



# 2023 Annual Report

## Alert and Cooperation Network



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## **FOREWORD - Director General Sandra Gallina**

When it comes to food safety, this past year has been one of both challenges and important progress in Europe. As we present our comprehensive annual report of the Alert and Cooperation Network (ACN), it is an opportune time to reflect on some of these changes we have experienced over the past 12-months.

This report provides a detailed overview of the ACN's activities and findings throughout 2023. Without giving away too many details, the report highlights an increase in alerts of food, which I believe very much emphasises the diligence and vigilance of the EU's control authorities, as well as the responsiveness of our networks.

We can be proud that our ACN has continued to expand both in terms of reach and impact an increased use of our networks by both Member States and partners further afield. Our four networks - the Rapid Alert System for Food and Feed (RASFF), the Administrative Assistance and Cooperation (AAC), the Agri-Food Fraud (FFN), and the newly integrated Plant Health Network (PH) - have been instrumental in achieving this. We also see the concept of One Health implicitly addressed through the work of the ACN.

Food fraud is a key element of this report. We must never rest on our laurels on ensuring the detection and prevention of food fraud. Citizens rely on us to tackle this growing concern that threatens the integrity of our food systems. From the use of unauthorised food additives, to insufficient labelling, this report provides a comprehensive analysis of various fraudulent practices across our Union.

I very much hope that this report can serve as a valuable resource for all stakeholders in our collective effort to ensure food safety and combat food fraud. The European Commission will continue to remain vigilant when it comes to this, notably by advancing our efforts through state of the art information technology tools and artificial intelligence. We believe this will bring the achievements of the ACN to a whole new level. I look forward to seeing this take shape in the near future, building on the progress already made and addressing the challenges ahead.

Thank you.



## ANNUAL REPORT 2023 – Draft

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### IN BRIEF

The 2023 Annual Report compiles the overview and analysis of information exchanged in 2023 within the Alert and Cooperation Network (ACN) through the electronic system iRASFF. It includes the Rapid Alert System for Food and Feed Network (RASFF), the Administrative Assistance and Cooperation Network (AAC), the Agri-Food Fraud Network (FFN) and the Plant Health Network (PHN).

This report showcases the continued increase in use of the Alert and Cooperation Network by its members and the higher involvement by non-EU countries to collaborate and exchange information.

2023 was the first year that the Plant Health Network was operational and details are provided in this report.

The European Commission, as manager of the ACN, continued to assist ACN members, by providing expertise and support to facilitate the increasing exchange of information.

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# 1.THE ALERT AND COOPERATION NETWORK

The electronic system iRASFF allows the exchange of information between the ACN members. It is managed by the European Commission (EC) and composed of four networks: The Rapid Alert System for Food and Feed (RASFF), the Administrative Assistance and Cooperation (AAC), the Agri-Food Fraud (FFN) and the Plant Health Network (PHN), as established by Regulation (EU) 2019/1715 on the Information Management System for Official Controls (the IMSOC Regulation). The Plant Health Network was newly integrated during the year 2023.



The networks within the ACN enable swift communication among the competent authorities of its members thereby facilitating cooperation. The EC provides support and ensures the correct functioning of all the components.

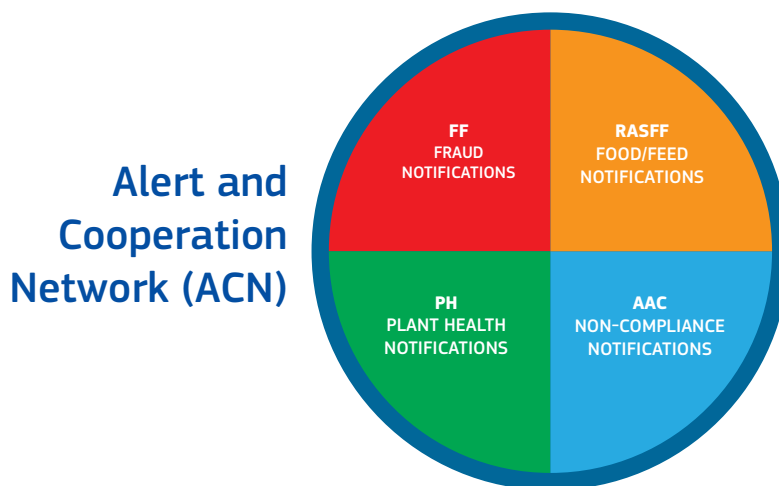
The RASFF facilitates a quick information exchange concerning direct or indirect risks to human health related to food or feed, and risks to human, animal health, or the environment related to feed. Said exchange is performed through RASFF notifications.

The AAC enables competent authorities to share, investigate, and act on non-compliances that do not present a risk within the meaning of Regulation (EC) No 178/2002 and Regulation (EU) 2017/625, except non-serious risks to animal health and risks to plant health or animal welfare. These actions are performed through Non-compliance (AAC) notifications.

The FFN is utilized in cases where potentially fraudulent or deceptive practices are identified. They include non-compliances concerning suspected intentional action by businesses or individuals for the purpose of deceiving consumers and gaining an economic advantage. These cases follow a restricted information flow available only for fraud contact points, as such data are strictly confidential.

The PHN covers information regarding plants, plant products and other objects. Plant Health notifications are created to report non-compliant consignments of these commodities (such as living plants, seeds, fruits, vegetables, flowers, leaves, wood), to share contingency plans regarding plant priority pests, and/or any other plant health issue.

Figure 1: Components of the Alert and Cooperation Network



Members of the ACN are the designated Single Contact Points in EU Member States and in the European Free Trade Association (EFTA) countries (Norway, Iceland, Switzerland and Liechtenstein), the EFTA Surveillance Authority (ESA), the European Food Safety Authority (EFSA), and the European Commission. All members have 24/7 out-of-hours arrangements to address any emergency related to a RASFF notification made outside office hours.

Communication occurs through the “iRASFF” platform, an electronic system that compiles the four networks of the ACN, facilitating the sharing of all notifications.

More information concerning cooperation with Member States and non-EU countries is covered [here](#).

## 2. MAIN ACTIVITIES OF THE ALERT AND COOPERATION NETWORK



All four networks showed an important increase of notifications in 2023 compared to 2022, displaying an 8% increase for RASFF (4695), 24% for AAC (3166) and 26% for FF (758). 128 notifications were created for PH.

Besides original notifications, member countries' authorities and the EC can add further details (such as outcome of investigations, measures taken, distribution to other countries, documents, etc.) through follow-ups and the conversation module. This enables a direct and effective communication to clarify and complete notifications.

As in previous years, more than a third of RASFF notifications were border rejections, involving mainly pesticides residues in consignments of fruit and vegetables from Türkiye, followed by Egypt and India.

The top notifying countries in the ACN remain Germany, the Netherlands and Belgium.

The EC reviews all notifications created in the system and evaluates if the information shared is communicated in the correct network. 57 AAC notifications were escalated to RASFF in 2023 after evaluation. Additionally, 105 notifications were declined from RASFF. An AAC notification is escalated to the RASFF network when a possible health risk is identified. Similarly, when a notification does not present a risk to health, the EC will decline it from RASFF but it may continue in the AAC network instead. Working group meetings are held regularly to address different topics surrounding the system.

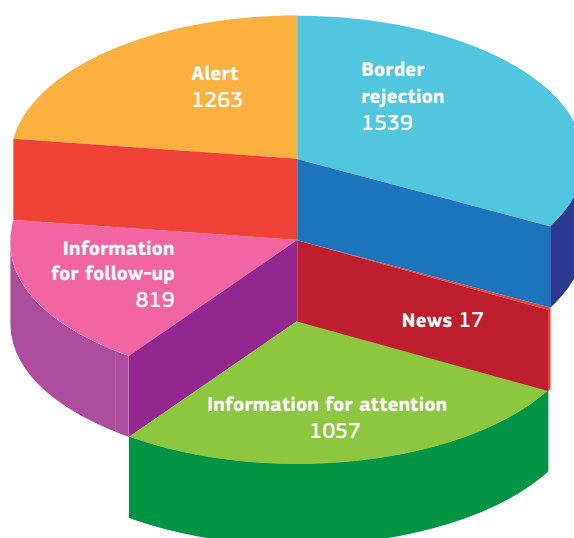
Furthermore, the EC evaluates possible fraud aspects in RASFF and AAC notifications. In 2023, 1075 AAC and 1625 RASFF notifications were highlighted as potential fraud and member countries were encouraged to perform in-depth fraud investigations.

## 3. THE ALERT AND COOPERATION NETWORK IN FIGURES

### 3.1. The Rapid Alert System for Food and Feed Network

In 2023, a total of 4695 RASFF notifications were shared, with 4199 pertaining to food, 303 to feed, and 193 to food contact materials. It presented the highest number of original notifications ever transmitted in the system, with an increase of 8% compared to 2022. Alerts increased by 9% from 2022, information for follow-up by 23%, information for attention by 6% and border rejections by 2%. The number of news notifications remained the same.

*Figure 2: RASFF notifications by type*



**Alerts** are created when food, feed or food contact materials posing a serious risk are present on the market and rapid action is needed in a member country other than the notifying country. The top reported products for this notification type are fruits and vegetables (259).

**Border rejections** concern products that are blocked at the external borders of the EU and the EFTA countries when a health risk is found. It is notable to mention that the information on rejected consignments in the Trade Control and Expert System (TRACES) can be used by border inspectors to create a RASFF notification, thereby highlighting the cooperation among two systems part of IMSOC. The top reported products for this notification type are also fruits and vegetables (648).

