Middle East, South America, Europe and Africa) reported 256 seizures of illicit meat and meat products, amounting to more than 400 tons. The estimated value of the goods is around USD 860,000.

This category was one of the most reported in association with hazards for human health, such as unfit for human consumption, causing gastro-intestinal track disturbance, lacking traceability, improper storage conditions, likely to cause illness, undeclared additives (E620-glutamic acid) and phosphates, lack of sanitary certificate, risk of encephalopathies, just to name a few.

Both by quantity seized (92.3 percent) and by number of reports (89.3 percent) food safety infringements were the main reason for seizure of these products. This means that food safety was the main reason for seizure both from a quantitative and frequency point of view, which makes this type of illicit goods a serious threat for public health.

In addition, counterfeiting was mentioned in 3.52 percent of the cases and for 4.48 percent of the quantity.

Thirteen persons were arrested, 33 prosecuted and 12 suspects were identified in relation with illicit activities involving meat and other meat products. Although this year no OCG was reported in connection with this type of products, based on observations made during the last two years, it is probable that organized crime groups do target this type of commodity, especially if it is associated with a recognizable brand.

Amongst the seizures worth mentioning, Bulgaria seized more than fifteen tons of meat microbiologically contaminated, Czech Republic seized more than three tons of specific kebab mix which containing high levels of undeclared additives E 621 (monosodium glutamate) and E620 (glutamic acid), while 160 kg of beef kebab were found to contain pork meat. In another case, 193 kg of beef and pork sausages were found to contain chicken DNA.

### **Fruits, vegetables and legumes**

Although it remains a threat for public health, this year the trend seems to be decreasing as the number of reporting countries, the quantities seized and the value of products reported dropped compared to the 2018 edition of OPSON.

Seizures of illicit products in this category were reported by 15 countries (Africa, Europe, Middle East and the Americas) in 147 cases. The whole quantity seized is around 270 tons and the goods are worth about USD 314,911.

In this category more than a third of the whole quantity were apples, however muskmelon (cantaloupe) was also present in higher quantities than other products.

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<sup>8</sup> <https://www.fda.gov/food/buy-store-serve-safe-food/what-you-need-know-about-egg-safety>

Regarding infringements in connection with this category, food safety was the most reported (72 percent by quantity and about 58 percent by number of reports). Two persons were arrested because of their involvement in smuggling activities, eight prosecuted and another 27 identified as suspects involved in illicit activities.

Notable seizures were reported by Belarus, about 72 tons of apples in total, Portugal 34 tons of muskmelon and 24 tons of goji berries and Romania, about 20 tons of mixed vegetables.

### **Cooking oil (all types)**

All in all, the threat regarding this commodity (particularly regarding extra virgin olive oil) remains at high levels, especially in Europe, on one side, because of the involvement of organized economic crime in illegal production of kind of goods and on the other probably because of the high price and market demand for this commodity.

Reported by eight countries, in 53 cases, seizures of cooking oil, comprising all types of oil used for preparing food and amounted to about 164 tons of illicit products with an estimated value of around USD 8.1 million.

By far, in this category the most seized product was extra virgin olive oil, all reported cases coming from Italy and Greece.

By number of reports 53 percent of the seizures (but 9 percent by quantity) were done because of food safety, however by quantity in 72 percent of the seizures (but 5.7 percent by number of reports), the countries mentioned counterfeiting activities, all of them related to olive oil. This means that only a few seizures accounted for the whole quantity of illicit products reported as counterfeit, while smaller quantities but in bigger numbers of seizures were confiscated for other reasons (food safety, mixed or fiscal infringements).

In relation to this commodity, 26 arrests, 20 search warrants were carried out while two OCGs were reported as disrupted by law enforcement measures. Additionally, two persons were prosecuted and twelve suspects identified.

In Italy, who carried out activities specifically targeting olive oil<sup>9</sup>, the authorities raided several premises and confiscated, amongst others, more than 110,000 litres of olive oil, two labeling machines, 2 electric pumps, two filling and two capping machines and more than 18,000 cans, used for packing the olive oil. The OCG which was manning this illicit process was importing seed oil from Tukey and by using chlorophyll and beta-carotene was coloring the oil which was distributed in Italy and Germany as extra virgin olive oil. We remind that during OPSON VII (2018), Greece reported disrupting an OCG which used a similar MO.

In Indonesia the authorities in West Papua seized about 1.5 tons of illicitly produced (and harmful for human health) cooking oil, with an estimated market value of about one million USD.

Although this year both the number of reports and the reporting countries are less than last year, the quantities are roughly comparable, however the estimated value of the goods seized is much higher this year. This is probably due to the fact that complex production machinery and storage devices were seized along with the illicit olive oil products.

### **Seafood**

Compared to last year, this commodity was reported during OPSON VIII by a lower number of countries and both the quantities seized and the estimated value are lower this year. Strictly compared to OPSON VII (2018) the risk associated with this commodity is probably decreasing, however it still remains a concern from a food safety perspective.

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<sup>9</sup> Targeted activities carried out by the Italian authorities in the framework of the Operation "Oro Giallo" carried out at national level.

Seafood products were reported by 12 countries (Africa, Europe, Middle East and North America), in 99 cases, the total quantity raising to about 149 tons of illicit products seized, with an estimated value of around USD 380,000.

Most of the quantities seized were unspecified fish, but bivalve mollusks and shrimps were also seized in higher amounts than others.

For this category most of the infringements were related to food safety, (85 percent by quantity and 69 percent by number of reports), while deceiving consumers was also mentioned (in less than 2 percent of the quantity and about 20 percent of the reports). This indicates that seizures regarding seafood were done in the vast majority, for food safety reasons.

Thirty-two persons were prosecuted, 29 suspects identified and two searches were related to illicit actions regarding this type of products.

The biggest seizures were reported by Portugal, amongst others more than 73 tons of fish, two tons of bivalve mollusks, over 67,000 cans of seafood. USA reported over 33,000 pieces of eel, Italy 4,500 pieces of sea urchins<sup>10</sup>, Greece 2.5 tons of sea cucumber (Holothuroidea), Lithuania 1.8 tons of expired canned shrimp, while France reported, amongst others, 1.6 tons of oysters.

In Indonesia, the authorities have seized about 20 tons of toxic seafood, because the products contained hazardous levels of formaldehyde, added as a preservative.

#### **Dairy products**

Seizures of illicit dairy products generally decreased compared to last year, both by number of cases and quantity, however counterfeit baby formula still remains a high threat for a particular type of consumers.

During OPSON VIII 18 countries (from Africa, Europe, Middle East, North and South America) reported illicit products in this category in 99 cases. The total seizures raised to more than 62 tons and the goods are evaluated at around USD 403,000.

The most seized product in this category was cheese, but smaller quantities of yogurt and milk were also confiscated.

The majority of infringements observed with regard to dairy products relate to food safety (45 percent by quantity and 64 percent by number of reports). In most of the other cases the products were seized for deceiving consumers while in more than a quarter of the seizures no infringement was mentioned.

Counterfeited products were found to be at 10.7 percent of the quantity, representing 2.11 percent of the reported cases.

Seven persons were arrested, two search warrants carried out and two OGGs disrupted by the law enforcement measures, while additional eight persons were prosecuted and another six were identified as suspects involved in illicit actions relating to dairy products.