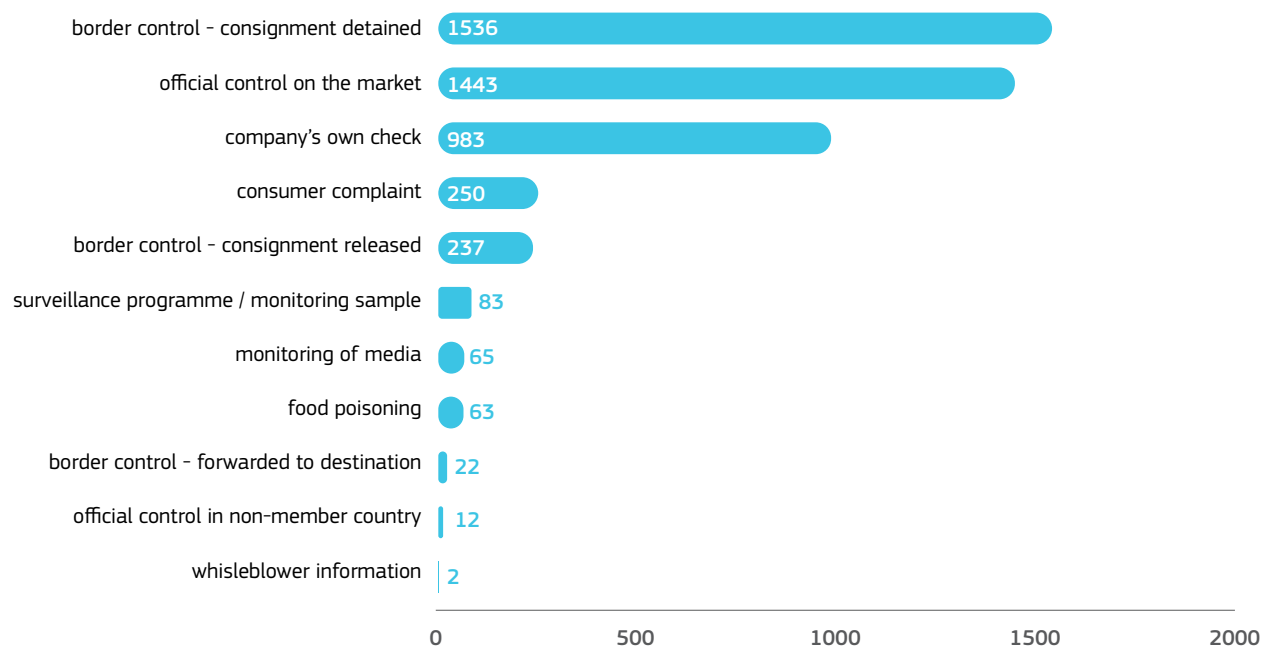
**Information notifications for attention** regard products in which a risk is identified but do not require rapid action as the product was present only in the notifying member country or was not placed on the market or was no longer on the market. Fruits and vegetables were again the top reported category for this notification type (198).

**Information notifications for follow-up** concern a non-serious risk not requiring rapid action by any other involved member countries. In 2023, dietetic foods, food supplements, fortified foods (156) were the product category most reported.

**News notifications** include a risk deriving from food, food contact material or feed that has an informal source, contains unverified information, or concerns an unidentified product.

The most reported notification basis for goods detected on the market was official control on the market (1 443), followed by company's own check (983), consumer complaint (250) and surveillance program / monitoring sample (83) (Figure 3).

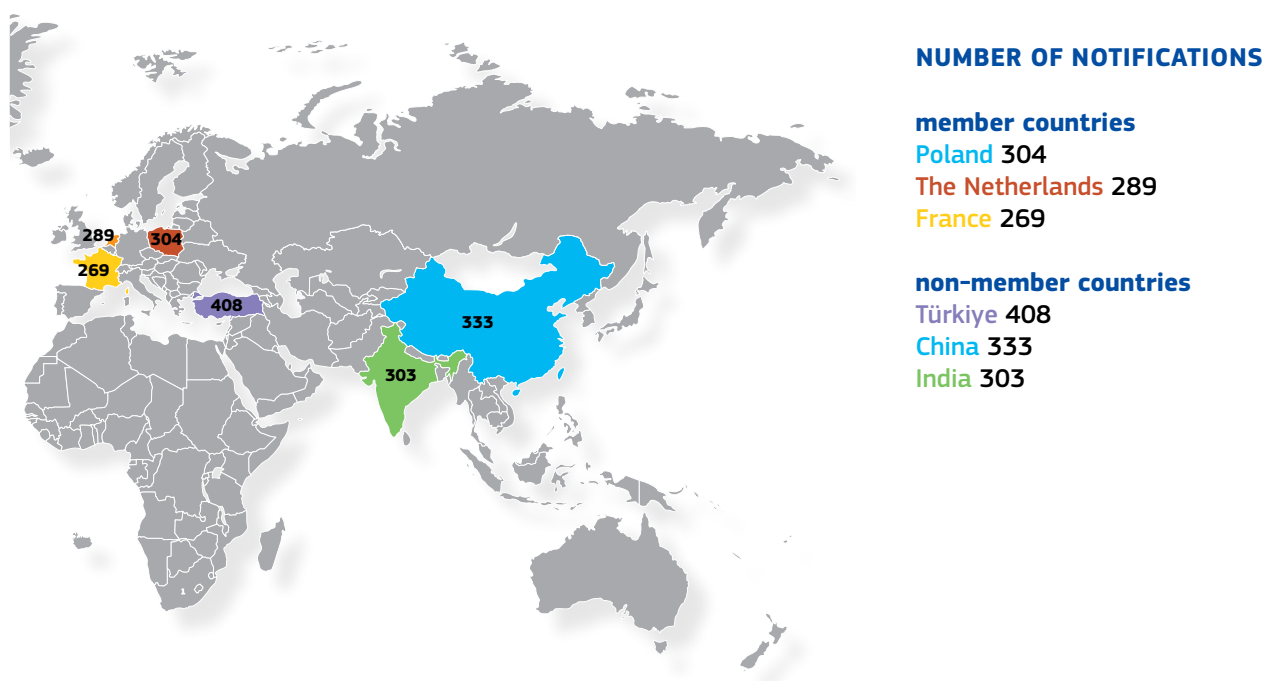
**Figure 3: RASFF notifications by notification basis**



As in the previous three years, Germany remained the top notifying country (592 notifications), followed by the Netherlands (589), France (421) and Italy (411). Notably, in 2023 France increased its activity by more than 50% compared to 2022. The top notifying member countries, in terms of follow-ups created in 2023, were Germany and Italy (with respectively 1954 and 1106), followed by the Netherlands (1051) and Poland (998).

The number of notifications per most reported countries of origin are shown in **figure 4**. In line with 2022, the most recurrent RASFF member countries of origin of products reported were Poland (304 notifications), the Netherlands (289) and France (269). The most recurrent non-member countries of origin were Türkiye (408 notifications), China (333) and India (303).

**Figure 4: RASFF notifications by origin**



The EC systematically informs non-member countries when they are involved in a RASFF notification, either as countries of origin or distribution of the products. Their follow-ups are then communicated to all RASFF members.

In the context of RASFF, incidents are initiated when two or more notifications are linked if they share the same upstream traceability for similar (but not identical) products, or if they concern identical products but different lots. In 2023, 34 incidents were identified, and the most frequent incident type regarded accidental or environmental contamination (14 incidents) covering recurrent topics in RASFF such as microbiological contamination and pesticide residues.

### 3.1.1. Hazard categories

Table 1 shows the most recurrent RASFF notifications in 2023, presented as combinations of hazard category, product category and country of origin of the product. It includes all types of products (food, feed and food contact material), origins and types of control at the borders and on the market.



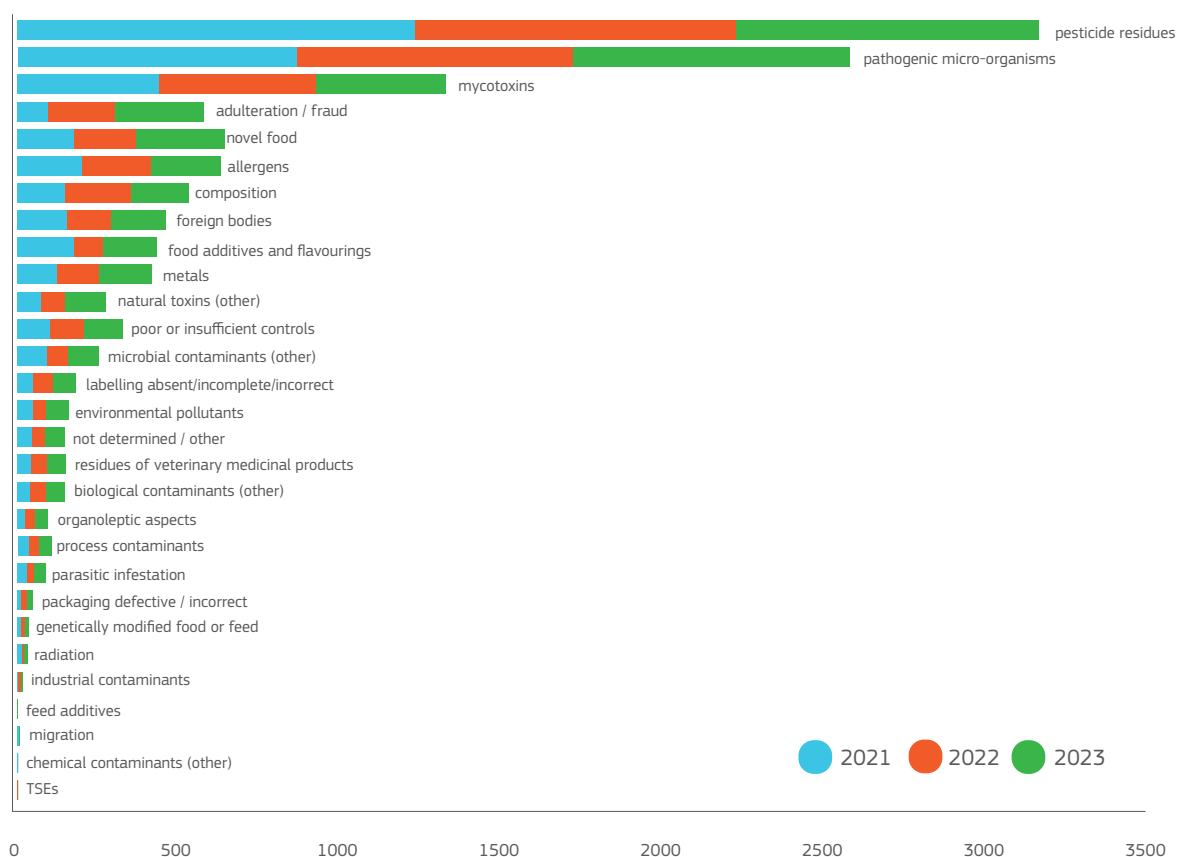
**Table 1: Top 10 count of recurrent RASFF notifications**

HAZARD	PRODUCT CATEGORY	ORIGIN	NOTIFICATIONS
Pesticide residues	Fruits and vegetables	Türkiye	168
Salmonella	Poultry and poultry products	Poland	153
Migration	Food contact materials	China	92
Aflatoxins	Nuts, nut products and seeds	United States	85
Pesticide residues	Fruits and vegetables	Egypt	84
Pesticide residues	Herbs and spices	India	51
Pesticide residues	Cereals and bakery products	India	48
Salmonella	Nuts, nut products and seeds	Nigeria	38
Vibrio	Crustaceans and crustacean products	Ecuador	36
Pesticide residues	Cereals and bakery products	Pakistan	34

Figure 5 displays all hazard categories detected in food (feed and food contact material are thus not included). It is important to highlight that these hazard categories are automatically assigned to each RASFF notification based on its specific hazard in an internal EC database. Pesticide residues, pathogenic microorganisms and mycotoxins were the top notified hazard categories and will be discussed in the following sections.

The category adulteration/fraud only covers certain hazards (i.e. improper or absence of health certificates and analytical report, attempt to illegally import, etc.). Therefore, it does not cover all notifications for which fraud elements were identified (fraud cases will be treated in section 3.3).

**Figure 5: RASFF notifications by food hazard categories 2021–2023**



### 3.1.2. Pesticide residues in food

As reported in the past two years, in 2023 pesticide residues were the most notified food hazard category in RASFF (936 notifications) despite showing a decrease of 24% compared to 2021 and of 5.5% compared to 2022.

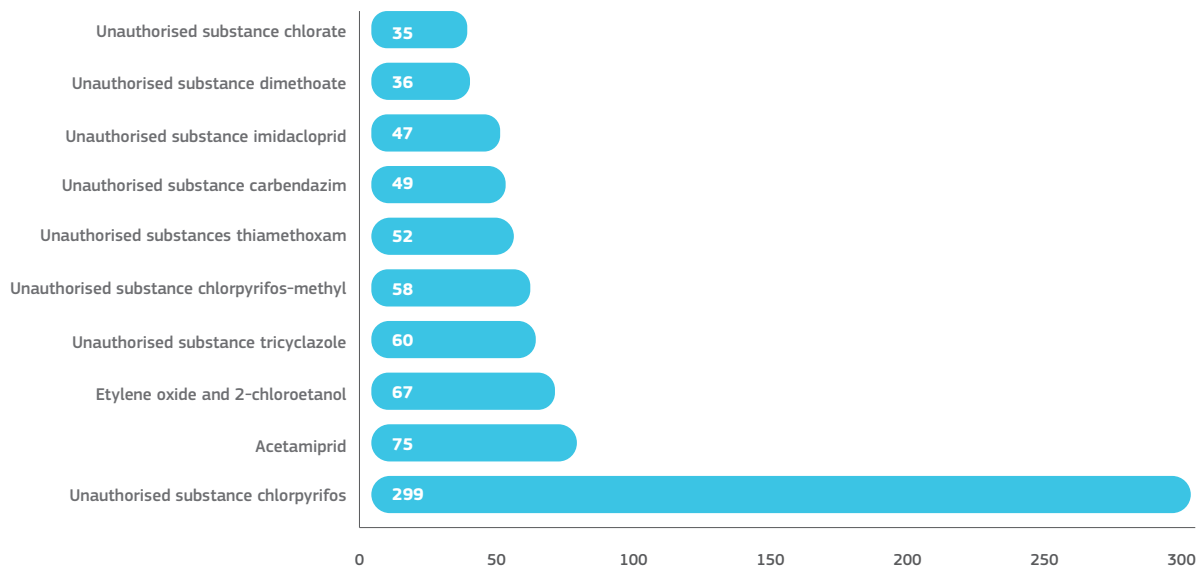
The top reported product category was fruits and vegetables (560 notifications), of which 372 cases were detected during border controls and 188 were found on the market.

Pesticide residues issues in RASFF most frequently involved fruits and vegetables from Türkiye (168 notifications) and, following the pattern of 2022, the top notifying countries were Bulgaria (112) and Germany (70).

As shown in **Figure 6**, the most common pesticides reported were chlorpyrifos (299), acetamiprid (75), ethylene oxide and 2-chloroethanol (67). Compared to 2022, the number of cases for chlorpyrifos-methyl, ethylene oxide and 2-chloroethanol reduced by around 60%. In contrast, chlorpyrifos cases have increased by 19.1%.



**Figure 6: Top 10 pesticides in food in RASFF notifications**

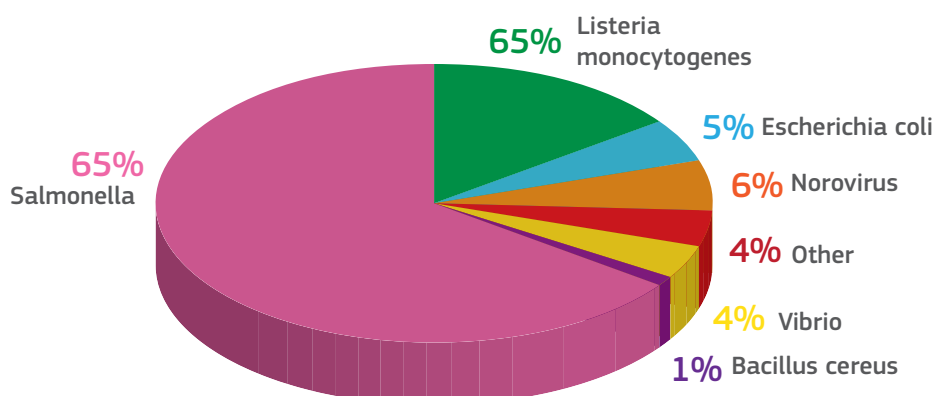


### 3.1.3. Pathogenic microorganisms

During 2023, pathogenic microorganisms were the second most common hazard category in food (856 notifications). The most reported food categories continued to be poultry meat and poultry meat products (316) and nuts, nut products and seeds (93).

Following the same trend as in 2022, *Salmonella* was the most frequent pathogenic microorganism (582 notifications; **Figure 7**), followed by *Listeria monocytogenes* (131), *Escherichia coli* (50) and noroviruses (50), all primarily detected in products of animal origin. Notably, 153 *Salmonella* notifications concerned poultry meat and poultry meat products from Poland. This issue is further discussed in section 3.5.2 of the report.

**Figure 7: RASFF notifications on pathogenic microorganisms in food**



### 3.1.4. Mycotoxins

In line with previous years, mycotoxins were the third most notified hazard category with 401 notifications, with a 17% decrease compared to 2022. Notifications mainly concerned the detection of aflatoxins (331), and the most common product category was nuts, nut products and seeds (226). The most reported origin for these cases was the United States (85).

### 3.1.5. Foodborne outbreaks

Notifications concerning foodborne outbreaks in RASFF amounted to 48. Among them, Norovirus was identified as the (probable) cause in 17 cases, *Salmonella* in 11, *Listeria monocytogenes* in 5, histamine poisoning in 2 and *Escherichia coli* in 2 cases.

Of these 48 notifications, 18 were associated with a foodborne outbreak spanning multiple countries. In such instances, EFSA and the European Centre for Disease Prevention and Control (ECDC), following consultation with the EC, may decide to initiate a collaborative action. This action can also be triggered by the EC.

A joint EFSA-ECDC action may manifest as a publicly available Rapid Outbreak Assessment (ROA) or a non-public Joint Notification Summary (JNS). Both are collaboratively developed by EFSA and ECDC in close coordination with affected countries. The ROA provides an overview of the public health situation and potentially identifies the contaminated food vehicle responsible for the outbreak. It incorporates results from trace-back and trace-forward investigations, aiding in pinpointing the origin of the outbreak and the distribution of contaminated products. Network members involved in the outbreak utilize RASFF notifications to communicate their ongoing food investigations. Upon completion, EFSA and ECDC release an anonymized version of the ROA on their website.

#### ROA in 2023:

**19 December 2023** - Prolonged multi-country cluster of *Listeria monocytogenes* ST155 infections linked to ready-to-eat fish products. Available [here](#).

**3 November 2023** - Three clusters of *Salmonella* Enteritidis ST11 infections linked to chicken meat and chicken meat products. Available [here](#).

**2 August 2023** - Multi-country outbreak of *Salmonella* Senftenberg ST14 infections, possibly linked to cherry-like tomatoes. Available [here](#).

**30 March 2023** - Multi-country outbreak of *Salmonella* Virchow ST16 infections linked to the consumption of meat products containing chicken meat. Available [here](#).

A Joint Notification Summary (JNS) is a working document to inform about a smaller scale multi-country foodborne outbreak with a brief preliminary assessment made by ECDC and EFSA, shared only in the Early Warning and Response System (EWRS), in the Epidemic Intelligence Information System (EPIS) and RASFF platforms.

### 3.1.6. Other hazard categories

Novel foods ranked fifth most reported hazard category, of which cannabinoids were the main highlight and will be treated in a detailed section (3.5.1). These were followed by allergens (217 notifications), mainly in relation to prepared dishes and snacks (41 notifications). It is worth mentioning that milk related allergens were the most notified (39). In addition, cases related to composition of products were also recurrent (231 notifications) and concerned primarily dietetic foods, food supplements, fortified foods (106).

### 3.1.7. Feed

In 2023, 303 RASFF notifications were shared on feed. Issues were mainly detected during official controls on the market (94 notifications) and company's own checks (99).

*Salmonella* was the most reported hazard (111). Other frequently reported microbial contaminants were mold in feed materials, with recurrent notifications by Poland on batches of sunflower meal from Ukraine (20) and by Portugal on wheat bran from Angola (13 notifications). *Enterobacteriaceae* were also often identified (15) with 8 cases involving dog chews.

As in 2022, 17 notifications related to non-compliant composition, and the most common hazard was too high content of ragweed (*Ambrosia spp.*) seeds (11) in other plant produces.

23 notifications concerned mycotoxins, and primarily regarded aflatoxins (21). Pesticide residues were reported in 19 cases, which mainly concerned chlormequat (4) and chlorpyrifos (4). Metals residues in feed were notified 16 times, of which 9 notifications concerned the presence of lead, specifically 4 of them were detected in dog feed.



### 3.1.8. Food contact material

193 notifications were received concerning food contact materials, 36% of these related to the migration of substances like primary aromatic amines (40 notifications), formaldehyde (16) and lead (15). Most products (124) originated from China. Lastly, the top notifying member countries were France (37), Italy (31) and Ireland (21). Table 2 shows the most reported migrating compounds on specific contact materials.