The majority of the products sized were reported by Italy (mostly cheese), however notable seizures took place also in Jordan about 17,000 pieces of rotten dairy products and Belarus, more than four tons of hazardous products. In the Czech Republic, in one seizure, the authorities seized almost 14,000 cans of counterfeit baby milk powder and USA also reported several seizures of baby formula, of which in one case 287 pallets of baby formula were taken out of the market for food safety reasons.

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<sup>10</sup> A marine echinoderm having a spherical or flattened shell covered in mobile spines, with a mouth on the underside and calcareous jaws, according to Oxford Dictionary of English.



### **Food supplements/additives**

Considering the findings of OPSON VIII but also observations from other INTERPOL operations (PANGEA, HEERA or JUPITER series) food supplements in particular (sometimes referred at as health supplements) remain a target for counterfeiters especially if the product is associated with a brand. Compared to last year, the number of cases decreased, however the number of reporting countries, the quantity and the value of products seized increased making illicit products in this category an increasing threat for public health.

Reported by ten countries, in 49 cases, seizures related to this commodity amounted to almost 50 tons of illicit products. The estimated value is more than USD 172,000.

Most of the products seized in this category were general dietary supplements, erectile dysfunction supplements or nutrition supplements for athletes.

By quantity, 80 percent of the products were seized for reasons related to food safety, while by number of reports only 22 percent were seized for this reasons. In addition, deceiving consumers was mentioned in about 30 percent of the cases (by number of reports) and 5 percent (by quantity).

About eight percent of the quantity and six percent of the cases relate to counterfeit products.

Ten arrests and eleven searches were conducted, three persons were prosecuted and two other persons were identified as suspects in relation to this category of products.

Notable seizures in this category were reported by Italy who seized 3.9 tons of food additives, Greece 1.2 tons of unspecified food supplements, Jordan 1,030 pieces of nutrition supplements for athletes and USA 1,000 pieces of dietary supplements .

On the topic of DNP, most of the information reported indicates that this type of products tend to be sold online rather than in "brick and mortar" stores. In this regard, UK has reported 38 websites illegally selling this type of goods and the actions taken during the operation involved shutting down the website or suspending the listing of the product from a marketplace. In Addition, Finland reported seizures of a package with 195 tablets containing DNP, which were allegedly coming from the UK.

### **Coffee/Tea**

Compared to last year and considering the number of cases, quantity and estimated value of the seizures this commodity shows a decrease, although reported by more countries this year than during OPSON VII (six countries last year, but bigger seizures).

Coffee and tea products were reported by 11 countries (from Africa, Europe, Middle East), in 30 cases and the seizures amounted some 50 tons of illicit goods taken out of the consumption market (35 tons coffee, 15 tons tea). The overall estimated value of the products seized is approximately USD 71,000.

By quantity of product seized the infringements observed in relation with this category were 29 percent related to counterfeiting, 19 percent food safety and 11 percent fiscal infringements. A high number of unspecified infringements (about 40 percent) were also observed and this has the potential to impact the final conclusion on the reason for seizure in this case.

By number of reports on the other hand, most of the seizures were done for food safety reasons (40 percent) while in 36 percent of the cases the infringement remained unspecified. Counterfeit products are reported in about three percent of the cases. This indicates that in a higher number of cases small quantities of coffee and tea were seized for food safety reasons or fiscal infringements, while counterfeit products were found in much lower number of cases but in significantly higher quantities.

Five arrests were reported in connection with this category of products, one person was prosecuted and three suspects of involvement in illicit deeds relating to this type of products were identified.

In this category, notable seizures were reported by Jordan (19,000 packs of coffee), North Macedonia (14.7 tons of black tea), Italy (9.6 tons of green coffee) or Bulgaria (5.2 tons of coffee).

### **Nonalcoholic beverages**

Compared to last year, in terms of number of cases, quantity and estimated value, this commodity shows a decrease, although illicit products were reported by more countries in OPSON VIII than OPSON VII<sup>11</sup>. However, the reports regarding OCGs' involvement in the illicit production and distribution of nonalcoholic beverages in Africa point out that this commodity is still a threat for public health, at least at regional level.

Illicit products from this category were reported by 13 countries (Africa, Europe, South America), in 104 cases, totaling about 40 tons, with an estimated value of around USD 290,000.

Most seized type of goods in this category were energy drinks, amounting to about 33 tons.

Considering the types of infringements reported, by quantity food safety was reported in 47 percent, while by number of reports in 66 percent of the cases. This means that nonalcoholic beverages both by quantities and the rate of recurrence amongst the seizures posed a threat rather from a food safety perspective than others.

An interesting observation is that counterfeit products were reported in 48 percent of the cases by quantity and 6 percent by number of reports, pointing out that counterfeit products were seized in bigger amounts, but in a small number of seizures.

In relation with this category of products the countries reported 23 arrests, 15 searches and the disruption of 13 OCGs, all of these OCGs being reported by African countries. Three persons were prosecuted and other 14 were identified as suspects for involvement in illegal actions connected with this commodity.

Amongst the biggest seizures, the Republic of North Macedonia (19,000 litres) and Zimbabwe (more than 13,000 litres) reported energy drinks, while Albania reported 1,450 litres of mineral water.

### **Mixed products seized**

Compared to last year the number of reporting countries and of seizures are lower for this category, however the reported value of the goods seized is about ten times higher. Also the quantity reported is about one third higher this year than in OPSON VII. This category of illicit products might be an indicator of the complexity of illicit activities but in the same time might be a result of insufficient individualization of the goods seized while reporting, therefore the difficulty of assessing the impact on the criminal market.

This category of products<sup>12</sup> was reported by 19 (Africa, Europe, Middle East, Americas) countries, in 163 cases, totaling about 1,302 tons. The estimated value raises at around USD 12.8 million.

Notable seizures were reported for example by Russia (707,400 items of mixed foodstuff), Hungary (31 tons of noncompliant foodstuff), Jordan (27,000 pieces of food items unsuitable for human consumption), Italy (10 tons of dried pasta and legumes) or Rwanda (smuggled goods).

Most of the infringements reported relate to food safety (55 percent by number of reports, but 7 percent by quantity). Unfortunately by quantity, more than 90 percent of infringements remained unspecified. Counterfeiting was reported in about 5 percent of the seizures (by number of reports).

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<sup>11</sup> Eleven countries last year, but bigger overall quantity seized.

<sup>12</sup> It includes the food products reported as mixed but also the ones labelled as "others", which could not be individualized or dissociated, therefore they will be referred to as mixed products seized.

Twenty-five persons were arrested, five searches carried out and five OCGs were disrupted by the law enforcement measures taken in these cases. In addition, 29 persons were prosecuted and 41 persons identified as suspects related to mixed food items.

### **Livestock**

Of note is that this year, in comparison to last year, is that the numbers are considerably higher regarding the seized live stock.

Reported by three countries, in 8 cases, about 65,940 livestock prepared for selling were seized. The estimated value is more than USD 220,000. The vast majority of the livestock were cattle and horses, but there were also pigs, sheep and unspecified livestock. In this category, cattle, horses and sheep were abusively submitted to therapeutic treatments which resulted in the contamination of the meat with harmful levels of pharmaceutical residues.