*Table 2. Food contact materials and top substances reported*

FOOD CONTACT MATERIAL	COMPOUNDS MIGRATING
nylon	primary aromatic amines
melamine	formaldehyde, melamine
silicone	volatile organic constituents
lids of jars, cardboard	plasticizers, lead
ceramics, decorated glass	zinc, arsenic, aluminium, cadmium, lead
metal	lead, chromium

### 3.1.9. Capsaicinoids in corn flour snacks: The “Hot chip challenge”

In 2023, there was a surge in the global popularity of chips infused with intensely spicy chili sauces and extracts derived from peppers. A Texas-based company introduced the “One Chip Challenge” which involved consuming in one go one of their individually wrapped spicy tortilla chips. This escalated to an international trend where people recorded themselves attempting to eat the product and shared the videos on social networks.

With the consumption of this product, adverse reactions such as nausea, vomiting, high blood pressure, burning eyes, and irritation of mucous membranes may occur. Despite these effects, the product is not considered illegal as it contains ingredients permitted for use in food.

In September 2023, the death of a child in the United States was associated with the consumption of one of the single tortilla chips. The company indicated in their press release that it is clearly stated on the label that it is only to be consumed by adults.

In October, Switzerland issued a RASFF notification triggered by findings of 9300 mg/kg of capsaicinoids in hot chip tortillas manufactured by a Czech company. Based on the Swiss risk assessment, 6000 mg/kg of capsaicinoids are the maximum estimated value for consumption by a healthy adult of 60 kg of body weight. Within two weeks, Germany transmitted analytical reports with findings between 4000 and 15000 mg/kg of capsaicinoids in different samples. Due to the significant variation in capsaicinoid levels, consuming the entirety of the product at once can pose a health risk. The Czech competent authorities stated that consumers are sufficiently informed of the extreme spiciness of the product by the manufacturer, highlighting that each packaging even contains gloves to handle the chip. However, German authorities pointed out that the warning in English language was not sufficient. According to the Italian antimonopoly authority, the specific marketing used to increase the attractiveness and sales of the product lead in particular young consumers to disregard the warnings.

During November and December, the product was found to be distributed via many European wholesalers to 23 EU countries and three non-EU countries, and to also be available for online sale. On the 27 of November, the Czech Republic reported the suspension of the placing of the product on the market. A new packaging traded under the name “Hot Chip Challenge 2,8g New Recipe” containing lower capsaicin content was marketed afterwards.

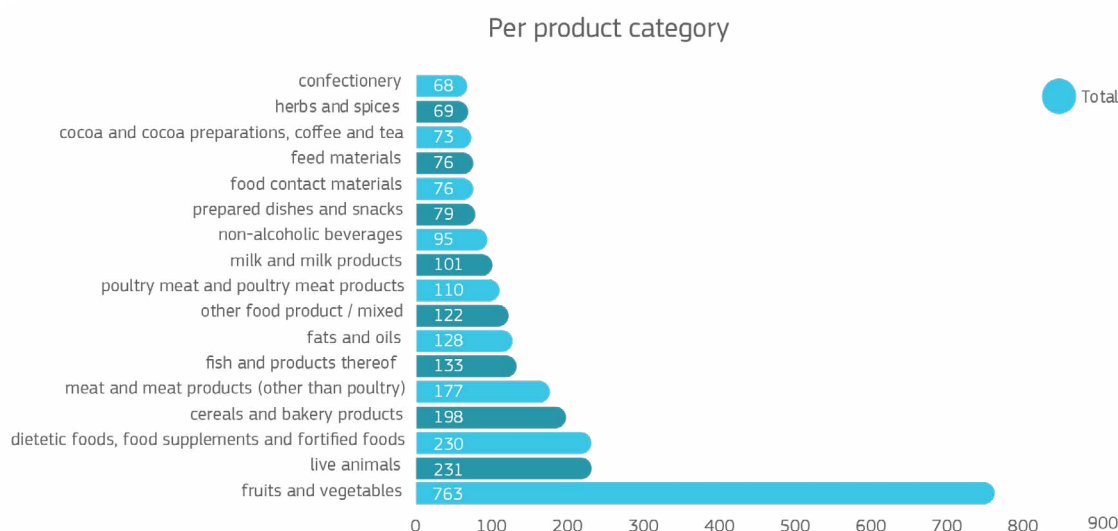
### 3.2. Administrative Assistance and Cooperation Network

In 2023, AAC notifications have reached 3166, presenting a 24% increase from 2022 and nearly doubling compared to 2021. Germany created the highest number of notifications (29.3%), followed by Bulgaria (12.8%) and Austria (7.5%).

Close to 60% of notifications implicated products from within the EU, with the remainder stemming from countries outside the EU.

Following the trend of 2022, in 2023, the vast majority of AAC cases concerned cases involving food (86.6%), followed by live animals (7.3%), feed (3.7%) and food contact materials (2.4%).

**Figure 8: AAC notifications per product category**



As shown in **figure 8** and in line with data since 2019, the top notified product category was fruit and vegetables (24%), facing a 72% increase compared to 2022. With 642 out of 763 notifications, pesticide residues reporting is on the rise in AAC. Fenbutatin oxide and acetamiprid were the most recurrent pesticides, with the former being a non-approved pesticide in the EU, whilst the latter is approved but the imposed Maximum Residue Levels (MRLs) were exceeded. More significantly, most notifications concerned products sampled at the border and rejected from entry on the European market. Their purpose was therefore to inform other member countries about the non-compliance.

Live animals ranked second most reported product category in AAC (7.3%) with a 122% increase from 2022. 77% of cases regarded lacking or improper documentation or controls pointing out incorrect, non-compliant or missing health certificates and/or missing identification documents.

Dietetic foods, food supplements and fortified foods (7.2%) ranked in third place. About half of these concerned faulty labelling or claims, mainly attributing preventing, treating, and curing properties to food supplements (e.g. prevention against depression, anti-inflammatory and slimming effects). Another recurrent issue was non-compliant composition (59), regarding primarily the mismatch between the labelled substances and the analytically detected values in the product (e.g. vitamins and minerals) or the use of unapproved novel foods or novel food ingredients.

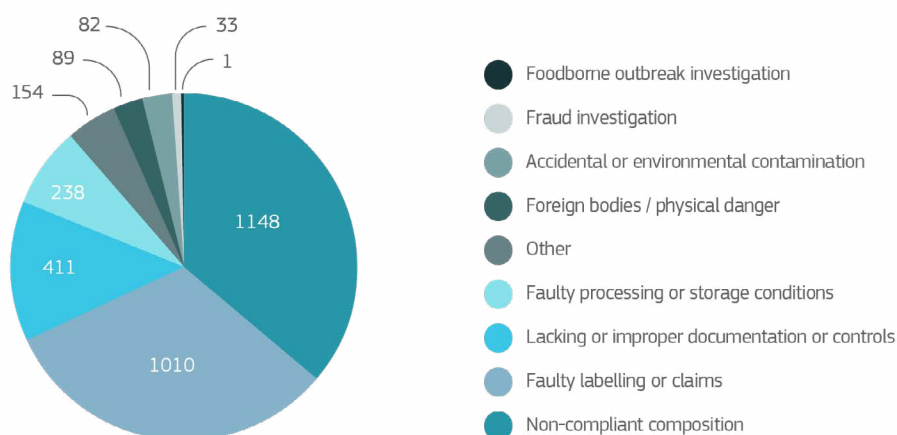
Cereals and bakery products ranked fourth (6.3%), mainly with issues relating to findings of pesticides and additives (at levels not posing a health risk). In addition, several cases involved discrepancies in the list of ingredients and/or nutritional tables, as well as incorrect production and/or durability dates.

Another recurrent category was meat and meat products (other than poultry) (5.5%). These were reported mainly for faulty labelling or claims (79), frequently concerning non-compliant denominations, ingredient lists, nutrition declarations or expiry dates. Lacking or improper documentation issues (29) as well as faulty processing or improper documentation or controls (29) were also common non-compliances, with the former relating to non-compliant or missing official certificates and the latter to poor hygiene conditions and poor temperature controls.

Lastly, fish and fish products (4.2%) mostly concerned faulty labelling or claims (44) issues on non-compliant or missing indications of the weight (net or drained), water ice glaze, or storage conditions. Moreover, several cases on poor hygiene conditions were created under faulty processing or storage conditions (32).

## NON-COMPLIANCE CATEGORIES

Figure 9: AAC notifications per non-compliance category



As shown in **Figure 9**, the top reported non-compliance category was non-compliant composition (36.3%), with a vast majority of cases on pesticides residues found above their MRL, but in which the assessment determined no risk to health.

The second most reported category was faulty labelling or claims (32%), including cases concerning incomplete or missing labels (e.g. list of ingredients, nutrition declaration) or use of unauthorized health claims.

Lacking or improper documentation or controls (12.9%) presented cases on non-compliant or lacking information in a wide variety of documents, including trade and transport records, health certificates, as well as animal identification documents. This category mainly involved products of animal origin or live animals, for which a number of documents are required for their transport and trade.

Faulty processing or storage conditions represented 7.5% of notifications, including microbiological contaminants, poor temperature control during transport and poor hygiene conditions at the establishments of the operators.

4.8% of the cases reported (doubled from 2022) were classified as “other” and mainly concerned requests for assistance between member countries related to the exchange of information such as analytical methods, verification of operators, and implementation of national or European legislation.

The remaining notifications fall under non-compliance categories such as foreign bodies (2.8%) and accidental or environmental contamination (2.6%).

The EC ensures that any AAC notification with a possible health risk is correctly evaluated and, if necessary, escalated to the RASFF system.

### 3.3. Agri-Food Fraud Network

The number of notifications related to suspicions of fraud reached a total of 758, showcasing a 26.3% increase in the use of the network by member countries authorities compared to 2022.

More than half of the notifications (414) concerned the illegal trade and cats and dogs due to a specific EU Coordinated Action ending in 2023. This action is presented in detail in section 3.3.1. The following analysis concerns the other 344 notifications relating to all other product categories.

The countries which notified the most on fraud suspicions were Belgium (18.3%), followed by Germany (16.5%) and France (10.7%), meaning the top three remain unchanged in relation to previous years. Notifications created by the EC amounted to 3.4% in 2023, sharing specific intelligence such as whistleblower information.