### **Organic products**

At the initiative of the European Commission and with the support of Europol and Interpol, the authorities in the European Union (EU) have scrutinized more than 90,000 tons of products certified as organic which were imported into the EU from various parts of the world<sup>13</sup>. Amongst the commodities included were mostly agricultural products (strawberries, olives, olive oil, wheat, soy beans, apples, etc.) and in many cases the goods were actually cleared by the customs authorities not as organic but as conventional goods.

Amongst other examples the following cases are indicative in regard to the extent of the problem: Spanish authorities, checked a consignment of 180 tons of alleged organic olive oil coming from Tunisia, which was actually cleared as "not organic lampante oil", Slovenian authorities checked one ton of declared organic apricots coming from Turkey, which turned out to contain pesticides over the accepted limit, UK authorities checked more than 2,400 tons of declared organic corn coming from Turkey, under the suspicion of not being organic.

In addition, Netherlands authorities checked more than 20 tons of alleged goji berries coming from China, and more than 22 tons of alleged organic avocados from Mexico, under the suspicion of being falsely declared as organic. Germany has checked more than 40 tons of organic strawberries coming from Turkey, three tons of apples from Moldova and about 13 tons of dried lemon peel from South Africa, in all cases the products being declared as organic, while the authorities had strong suspicions that the goods were actually falsely declared. Furthermore, important quantities cereals declared as organic milling wheat and soft wheat (more than 12,000 tons) originating in Kazakhstan and imported to Sweden and UK raised strong suspicions regarding their alleged organic origin.

### **Online sales**

The information reported about online sales remains fairly low in comparison with the data indicating illicit sales of food stuff offline. In this regard, Italy has reported the seizure of three web domains that were selling DNP containing products and Indonesia identified several websites and social media pages that were advertising food products, especially food supplements and other processed foods and alcoholic beverages. In UK, the authorities identified 53 cases when DNP was listed for sale as a food supplement on social networks, online marketplaces or individual websites.

### **Side Seizures**

This category of seizures contains illicit products which were not specifically targeted by OPSON VIII, but were encountered during the checks and seized. Compared to last year, both the number of countries reporting side seizures and number of reports are lower this year, however, the quantity and estimated value of the seizures are higher.

Illicit goods in this category were reported by 13 countries (from Africa, Europe, Middle East, North America), in 216 cases and totaled more than 692 tons of products, with an estimated value of about USD 16,000,000.

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<sup>13</sup> South America, Eastern Europe, Euro-Asia.

The goods included goods such as machinery and equipment for illicit production, packaging, solar batteries, toner cartridges, gas cylinders, medicines, cosmetics, car and motorcycle spare parts, footwear, clothing, handbags, wristwatches, belts, wallets or sunglasses.

By far cosmetics were the most frequent amongst the side seizures, being reported in 121 cases, while medicines appeared in 37 cases.

One of the most interesting seizures was reported by Kenya who disrupted an OCG dealing with counterfeit US currency. In this context Kenyan authorities seized more than 13 million USD fake currency.

In Russia, Police authorities of the Tatarstan Republic disrupted an OCG that was counterfeiting and distributing printer cartridges infringing the intellectual property rights of "Xerox", "HP", "Canon", "Samsung", "Brother" and "OKI" and deceiving the consumers in buying fakes, under the guise of original products.

Regarding this category, in total 12 persons were reported as arrested, 17 searches carried out and 15 OCGs were disrupted. Furthermore another 19 persons were identified as suspects in relation to various illicit commodities encountered during OPSON VIII.

### 3.3 Where do the illicit products originate?

Generally, taking into account the overall quantity of the products seized, and counting national and international seizures together<sup>14</sup>, Italy was the main origin and in the same time destination country, but this is due to the substantial seizures of illicit local alcohol reported, which are the highest since the Opson initiative started in 2008. Please see figures 1 and 2 below for details.

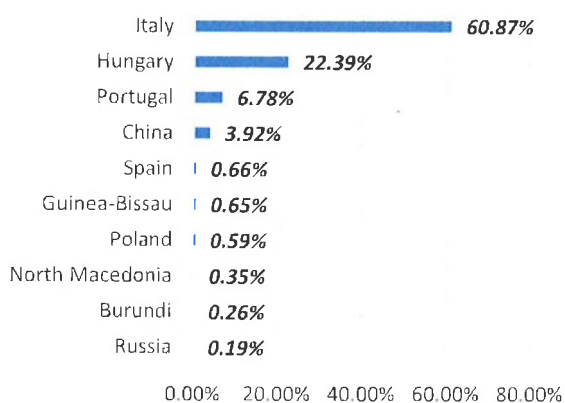


Fig. 1 General origin countries, by quantity of products seized (First 10)

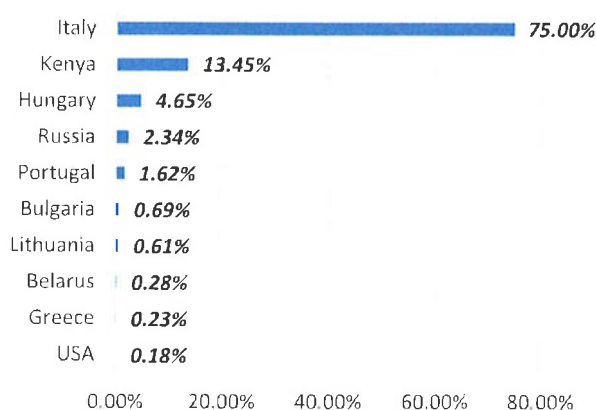


Fig. 2 General destination countries, by number of reports of products seized (First 10)

Internationally however, the operational results suggest that China remains the main origin country for illicit food products seized in OPSON VIII, South Africa and Botswana (in Africa) and Peru and Colombia (in South America) are probably important entry/transit points for illicit goods coming from outside these continents, though the largest volumes of illegal foodstuff seem to be produced and sold rather locally.

<sup>14</sup> Data regarding the origin and destination was reported in 1519 cases only.



However, when looking at the data from an international perspective<sup>15</sup>, i.e. excluding national seizures<sup>16</sup>, the picture changes a bit and a more complex situation can be observed. In this regard, by quantity China remains the main origin country, with a variety of more than fifteen categories of the illicit products seized originating here. Guinea-Bissau was reported as source country for significant quantities of illicit vegetables and legumes, while products originated in Poland (meat and sweets) were seized also in noteworthy quantities (details in figure 3 below).

By number of reports though South Africa was mentioned in 202 cases by Botswana and Eswatini (referring to 14 different categories of illicit products), while Romania was reported in 143 cases (by Hungary and referring to illicit alcoholic beverages, in smaller quantities), suggesting rather personal use for these illicit products. Regarding China the number of reports mentioning it as origin country are smaller, however the quantities involved per seizure are higher than from other countries (average of about 4.8 tons from 81 seizures). For details, please see figure 4 below.

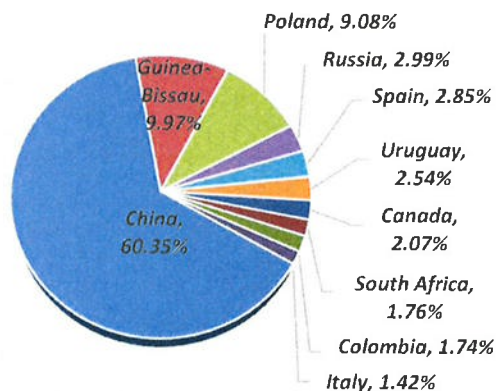


Fig. 3 International shipments - origin countries, by quantity of products seized (First 10)

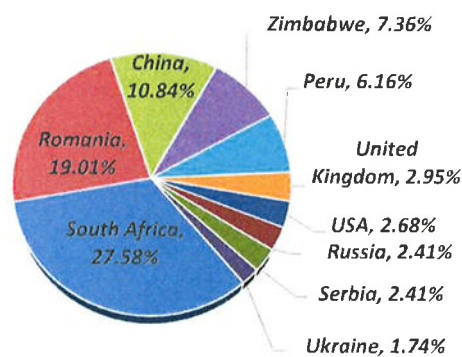


Fig. 4 International shipments - origin countries, by number of reports (First 10)

In terms of destination countries, by the criteria of quantity Bulgaria reported locally originating illicit foodstuff but also a significant seizures of jelly candy (576,000 pieces, from China), which are amongst the biggest quantities of goods seized and sourced outside the reporting country. Portugal was destination for noteworthy quantities of illicit fruits and vegetables coming from Guinea-Bissau, Uruguay and China (more than 124 tons), while in Italy about 80 tons of potentially harmful foodstuff (supplements, seafood, eggs) sourced outside the country, were reported<sup>17</sup> (Details in figure 5 below).

By number of reports though, Botswana was a destination country for many products originating in South Africa and China, while Hungary was a destination/transit area for goods coming from the Balkans and Eastern Europe. In addition, South Africa was a destination for illicit products from several other countries, but in rather small quantities. (Details in figure 6 below).

<sup>15</sup> Data regarding the origin and destination of international shipments reported in 747 cases only.

<sup>16</sup> i.e. seizures where the origin country was the reporting country itself.

<sup>17</sup> Regarding Italy, as it is the case for other reporting countries as well, the origin of the goods was not mentioned in all cases, therefore there is a possibility that the number of internationally sourced products is actually higher than the one presented in this report.

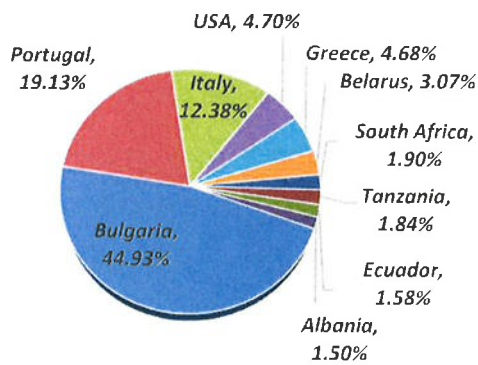


Fig. 5 International shipments - destination countries, by quantity of products seized (First 10)

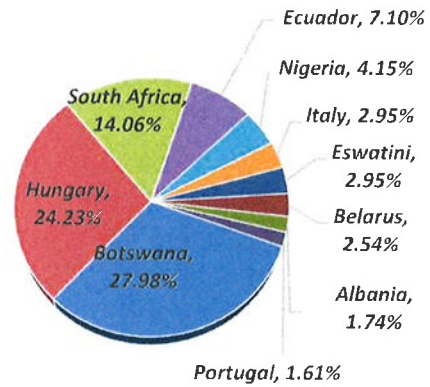


Fig. 6 International shipments - destination countries, by number of reports (First 10)

### Hot routes

Looking to detect already established illicit routes between countries and considering as indicator for this the unique connections between a source country and one or more destination countries, China was mentioned as source by other twelve countries while United Kingdom and India were indicated by other six and five countries respectively, as origin of illicit food and drinks (figure 7 below).

In terms of destination countries, illicit goods were sent towards South Africa, Italy and Hungary from a higher number of countries, making them the main destination countries during Opson VIII. Please see details in Figure 8 below, which shows the amount of direct connections between origin and destination countries.



Fig. 7 Origin countries "exporting" illicit products to a number of destination countries (First 10)



Fig. 8 Destination countries "importing" illicit products from a number of origin countries (First 10)

Particularity during OPSON VIII, but possibly with a complexity extending beyond the scope of the operation, several transport itineraries showed a higher concentration of categories seized. In this regard, the highest number of different categories of illicit products were reported going from South Africa to Botswana (15), China to Botswana (6), Colombia to Ecuador, Peru to Ecuador and China to Italy (4 in all cases). This potentially indicates that on these routes there are already established criminal links that need increased attention from the LEAs inside the national territories but especially at the border.

### 3.4 How are the offences/infringements committed?

Based on the information reported, most of the cases seem to involve complex illicit activities related to production, adulteration, packaging, transport, storage, inserting in legal circuits and selling potentially harmful food products or merchandises designed specifically to deceive the general public into spending more money for poor quality foodstuff. Also smuggling and financial crimes play an important food related crimes.

In some other cases poor storage, transport or selling conditions affected the safety of the foods and drinks, these cases being connected more with administrative infringements, rather than criminal actions.

On average, by combining the number of reports and quantities of illicit products reported, deceiving consumers (about 38 percent) and food safety (about 30 percent) were the overall main reasons for which the goods were seized during OPSON VIII. (For details please see the figure 9 below).

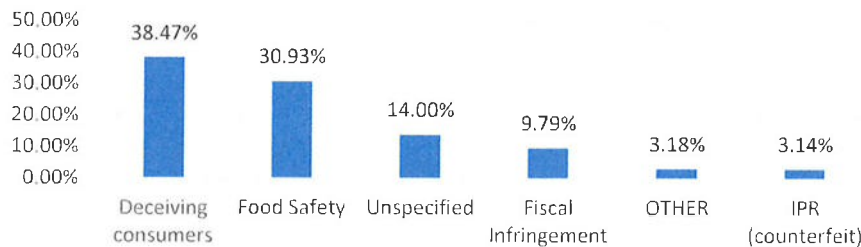


Fig. 9 Overall average of infringements reported

By quantity alone, more than 70 percent of the goods were seized for reasons related to deceiving the consumers regarding the quality, origin or other features of the products, while by number of reports, in more than 41 percent of the cases the goods were seized for food safety reasons. This potentially means that larger quantities of food and drinks were not what they were stated to be on the labels or in accompanying documents, and that in many other cases the products posed (immediate) threat to the public health. In the figure 10 below, please observe the types of infringements reported, both from a quantitative point of view and by their frequency amongst the seizures (number of reports).