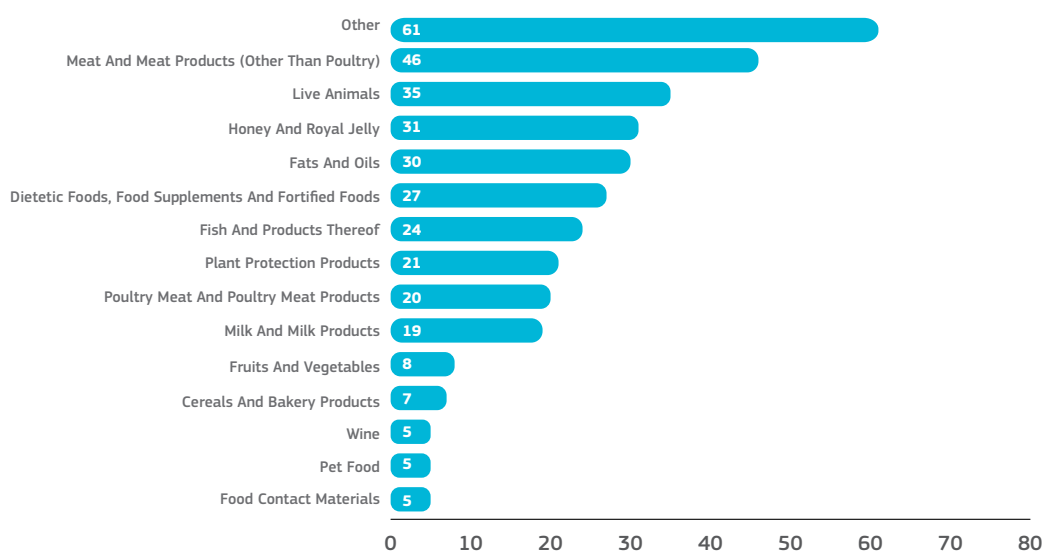
## PRODUCT ORIGINS

The majority of the products reported originated from the EU, representing 71.1% while 24% were imported from non-EU countries. For a small percentage of notifications (4.8%) the origin was not known or still under investigation.

Regarding goods coming from EU countries, 8.2% concerned France and the Netherlands. For the latter, the most recurrent issues were adulteration of poultry products and mislabeling of meat products, while for goods coming from France many notifications concerned document forgery of live animals. As to the cases relating to products of non-EU origin, 5.4% concerned China and 3.4% covered products of Turkish origin, mostly involving suspicions of adulteration of honey.

## PRODUCT CATEGORIES

Figure 10: Number of food fraud notifications by product categories



The most notified product category in 2023 was meat and meat products (other than poultry), covering 13.3% of the total food fraud notifications. Common issues reported were ingredient or species substitution and misleading labelling.

As in 2022, live animals (excluding pet animals) were the second most reported category (10.1%) and like in previous years, it concerned mostly horses. Fraud suspicions were divided almost evenly between smuggling and forgery of mandatory documents, like animal passports and health certificates.

Although the EU coordinated action on honey reached its conclusion in 2022, honey and royal jelly remained in the top three notified product categories, representing 9% of the total requests. The main practice notified was the adulteration of honey by dilution with sugar syrups.

An increase of cases on fats and oils (8.7%) can be seen in comparison with 2022. The majority concerned quality terms or mislabeling matters, where lower quality olive oil was sold as extra virgin olive oil.

Fraud suspicions regarding dietetic foods, food supplements and fortified foods (7.8%) have continued increasing in number. Similar to notifications regarding these products in 2022, the majority of cases concerned the addition of unapproved substances and unauthorized use of health claims.

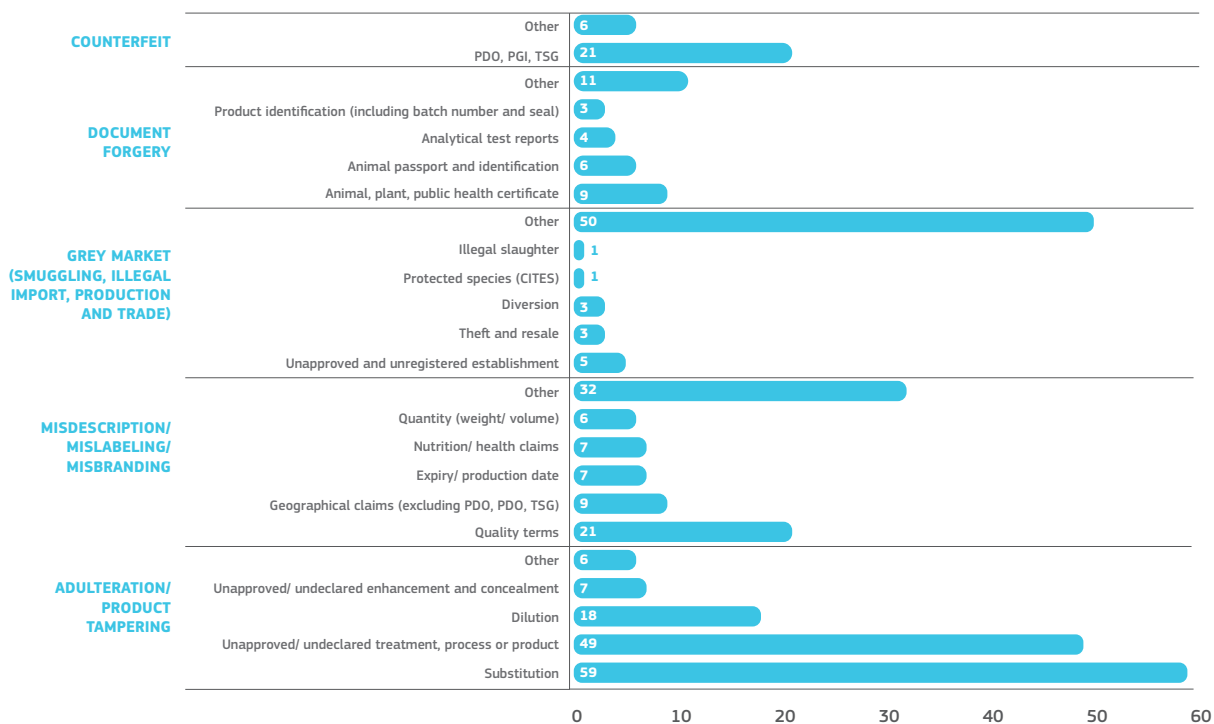
Fish and related products represented 6.9% of the total notifications. Like in 2022, the primary reported fraud suspicion for these products was substitution with lower value species or in relation to an undeclared addition of water. Similarly, these practices were also reported for poultry meat and poultry meat products (5.8%).

The category plant protection products went up to 6.1%, in which the illegal use and/or trade were the main focus and will be discussed in section 3.3.2.

Lastly, requests concerning milk and milk products amounted to 5.5%. More than a half were notified by Cyprus and Greece in relation to violations of Protected Designations of Origin (PDO), Protected Geographical Indications (PGI) and Traditional Specialties Guaranteed (TSG).

## AGRI-FOOD FRAUD CATEGORIES

Figure 11: Food fraud notifications by agri-food fraud categories and subcategories



As shown in **figure 11** and as in the previous year, the top reported fraud category was adulteration/product tampering (40.4%). The definition of this category is the following: “addition of a foreign or inferior quality substance or element; by replacing a more valuable substance or element with less valuable or inert ingredients, so that they no longer match the implicit or explicit claims associated with the agri-food product”. Cases classified as such were often flagged as species or ingredient substitution (59) mostly in products of animal origin like honey, meat, poultry, and fishery products. Other notifications dealt with the unapproved/undeclared treatment, process or product (49) of various goods, for example dietetic foods, food supplements and fortified foods (14).

Misdescription/mislabeling/misbranding (23.8%), which is defined as “placing of explicit false claims or distorting the information on the label/packaging”, was the second most notified fraud category. Issues varied in nature, being most commonly about quality, expiry/production date, geographical or nutrition/health claims.

Grey market represented 18.3% of the notifications created in 2023. This type of fraud entails “production, theft, and diversion involving unauthorized sales channels (traceability issues)”. Several requests included the smuggling of live animals (19) or of plant protection products (9).

Document forgery (9.5%) is described as “the process of creating, adapting, altering, misrepresenting or imitating documents such as certificates, passports, analytical test reports, declarations of compliance and other identification, administrative documents”. As live animals constituted the second most notified product category, it is foreseeable that several requests on document forgery had for subject animal passport and identification (6) or animal, plant, public health certificate (9).

Finally, the least notified fraud category (7.8%), counterfeit, is defined as “Intellectual Property Right (IPR), including any aspects of the genuine agri-food product or packaging being replicated, for instance the process of copying the brand name, packaging concept or processing method for economic gain”. A great number of these notifications dealt with PDO and PGI goods belonging to the product category milk and milk products (14), for example, feta or halloumi cheeses.



### **3.3.1 EU Coordinated Action (Illegal trade of cats and dogs)**

During the year 2023, a total of 414 fraud notifications involving illegal trade and movements of cats and dogs were directly created in the FFN. Additionally, 87 non-compliances were notified, among which 45 represented a suspicion of fraud practices. The countries creating the most notifications were Germany, Austria, Slovenia, Belgium and Italy. Regarding the origin of the animals, the primary suppliers within the EU were Romania, Hungary, Poland and Bulgaria. 37% of notifications involved animals directly originated from non-EU countries, primarily from Belarus/Russia, Ukraine, Serbia and Türkiye.

These notifications predominantly pertained to severe violations, such as document forgery (EU Pet Passports, Animal Health Certificates, rabies titration results), which involves providing false information regarding the age, origin, or rabies vaccination status of dogs and cats. Furthermore, 72 notifications directly mentioned animals being advertised and purchased through online platforms, which currently serve as the primary sales channel. Moreover, 114 notifications highlighted cross-border animal welfare concerns despite the non-obligatory nature of declaring animal welfare issues.

The EU Enforcement Action on illegal trade of cats and dogs, launched in July 2022 by DG SANTE, came to an end in July 2023 but the number of notifications concerning illegal trade and movements of cats and dogs remained stable and continued to represent a significant percentage of fraud notifications in the second half of the year. This action was carried out by the EU Agri-Food Fraud Network, and involved, besides the animal health and welfare experts, border and customs officers, tax authorities, Europol and law enforcement agencies (within the framework of the EMPACT Envicrime sub-action on illegal pet trade). Collaboration with customs was supported by DG TAXUD. For the first time, European Animal Welfare Associations (Eurogroup for Animals, the EU Dog & Cat Alliance, FOUR PAWS) were invited to take part in a coordinated control action. The action confirmed that the significant proportion of traders abuse the EU legislation on non-commercial movements of pet animals to disguise commercial activities, profiting from less stringent control rules and evading taxation, as the current legislation allows pet owners to travel with up to five pets in a more flexible control and tax framework. Some shelters or animal welfare associations are also suspected to take advantage of their status to illegally breed or trade dogs from non-EU countries through online advertisements and sales for a “symbolic fee” of few hundreds of euros to cover alleged costs of transport or care.