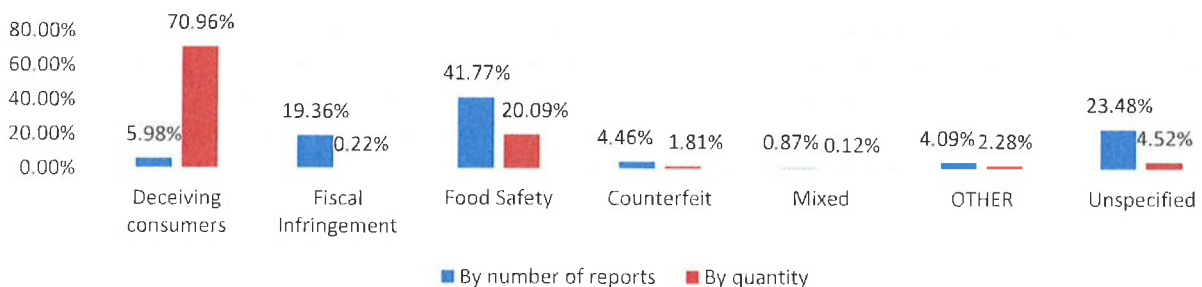


Fig. 10 Type of infringements reported

The reports show that counterfeit products remain at an average of roughly three percent, however the measurement process for this type of infringements can be improved in order to allow a more accurate understanding of the factors involved and to propose better counter-acting strategies. Please see the recommendation section below, for proposals on how to improve the reporting.

In addition, versions of food fraud activities were reported, involving adulteration and counterfeiting, while amongst the reasons for seizure worth mentioning are: smuggling, lack of excise stamps (alcohol), lack of traceability, expired products, food unfit for human consumption, products coming from

unregistered/unapproved/ clandestine production facilities, illegal use of trademarks/protected indications of origin, high content of pollutants, storage in improper conditions, to name only a few.

### 3.4.1 Possible new modus operandi detected - fraud by misrepresentation

The data submitted during OPSON VIII (more than 50 cases) point to a potential new modus operandi (MO) in relation to food fraud involving products certified and labeled as organic (mostly agricultural goods and derived products), possibly fueled by the fact that the prices are considerably higher for goods which are certified as organic.

The MO consists of obtaining (fraudulently) certificates of organic production for goods which in fact are not organic, then submitting these documents to the border authorities with the intention of custom clearing the goods as organic. *Post-hoc* analysis of many of the “organic certified” food products showed that the level of pesticides were much higher than the ones accepted for organic production, therefore proving that the goods are not organic but rather coming from conventional agriculture.

### 3.5 Who is involved in this?

Compared to 2018 the total number of arrests in 2019 is higher and the reports of OCGs involved in food crime has increased from 66 last year to 79 in 2019, which potentially shows that either food crime becomes more attractive for criminals or the LEAs are better tackling the criminal aspect of food fraud. Please see in the chart below (figure 11) the main food products targeted by organized crime during OPSON VIII.

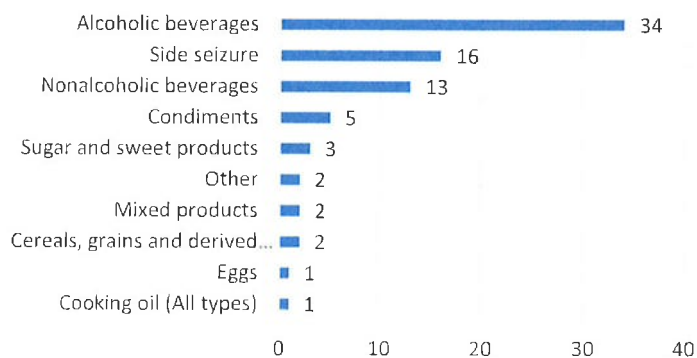


Fig. 11 Number of OCGs by category of food products

Similar to the last two years alcoholic beverages were the most targeted products by organized crime and the number of OCGs disrupted, illicit production facilities closed down and pieces of equipment used for illicit production seized, increased significantly, suggesting that the illicit production of alcohol might be on the rise, at least in Eurasia if not globally.

Another relevant aspect is the connection of OCGs to non-alcoholic beverages. In this regard, all the reports for this category of products came from Africa (Burundi, Uganda and Zimbabwe), where the infringements indicated were related to IPR and food safety, pointing out at least to a national if not regional problem regarding illicit non-alcoholic beverages.

By far, the biggest numbers of arrests (2,578) and criminal cases (1,820) during OPSON VIII were reported by the Chinese authorities.

At least 399 companies have been reported in connection with criminal activity worldwide, of which 12 companies have been linked with organized crime activity (all of them in Africa).



### 3.6 Case examples

The following cases were reported by the participating countries during OPSON VIII, illustrate the illicit modus operandi used and also underline the efforts of the participating law enforcement agencies in the fight against food fraud. The examples are presented by region and alphabetical order.

#### Africa

##### **Burundi – substandard banana beer**

The authorities in Burundi seized, in Makamba region, about 14,250 litres of substandard banana beer which was sold illegally. In this case one search warrant and one arrest warrant were issued targeting and organized crime group dealing with illicit goods. One of the members of the OCG is wanted by the police.

#### **South Africa**

##### **Counterfeit alcohol**

Two Chinese and one Mozambican arrested after dismantling a network of counterfeiting and distribution of alcohol. The silver caps on the alcohol bottles marking the products for export were replaced with counterfeit ones (red and white) in order to hide the origin and intended destination of the alcohol. After removing and replacing the caps in a local warehouse the products were distributed in South Africa to smaller Chinese liquor stores across the country. The actions of the perpetrators resulted in significant tax evasion and fraud.



Alcoholic equipment and production seized

##### **Counterfeit yeast**

The South African authorities in Hartswater region seized important quantities (thousands) of sachets containing counterfeit yeast. This was an illegal packaging and distribution operation of counterfeited yeast in the region involving packaging materials and equipment. Two Chinese citizen were detained of which one arrested.



Persons detained, illicit equipment and production of counterfeit yeast

### **Financial fraud involving alcohol and fake labels**

Based on investigations, the South African authorities intercepted a consignment of counterfeit labels imported to South Africa and used for counterfeiting, which arrived through Oliver Thambo International Airport and reached a destination address in Carltonville. After raiding the destination premises the authorities found large quantities of counterfeit labels and alcohol (initially intended for export) being prepared for replacing export labels and being reinserted on the local market illegally. Six Chinese nationals were arrested and equipment, unused labels and alcohol seized.



Fake labels seized

### **Asia**

#### **Indonesia – fake marketing permit numbers**

In Indonesia, the food safety authorities dismantled a facility that was deliberately producing jelly-based processed foods, in an unlicensed factory in Sepatan Timur District (west of Jakarta), without respecting food safety standards. The perpetrators were using false marketing permit numbers that were deceiving the consumers about the origin of the products which was falsely stated to be Jakarta area. More than 300,000 pieces of illicit products were seized, estimated at around 6,000 USD.

### **Europe**

#### **Albania – tax evasion and food safety concerns regarding meat and wine**

In Albania, in Tirana region, police seized about 2.5 tons of beef, lamb and chicken meat, because of lack of veterinary certificates and tax evasion. Food safety irregularities were also found regarding the storage and processing of the food products, which were sold in a local supermarket.



Meat stored in improper conditions

In another case, the Albanian authorities in the Port of Durres seized 8,000 litres of wine, evaluated at around 20,000 USD. The goods originating in Italy were seized because of lack of customs declaration proof. Two arrest warrants were issued in this case.





Wine seized for lacking legal documents

## Belarus

### Fruits lacking sanitary certificates

In Belarus, the Vitebsk and Ezerishche local police stopped a truck towing a semitrailer, driven by a Belarusian national, close to the Russian border. Checks showed that the cargo of 18.5 metric tons of apple was accompanied by reportedly forged documents, i.e. the consignment note and the phytosanitary certificate. The merchandise evaluated at around USD 3,100 was seized. In another several cases, in Mogilev region, local police stopped eight trucks with Russian license plates driven by Russian nationals and detained a total of 41.6 metric tons of apples accompanied by forged consignment notes and phytosanitary certificates, valued at about USD 25,000.

## Italy – Operation Oro Giallo



Operation "Oro Giallo" is an Italian investigation on an OCG involved in an illegal commerce of counterfeit olive oil, conducted by NAS Carabinieri with the collaboration of the German Police, coordinated by the Public Prosecutor's Office of Foggia and supported by Europol and Eurojust. The case started in 2015 thanks to a citizen who detected the extremely poor quality of the "so called" extra virgin olive oil.

The provision arises from the results of a significant investigative activity, originating from an inspection carried out at a food retailer in the local market of Foggia, conducted by NAS Carabinieri, which allowed to reveal the existence of an OCG that managed the traffic of large quantities of sophisticated seed oil (soy or sunflower) by adding chlorophyll and beta-carotene. Therefore, the counterfeit product was similar to extra virgin olive oil and could have been commercialized, generating an unfair considerable gain. Moreover, on some products there were also falsely PGI labelled (Regulation (EU) No 608/2013).

The organization, availing itself of nominees to deflect possible investigative actions, purchased from a regular company in the sector of the province of Milan food additives, quintals of chlorophyll and beta-carotene, to be used for the sophistication of seed oil. Inside the oil mill, the activities of illegal mixing took place through the manual labour of workers, aware of the role and of the illicit methods. The other associates, obtaining the sophisticated oil,

carried out the sophistication and packaging activities (in one-litre glass bottles or 5-liter cans) in warehouses or makeshift warehouses, without any guarantee of hygiene, placed in strategic positions and difficult to access, in order to evade possible checks. They too used trusted workers, now experts in the sophistication of oil, with years of criminal experience behind them. The OCG was able to carry out fortnightly transports in Germany through loads of entire articulated lorries (23,000 litres for each shipment).

Europol IPC3 AP Copy supported the case with cross checks and analytical support. During the Action Day, two Europol officers were deployed in the area of Foggia, Italy, to provide on spot support. At the end, the operation had the following general results:

- 20 arrested individuals, belonging to the OCG;
- About 150,000 litres of counterfeit/illegal olive oil seized.

### Lithuania – Counterfeit candies found inspecting warehouses



United team of experts (from the State Food and Veterinary Service and Customs) during the operation OPSON VIII carried out unannounced official inspections at food grade warehouses in the main cities of Lithuania (Vilnius, Kaunas, Klaipėda). These inspections were mostly based on random selection, but some of the warehouses have been selected because of previous infringements detected and links to online selling of counterfeit goods. Lithuanian Customs has seized 335 881 pieces of candies suspected of infringing intellectual property rights that have been stored in customs warehouses and that might have been sold to any country inside and outside EU. The goods have been seized according to the Regulation (EU) No 608/2013 of the European Parliament and of the Council of 12 June 2013 concerning customs enforcement of intellectual property rights and repealing Council Regulation (EC) No 1383/2003. The positive collaboration with the right holders led to the destruction of the most of these counterfeit goods (administrative fines are going to be imposed). These fake sweet products have been made to attract the attention of one of the most sensitive and vulnerable group - children, most of them have been produced in a set with a toy.

134.099 KG of different categories of food (sugar and sweet products, fishery products) for human consumption from different countries of origin with expired date of minimum durability, which is related to the safety or quality of the product, have been detected by State Food and Veterinary Service in warehouses during these unplanned official inspections. The decisions on destruction of all these products have been taken. The administrative fines were imposed for FBOs and their activities have been suspended according to the Regulation (EU) No 852/2004 of the European Parliament and of the Council on the hygiene of foodstuffs.



## Portugal - Operation "OMELETTE"



The Economic and Food Safety Authority (ASAE) responsible for law enforcement and food safety initiated an investigation based on a complaint that an egg packing and grading centre did not meet the traceability requirements and classifying eggs with the PT code when they were eggs originating in a EU country. The suspicions have been confirmed.

As a result of this inspection the Spanish Authorities have determined that:

- The egg-packing centers identified have performed this activity without being duly registered in the official register. The eggs concerned were collected at the premises of the various producers and were delivered directly to the operator of Portugal, without having entered the centers at any time. There are no other possible lots involved in similar consignments and the final destination of the goods immobilized in Portugal is unknown, neither claimed by this company nor returned to its premises. Infringement proceedings have been initiated against his company, as a result of unauthorized activity and non-compliance with the rules on labelling and traceability.

In this center were seized, 513 408 eggs in the total value of 110,383 EUR.

## Spain – Operation Gurke



GUARDIA CIVIL-SEPRONA has conducted the Operation GURKE within organic food market. In this framework, it has been detected one company marketing a high amount of organic vegetables (cucumbers, peppers, etc.) significantly over the local organic capacity of production. Consequently, investigators carried out different police actions in order to prove that large proportion of the organic foodstuffs sold to the European market (mostly Germany, United Kingdom, France and Denmark) came from conventional production. As a result, three persons have been arrested for food fraud, apprehending 4.3 tons of non-organic cucumbers and identifying 472 tons of vegetables sold under the appearance of organic which came from conventional and in conversion production.

## **Russia – production and distribution of counterfeit alcohol**

Amongst other cases, Russian police in Khakassia region dismantled an underground facility used for producing and bottling alcohol-containing products and seized about 5,000 liters of alcohol, over 6,000 empty 0.5-liter bottles with labels affixed. The laboratory analysis of the alcohol also showed that the products were substandard lacking the legal physico-chemical parameters required and posing threat to public health.

## **South America**

### **Ecuador – agricultural products smuggling**

In one case the authorities in Ecuador seized six tons of onion representing potential threat to public health. The merchandise was transported by truck but was lacking phytosanitary certificates or documents stating the origin. The goods allegedly originating in Peru, entered the country illegally by eluding border controls.

## **3.7 Targeted actions**

### **Germany, BVL – targeted action on coffee**

During OPSON VIII, a Targeted Action was run across European countries in order to uncover possible fraudulent practices pertaining to coffee labelled as 100 % Arabica. Twelve countries actively participated in the operational phase; the other supported the initial planning phase of the action. The coffee action was coordinated by Germany (BVL) as action leader with the support of EU COM - DG Health and Food Safety and Europol. In total, nearly 400 coffee samples were analysed as part of the action. Concerning the irregularities, some cases were handed over from food surveillance to prosecution.

### **UK, FSA & FSS – Targeted action on dinitrophenol (DNP)**

One of the targeted actions co-ordinated with the support of Europol, and with participation of EU member states, targeted the sale for human consumption of the toxic chemical 2,4-dinitrophenol, also known as DNP.

DNP is a harmful and hazardous substance, with restrictions placed on its sale, transport and storage. It is not suitable for human consumption but has for many years been marketed as a substance which can be consumed as a 'fat burner' food supplement, to support weight loss or the efforts of members of communities such as body builders to maximise muscle tone.

Consumption of DNP can prove fatal, and data covering up to up to late 2019 suggests 30 known fatalities linked to DNP ingestion in the United Kingdom alone.