### **3.3.2. Plant Protection Products**

In May 2023 DG SANTE started the EU enforcement action on illegal plant protection products, which will continue until April 2024. The action is carried out by the EU Agri-Food Fraud Network, in close cooperation with Europol, within the framework of the EMPACT Envicrime sub-action on phytosanitary products as well as on IPR-related cases in operation Silver Axe. These actions mark the first time where three enforcement actions simultaneously target illegal pesticides trade from various competent and law enforcement authorities’ perspectives.

Coordination of the actors, as well as the dissemination of confidential information between the authorities, albeit sometimes challenging, are key to the success of the action.

### **3.4. Suspicions of fraud in AAC and RASFF**

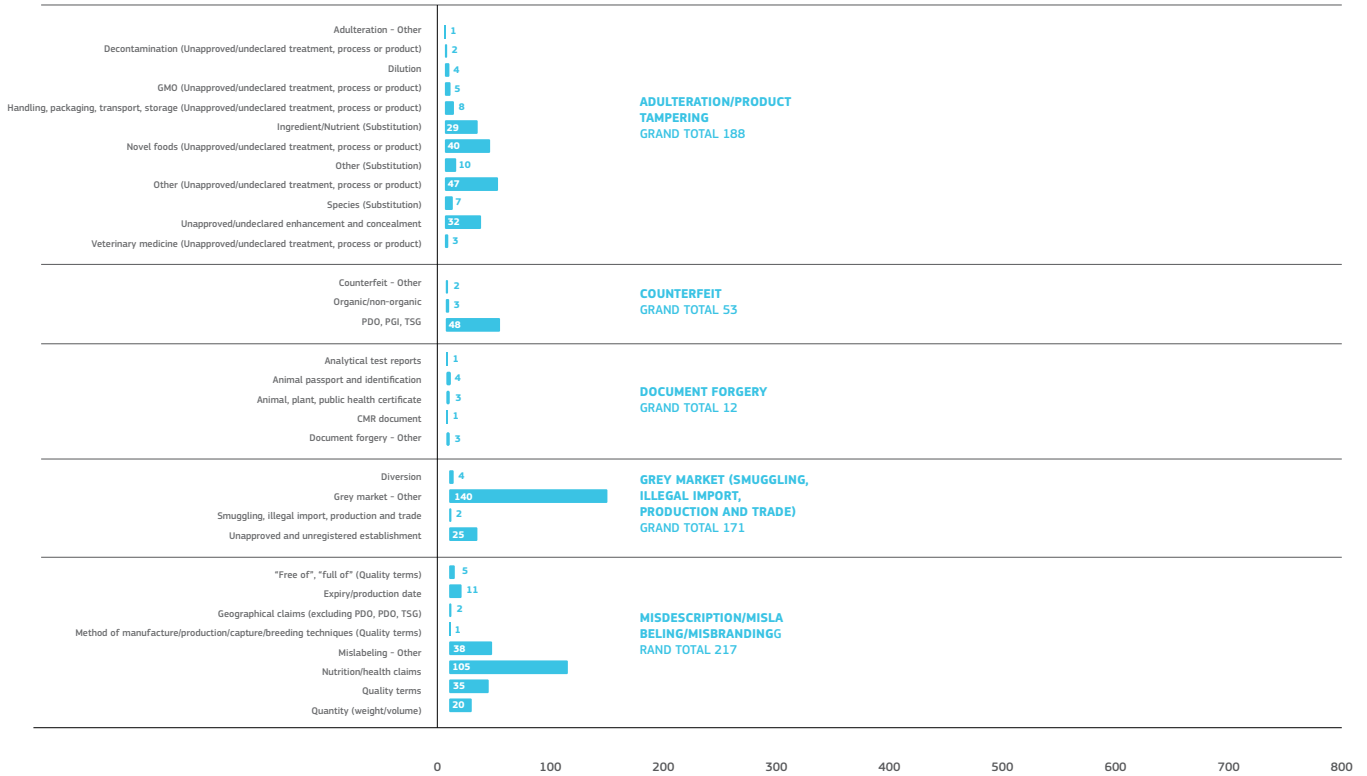
The EC screens all the notifications involving non-compliances, food fraud and RASFF created in iRASFF on a weekly basis to identify potential intentional violations of the EU agri-food chain legislation, which may have remained unnoticed, or if the case requires coordination and follow-up at EU level. These cases are highlighted to the competent authorities, who are then requested to provide clarifications or carry out appropriate fraud investigations. In 2023, this regular screening of information allowed the EC to identify suspicions of fraud in 1075 AAC and 1625 RASFF notifications. Comparatively to 2022, this represents an increase of 100% for AAC and 40% for RASFF.

### 3.4.1. Fraud suspicions in figures

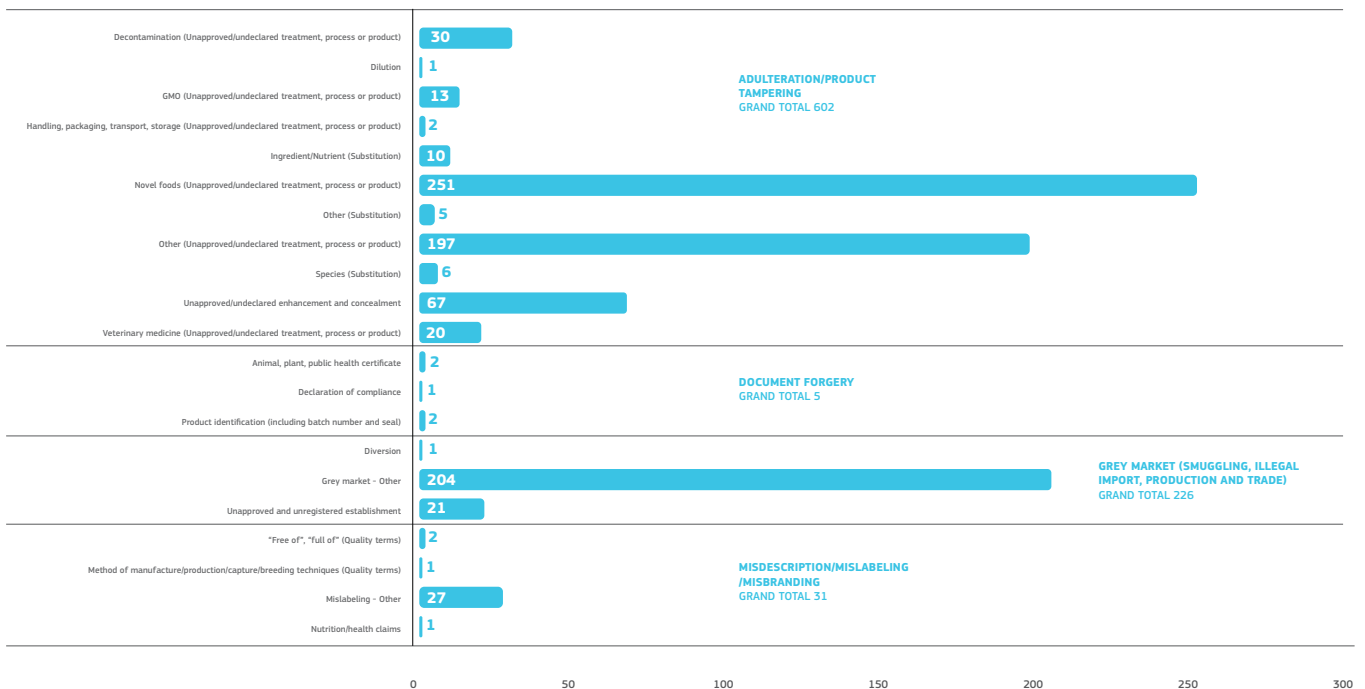
In line with 2021 and 2022, the use of pesticides that are not approved in the EU were the most common cases detected for non-compliances (434 notifications) and RASFF (761 notifications) in 2023.

Chlorpyrifos was the most reported pesticide (282 notifications). In nine out of ten cases, these goods originated from non-EU countries, where the legislation might differ and may allow such treatments. In the European Union, these substances are not approved and could be a signal of fraudulent practices.

**Figure 12: AAC notifications with a suspicion of fraud by agri-food fraud categories and sub-categories (except pesticides)**



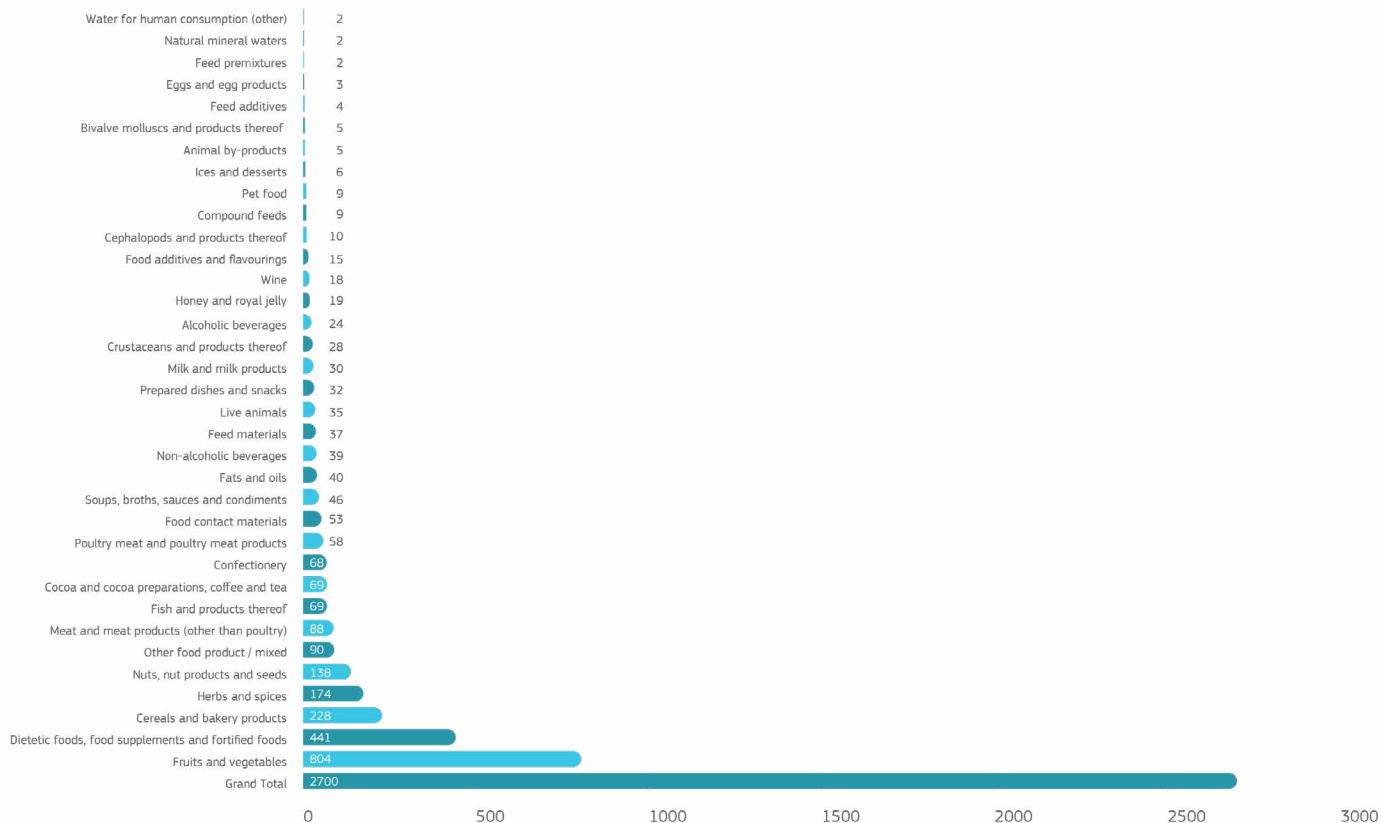
**Figure 13: RASFF notifications with a suspicion of fraud by agri-food fraud categories and sub-categories (except pesticides)**



In the course of 2023, fraud suspicions elements were identified in 441 cases (140 AAC and 301 RASFF notifications) on dietetic products, food supplements, and fortified foods. The latter therefore ranked second as the most notified product category, following fruits and vegetables (804 cases). Within this category, products are vulnerable to three main fraudulent practices: the use of unauthorized novel foods (195 cases, of which 97 concerned cannabinoids), of unauthorized processes, treatments, or products (89 case), and of unauthorized claims regarding nutrition and health (76 cases).

Simultaneously, two-thirds of notifications regarding unauthorized novel foods pertain to dietetic products, food supplements, and fortified foods.

**Figure 14: AAC and RASFF notifications with a suspicion of fraud by product categories**



### 3.4.2. Communication with non-EU countries on fraud suspicions

70% of suspicions of fraud (RASFF, AAC) involve products coming from outside the EU. Therefore, the EC regularly contacts non-EU countries to inform and request the competent authorities to conduct investigations, trace similar products sold to the EU, and provide information on the measures taken to guarantee the prevention and control of fraudulent or deceptive practices throughout the agri-food chain. This plays a pivotal role in cross-border cooperation to fight fraud.

Whereas until 2021 the EC relied exclusively on official letters to interact with non-EU countries about these matters, 2022 marked the start of a new approach of communication. iRASFF allows to share the information directly with authorities for RASFF notifications, allowing to liaise more efficiently and consistently.

### 3.5 Other topics in the ACN Network

#### 3.5.1. Cannabinoids in food

The hemp plant (*Cannabis sativa L.*) contains more than 100 different cannabinoids, the most common one being cannabidiol (CBD). In 2020, the Court of Justice of the European Union concluded that cannabidiol (CBD) should not be considered as a drug within the meaning of the United Nations Single Convention on Narcotic Drugs of 1961, having no psychotropic effects. Therefore, it is considered as a food in the EU, and it falls under the scope of the novel food regulation thus requiring authorization before it could be placed on the market.

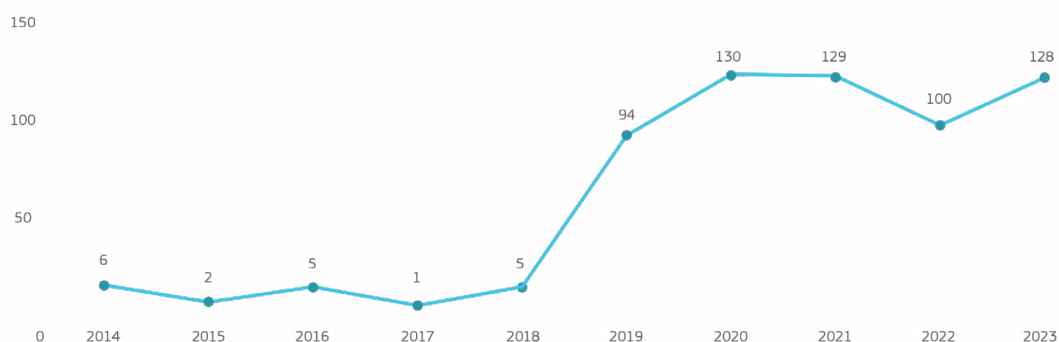
In the absence of contradictory evidence, cannabinoids are considered to pose potential health risks to consumers. Consequently, CBD is presently not authorized for use in any food product, making it ineligible for sale on the EU market.

Approximately 20 CBD food applications have been deemed valid by the Commission and are currently undergoing risk assessment by the European Food Safety Authority (EFSA).

On the contrary, cannabinoids derived from tetrahydrocannabinol (THC) are classified as drugs. In the context of food, they are subject to regulation solely under contaminant regulations for hemp seeds and products derived from them. The presence of THC as a contaminant in other CBD-containing foods is not yet regulated, as these products cannot legally be marketed in the EU until they undergo the novel food authorization process.

In 2023, cases of cannabinoids in food were reported in 128 notifications in the ACN (Figure 15), with two-thirds of them involving CBD. All were considered as a suspicion of fraud and the EC suggested member countries to act accordingly.

Figure 15: Cannabinoids cases reported in the ACN



#### 3.5.2. “Kebab” meat products

In September 2023, 2 RASFF notifications (2023.6376 and 2023.6404) were created by Austria due to the presence of *Salmonella spp.* in chicken kebab skewers. The samples of both notifications were taken to investigate a case involving a fatality suspected to be caused by infection with *Salmonella* and a multicountry outbreak linked to the consumption of chicken kebab from Poland.

The Joint ECDC-EFSA Rapid Outbreak Assessment published on the 26th of October conveyed the following information: from January 1st to October 17th, 2023, 237 laboratory-confirmed cases of *Salmonella Enteritidis* ST11 were identified across 14 EU countries, the United Kingdom and the United States, distributed among three distinct microbiological clusters and affecting individuals of all age groups. Most interviewed cases reported consuming chicken meat, including chicken kebabs. This outbreak posed a potential risk of severe and fatal infections, with nine cases hospitalized across three countries and one fatality reported in Austria.

Food safety authorities in Austria, Denmark, and Italy investigated a total of 10 food products, six of which were contaminated by *Salmonella Enteritidis* ST11 clusters 1 and/or 2, along with seven final producers in Poland and one in Austria. Traceability efforts identified three *Salmonella*-contaminated kebabs linked to Polish food business operators. The trading link of the suspected kebabs suggested a common source or sources of contamination in Austria, Denmark, and Italy.

During these investigations, defects on the traceability of the products were also detected and a suspicion of

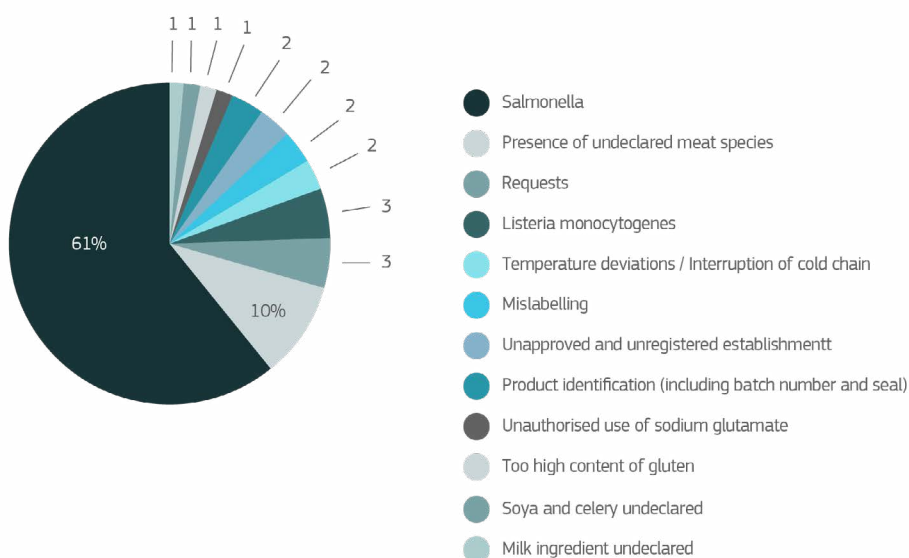


forged labels was raised. Therefore, two food fraud notifications (FF23.6830 and FF23.6791) were created by Poland to investigate the fraud perspective of the cases.

These notifications raised the attention of the EC and data analysis on kebab products reported in RASFF, AAC and FF was performed. In the course of 2023, 61 cases (40 RASFF, 14 AAC and 7 FF notifications) were received on kebab meat originating from an EU country and represented an increase of 290% of notifications on such product since 2021.

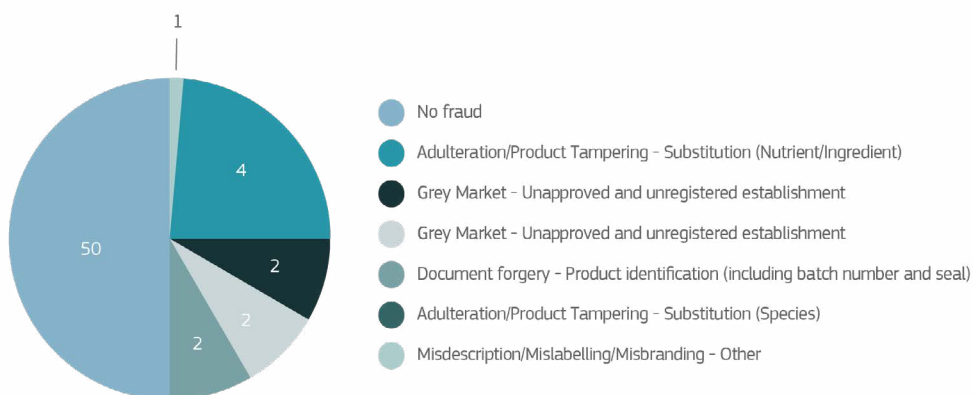
In 2023, the top notifying countries were Austria (30%) and Poland (28%) followed by Germany (15%) and Sweden (10%). 71% of the kebab meat products notified were produced in Poland, 11 % were produced in Germany and 3 % in Italy, France, Denmark and Czechia respectively.