The targeted action aimed to increase awareness of the dangers of DNP, and to identify and take action around those found to be selling DNP for human consumption to European consumers.

Ten member states agreed to participate in the targeted action, which was led by competent authorities in the UK.

Total seizures, including loose powder and prepared capsules, are estimated to be roughly equivalent to 50,000 capsules of the chemical.

## **EU Commission DG Sante – targeted action on organic products**

With the leadership of EU Commission and the support of the Food Fraud Network, it has been performed a targeted action on organic food products and the growing trend of products falsely claiming to be organic in order to be sold at higher prices.

The action was run across 16 EU Member States to detect fraudulent practices pertaining to this field. The illicit practices uncovered include the use of unauthorized substances, the diversion of conventionally produced food to the organic market and the use of falsified documents to blur the traceability of the products.

## **4. CONCLUSIONS**

Based on the information reported, on the cross-reference and analysis of the data and taking into account the general OPSON framework, the following conclusions presented below, were developed:

OPSON VIII generally reached the objectives established and removed from the consumption market important quantities of potentially dangerous foods and beverages globally, in the same time bringing to justice the persons proved to be involved in crimes and disrupting organized crime dealing with illicit foods and beverages.

Illicit alcoholic beverages remain the main threat regarding public safety, showing greater complexity of illicit deeds and higher quantities involved while the quantity of alcohol seized during OPSON VIII is the biggest reported since the initiative started in 2008.

Sweets (especially associated with a brand), although reported in smaller number of cases continue to represent a target for counterfeiters, as for OPSON VIII seizures in this category were reported predominantly for IPR/counterfeiting reasons, a trend which is possible to continue in the following years.

The threat regarding counterfeit/adulterated extra virgin olive oil remains at high levels, both because of the involvement of OCGs in the illegal production and trade of this kind of goods and because the market demand and higher price for this commodity.

Based on the data reported to INTERPOL food/health supplements remain a target for counterfeiters especially if the product is associated with a brand and future OPSON editions should take into account a possible increase in the level of threat for public health, associated with this commodity.

Attention should be given to illicit non-alcoholic beverages as the reports regarding the involvement of OCGs in the illicit production and distribution of such products, especially in Africa, point out that this commodity might be an increasing threat for public health, at least at regional level.

The interconnection of criminals across continents (supply chains of raw materials, finished products, production equipment) seem to show more complexity, making Africa a possible emerging production area for illicit foodstuff but also other consumer goods, trend which is fueled especially by Asian threat actors.

## **5. ANNEXES**

**Annex 1:** Participating countries/agencies

**Annex 2:** Participation of the Private Sector

**Annex 3:** Categories of products

**Annex 4:** Acronyms and Abbreviations



### Annex 1: Participating countries/agencies

The following agencies/administrations of each country participated in OPSON VIII.

In total, this represented 67 countries.

<b>Countries</b>	<b>Administrations/LEAs</b>
<b>European Member States (Exchange of information via Europol)</b>	
Austria – AT	Federal Police; Customs; Food Administration Vienna
Belgium – BE	Customs; Federal Agency for the Safety of the Food Chain (FASFC)
Bulgaria – BG	Ministry of Interior: General Directorate of the National Police; Customs; Bulgarian Food Safety Agency
Croatia – HR	Customs
Cyprus – CY	Health Services; Police
Czech Republic – CZ	Police; Customs, State Veterinary Administration; Czech Agriculture and Food Inspection Authority
Denmark – DK	Veterinary and Food Administration
Finland - FI	Customs; Finish Food Safety Authority (EVIRA)
France – FR	Customs; Central Office for Coordinating Environment and Health Crime (OCLAESP – Police, Gendarmerie); Directorate for Competition; Consumption and Fraud Control (DGCCRF – Ministry of Finance); Food Directorate (Ministry of Agriculture)
Germany – DE	"Federal Office of Consumer Protection and Food Safety (BVL); Federal Criminal Police Office (BKA); Central Customs Authority (Zoll).  Food Control Authorities of the Federal States of Baden-Wuerttemberg, Bavaria, Berlin, Hesse, North Rhine Westphalia, Mecklenburg Western Pomerania and Schleswig-Holstein (as observer)
Greece – GR	Financial Police Division - Hellenic Police, Economic and Financial Crime (SDOE)
Hungary – HU	National Tax and Customs Authorities (NAV); International Law Enforcement Cooperation Centre (NEBEK)
Ireland – IE	Food Safety Authority of Ireland; Customs; Police (An Garda Síochána)

Italy – IT	Arma dei Carabinieri; Guardia di Finanza; Guardia Costiera; Customs (Agenzia delle Dogane)
Latvia – LV	Customs; Food and Veterinary services
Lithuania – LT	Customs; State Food and Veterinary Service
The Netherlands – NL	Dutch Food and Product Authority (NVWA)
Poland – PL	Police; National Food Safety Agency
Portugal – PT	Customs and Tax Authority; Food and Economic Safety Agency (ASAE)
Romania – RO	Police
Spain – ES	Guardia Civil (Unidades de policía judicial, Servicio de protección de la naturaleza, costas y fronteras, Unidades de seguridad ciudadana); Policía Nacional; DAVA (Customs Unit); Regional Food Safety Agencies (Consejerías de Sanidad y de Alimentación de las Comunidades Autónomas).
EU COM	DG Health
<b>Countries exchanging information via Europol (Operational agreements)</b>	
Iceland – IS	Customs; Icelandic Food and Veterinary Authority
Norway – NO	Customs; Norwegian Food Safety Authority
Switzerland – CH	Customs; Federal Food Safety and Veterinary Office (FSVO)
United Kingdom – UK	Food Standards Agency (FSA) – National Food Crime Unit; Food Standards Scotland – Food Crime and Incidents Unit; UK Port Health Authorities and Trading Standards Authorities (TSA); Police Forces in England and Wales, and Police Scotland; National Crime Agency (NCA); Border Force (UKBF); Scottish Local Authority Environmental Health; Scottish Public Analysts.
United States of America - USA	Food and Drug Administration (FDA)
<b>Countries exchanging of information via INTERPOL</b>	
Albania – AL	Police
Australia – AU	Department of Agriculture and Water Resources
Belarus – BY	Police; Customs

Burundi – BI	Police; Customs; Public Health; Bureau of Standards
CAMEROON - CM	UNSPECIFIED
China – CN	Police
Ecuador – EC	Police; Prosecution Office; Ministry of Public Health and Agriculture
Eritrea – ER	Police; Customs; Directorate of Public Prosecutions
ETHIOPIA - ET	UNSPECIFIED
GUINEA BISSAU - GW	UNSPECIFIED
India	Police
Indonesia – ID	Police; Customs; National Agency of Food and Drug Control (NAFDC)
Jordan – JO	Police; Customs; Jordan Food and Drug Administration
Kenya – KE	Police; Customs; Kenya Bureau of Standards; Anti-counterfeiting Agency; Pharmacy and poison board; Office of the director of public prosecution; National Authority for the Campaign against Alcohol and Drugs Abuse
Lesotho	Police
MALAYSIA - MY	UNSPECIFIED
Republic of Moldova	International Police Cooperation Centre, General Police Inspectorate; Directorate no. 3 (Combating Economic Fraud) of the National Investigation Inspectorate, General Police Inspectorate; 44 Regional Police Inspectorates of the General Police Inspectorate; General Inspectorate of Border Police; Customs Service; National Food Safety Agency of the Republic of Moldova
Montenegro – ME	Police; Customs
Morocco – MA	Police
Nigeria – NG	National Agency for Food and Drug Administration (NAFDAC)
Republic of North Macedonia	