**Figure 16. Notifications involving kebab meat in the ACN by hazard name**



Regarding the type of hazards, as visible in **Figure 16**, the majority of notifications (61%) concerned the presence of *Salmonella*, followed by undeclared meat species such as chicken, turkey or horse (10%). Cases regarding *Listeria monocytogenes*, temperature deviations and rupture of the cold chain during transport, mislabelling, product identification, unregistered operators, unauthorised and undeclared ingredients were also received.

**Figure 17. Notifications involving kebab meat in the ACN by fraud categories**



Out of a total of 61 notifications, 11 were identified with a suspicion of fraud. Figure 17 showcases that 36% of the notifications were related to meat substitution (e.g., undeclared presence of chicken meat, turkey, pork, and horse meat undeclared in kebab). 4 notifications were classified a document forgery (4%), involving cases such as suspicion of illegal kebab production, falsification of labels and/or invoices; and grey market (4%), for example placing on the market of kebab meat rolls by a company without official approval to manufacture meat preparations. Lastly, in 1 notification, mislabelling issues (1%) were identified.

### 3.5.3. Fishery products

During 2023, 777 cases (541 RASFF, 204 AAC and 32 FF notifications) were created involving fish, cephalopods, crustaceans and bivalve molluscs (and related products). In this context, the total number of notifications received in 2023 increased by 22.5% in comparison with 2022. The top notifying countries were Spain (23%), Italy (19%), Germany (13%), Belgium (7.3%), and the Netherlands (6.9%).

The origin of the products reported are Spain (13.1%), France (10%), the Netherlands (7.6%), Ecuador (6.9%) and Italy (5.3%).

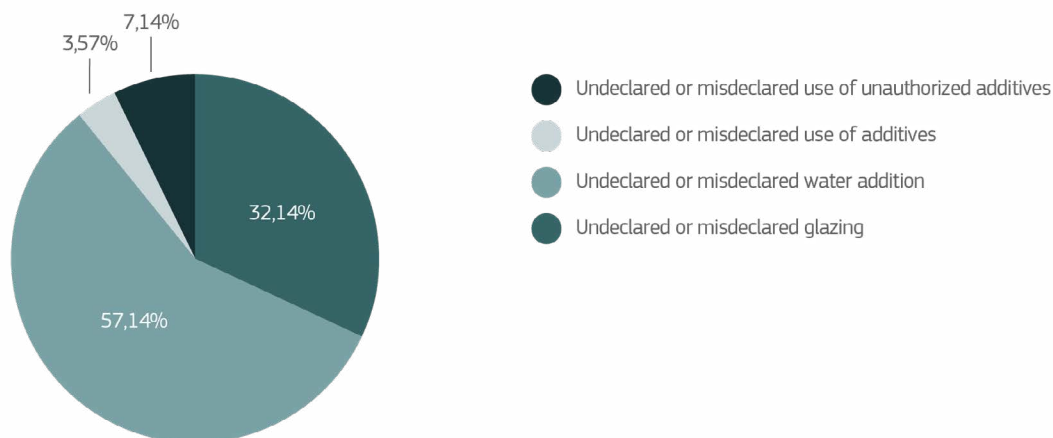
As part of a weekly screening of cases, 144 out of the total of notifications of this section were highlighted as a suspicion of fraud. 52.7% of the cases were related to adulteration/product tampering, such as the unauthorised use of additives in a product that ultimately alters the appearance or qualities of the product. 27% concerned grey market, including suspicion of counterfeit illegal trade and/or unauthorised operators. 14.6% presented mislabelling issues concerning mainly undeclared additives and preservatives on the label. Lastly, 5.6% were classified as document forgery dealing with lack or incorrect traceability and trade documentation.

During 2023, in reaction to a growing concern among the member countries, the EC initiated the planning of an EU Coordinated Action Plan on short weighting of fishery products. Short-weighting occurs when there is a misrepresentation of the weight of a fishery product by including any extra weight gained through various practices to the net weight of the product.

The action will focus on fraud practices such as the use of undeclared glazing, water addition, additives, and breeding. From 2019, 239 potential fraud practices have been reported in a total of 196 notifications. More than half of notifications involved water addition involving undeclared water addition in the product.

32% of notifications represented undeclared glazing, in which a product's weight is given together with the glaze, misleading the consumer. Some notifications (7%) involved the unauthorised use of additives such as carbonates and 4% concerned the lack of labelling of authorised additives. The categories specified in the **Figure 18** represent these various fraudulent practices.

**Figure 18: AAC and RASFF notifications with a suspicion of fraud by product categories**



### 3.6. Plant Health Network

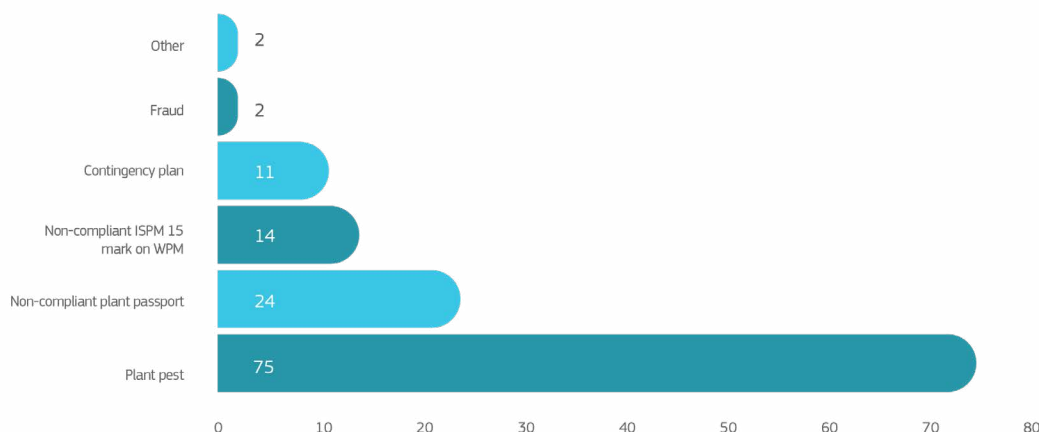
In 2023, the number of Plant health notifications exchanged reached a total of 128. 20 PH Network member countries created notifications, with Belgium and Spain creating the highest number (19), followed by France (18) and the Czech Republic (13).

The most reported notification bases on official controls on the market with 56 notifications, on official controls in operator's premises with 42 notifications and followed by surveillance programmes and monitoring samples with 5 notifications.

Among the 128 notifications, 113 were generated to report non-compliances, while 11 addressed issues regarding contingency plans, leaving 4 for cases related to suspected fraud and other matters.

Regarding non-compliance notifications, 75 were created to notify the presence of a regulated plant pest in consignments. Pests can include insects, viruses, nematodes, fungi and bacteria. They can cause various damages, such as decreased crop yields, necrosis, rotting or death of plants. 24 notifications were reported for non-compliant plant passports (certifying the content of the consignment and providing information about the operator issuing the passport, the traceability code and the country of origin). Additionally, 14 notifications reported missing ISPM (International Standards for Phytosanitary Measures) marks on wood packaging material (wood that surrounds and secures certain products during transport). Wood packaging material from non-EU countries and Portugal must bear a specific mark for entry and circulation within the EU common market, indicating the dedicated symbol of “ISPM 15”, the country code, the treatment provider code, and the treatment code applied.

**Figure 19: Number of notifications per type of issue reported**



Regarding the origin of the products, 102 notifications report products originating from within the EU, with 20 presenting the Netherlands as origin, 19 for Italy followed by Spain with 18 notifications. 15 notifications involved goods originating from outside the EU. The top reported product was **pine wood** (*Pinus sp.*) with 21 notifications, of which 14 are for wood packaging material missing the “ISPM 15” marks, 6 for the finding of a plant pest and 1 for a missing plant passport. 12 notifications were created for potatoes (*Solanum tuberosum*), with 11 for tubers of ware potatoes and 1 notification for soil with waste of potatoes.

Additionally, 11 notifications were reported for tomatoes (*Solanum lycopersicum*), seeds, plants, leaves and fruits, followed by fig plants (*Ficus carica*) with 9 notifications. Given the wide range of plant species and the relatively low number of notifications, many of commodities were only reported in one or two notifications over the year.

## COMMODITY GROUPS

Concerning groups of commodities, the highest reported in 2023 were **Ficus plants** and **Citrus plants**. Notifications for **Ficus plants** (*Ficus spp. respectively F. microcarpa, F. carica, F. elastica and F. macrocarpa*) accounted for 16 notifications, all for plants for planting. Notifications for the Citrus group (*Citrus spp. respectively C. limon, C. sinensis, C. margarita, C. reticulata, C. clementina and C. meyerii*) accounted for 11 notifications, 10 for plants for planting and 1 for citrus fruits.

Regarding the product categories, **plants for planting** were the most notified with 72 notifications, followed by **dunnage wood** with 13 notifications.

As shown in Figure 20, the top 5 plant pests were the following:

- **Tomato brown rugose fruit virus**, found in 12 notifications, 11 for tomato seeds, plants, leaves or fruits (*Solanum lycopersicum*) and 1 for pepper seeds (*Capsicum annuum*).
- **Citrus tristeza virus**, 9 notifications created, found in citrus plants for planting (*Citrus limon*, *Citrus sinensis*, *Citrus margarita*, *Citrus reticulata*, and *Citrus clementina*).
- **Fig mosaic virus**, 9 notifications reported, found in fig plants for planting (*Ficus carica*).
- **Meloidogyne enterolobii**, 6 notifications created, found in Chinese banyan plants for planting (*Ficus microcarpa* and *Ficus macrocarpa*).
- **Ripersiella hibisci**, 5 notifications, found in mixed consignments of plants for planting, of *Callistemon sp.*, *Washingtonia sp.*, *Phoenix sp.*, *Ficus benjamina*, *Ravenala sp.*, *Chamaerops sp.*, *Strelitzia augusta*, *Kentia sp.*, *Bamboe sp.* and *Trachycarpus fortunei*.

Figure 20: Number notifications per type of plant pests