Peru – PE	Police; Customs, Tax Administration; Immigration
Romania	Police
Russia – RU	Police
Rwanda – RW	Police; Customs; Bureau of Standards; Ministry of Health and Agriculture
Singapore	Police
South Africa	Police
Republic of Korea – KR	Korean National Police Agency; Ministry of Food and Drug Safety
South Sudan - SS	UNSPECIFIED
Tanzania – TZ	Police; Customs; Tanzania Food Drug Authority; Tanzania Bureau of Standards; Director of Public Prosecutions; Fair Competition Commission
Thailand – TH	Police ; Customs; Food Regulatory Authority
Togo – TG	Police; Customs; Ministry of Agriculture department
Uganda	UNSPECIFIED
Uruguay	
Ukraine	Police
Vietnam – VN	Police; Customs; Ministry of Public Health; Local Police forces (according to their provincial plan)
Zambia – ZM	Police; Public Health Department of Lusaka City Council; Food and Drug Laboratory, Ministry of Health; Zambia Bureau of Standard
Zimbabwe	Police



## Annex 2: Participation of the private sector

22 firms and associations participated in OPSON VIII.

Name and type	Types of products
CIVB Comité Interprofessionnel des Vins de Bordeaux (Bordeaux Wines Bureau)	Bordeaux Wines, protected by a geographical indication and trademarks
CIVC Comité Interprofessionnel du Vin de Champagne (Association of Champagne producers) – producers association	Sparkling Wine, protected by a geographical indication and trademarks
The Coca Cola Company – firm	Non-alcoholic beverages, trademarks protected
Colgate-Palmolive Company – firm	Healthcare products, especially dental care, trademarks protected <sup>18</sup>
Consorzio di tutela Gorgonzola DOP – producers association	Cheese, protected by a geographical indication
Consorzio di tutela Prosecco DOP – producers association	Sparkling wine, protected by a geographical indication
Danone Group – firm	4 types of edible goods and beverages: fresh dairy products, waters, baby nutrition and medical nutrition, trademarks protected
Diageo plc – firm	Spirits and liquors, trademarks protected
Ferrero Spa – firm	Mainly confectionery, trademarks protected
FOOD INDUSTRY ASIA	A group of leading food and beverage companies
IFSP International Federation of Spirits Producers – producers association	Spirits and liquors, trademarks protected
LAVAZZA	Coffee
Mars – Firm	Various edible goods and drinks, ranging from chocolate, candies, pet food and rice, trademarks protected.
Moët Hennessy – firm	Champagnes, wines and spirits, trademarks and geographical indication protected
Mondelez International Inc.– firm	Confectionery and snacks, trademarks protected
Nestlé – firm	Mainly confectionery, trademarks protected
Red Bull – Firm	Energy drink, trademark protected
Scotch Whisky association – producers association	Scotch Whisky, trademark and geographical indication protected

<sup>18</sup> Seized products infringing the rights of the Colgate Palmolive Company were considered as side seizures, as they were neither food nor beverages.

Tequila Regulatory Council – producers association	Mexican liquor, geographical indication and trademarks protected
The GB Foods, SA	Daily meal products
Unilever – Firm	Various edible goods ranging from ice creams to soups, tea, coffee and condiments, trademarks protected
APIMONDIA	International Federation of Beekeepers' Associations.

### Annex 3: Categories of products

Name of Category	Examples of contents reported
Alcoholic beverages	Raw/ethyl alcohol, champagne, whiskey, vodka, rum, wine, cognac, beer, brandy, tequila, home/locally made brews, and unspecified/unknown alcohol/spirits
Cereals, grains and derived products	Bread, various types of flour, wheat, rice, corn, pea, lentils, pastries, noodle, unspecified cereals and (organic) pasta, beans,
Coffee/tea	Various types of coffee and mixed minced coffee, black tea, green tea, flower and herbal tea.
Condiments	Unspecified sauces, various types of sault, tomato, curry, pesto, chili and ginger sauces, pepper, mayonnaise, balsamic vinegar, spices and (raw) seasoning mixtures, unspecified spices and condiments, traditional condiment mixtures, excluding cooking oil.
Cooking oil	Olive oil, vegetal oil, sunflower oil, unspecified cooking oil, oil fat spread, lampante oil.
Dairy	Butter, different types of cheese, cheese cream, milk, milk cream, milk powder, flavored milk beverages, yogurt, unspecified dairy products, baby formula.
Eggs	Chicken and duck eggs
Food Supplements/additives	Unspecified supplements, 2.4 dinitrophenol, natural plants and fruits extracts, granular isoleucine (raw material), whey protein, unspecified nutrition products, monosodium glutamate.
Fruits/Vegetables/Legumes	Apples, bananas, beans, citrus fruits, onions, goji, cantaloupe, grapes, passion fruits, potatoes, various types of nuts, mushrooms, tomatoes, peppers, sunflower seeds, garlic, beetroots, cabbage, peaches, unspecified (mixed) vegetables, other legumes and fruits.
Meat and meat products	Chicken, duck, various frozen meat, ham, turkey, lamb, pork, lamb, internal organs, sausages, mixed minced/cured meat, meat for kebab, unspecified meat and meat products.
Non-alcoholic beverages	Juice, energy drinks, mineral water, soda, fruit juices, drinkable fruit syrup, fruit tea, honey drinks and unspecified juice.
Seafood	Various types of fish (salmon, tuna, mackerel, bass, cod, haddock, plaice, langoustine, smoked herring, fish kebab), bivalve mollusks, silver fish, shrimp paste, whelks, spider crab, lobster, pink shrimps, red mullet, unspecified fish and seafood.
Mixed products/Other	Mixed packed food products, unidentified finished products and raw materials for food production, various canned food, rice, flower, candies, meat products, alcoholic and non/alcoholic drinks, dairy, olive oil, powder milk, noodles, seafood, packed food, pickles, various fruits and vegetables.
SIDE SEIZURES	Cosmetics, medicines, cigarettes, car spare parts, apparel, medical products, shoes, apparel, toilet blocks, knives and kitchen ware, shoe polish, stationary, electronics, various type of equipment for alcohol and food production, USD dollar banknotes.
Sugar and sweet products	Biscuits, various fruit based/candies, chewing gum, chocolate, various fruit jams assorted sweets and cakes, chocolate spread, confectionary, sweet syrups, honey and sugar.

#### Annex 4: Acronyms and Abbreviations

<b>Acronyms</b>	
EU MS	European Union Member State
IPR	Intellectual Property Right
LEA	Law Enforcement Agency
NPoC	National Point of Contact
OCG	Organized Criminal Group
DNP	2,4-Dinitrophenol
<b>Organizations and Institutions</b>	
EU	European Union
EU COM	European Commission
DG SANTÉ	Directorate General Health & Consumers
INTERPOL IGGH	INTERPOL Illicit Goods and Global Health Programme