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Rural criminal collaborations and the food crimes of the countryside: Realist social relations theory of illicit venison production

Abstract

This article provides the first comprehensive criminological account of routinised illicit venison production in rural England. In doing so an epistemological reformulation and conceptual clarification of the overlooked problem is advanced, using extended fieldwork and a novel theoretical framework. The account of offending is refined to a type of illicit rural food enterprise supply chain misconduct, actualised by un-regulated industry processes. This kind of food crime is shown to be reliant upon suspects' connectivity with small to medium food business operations and the routines of rural occupations. Such relations with licit rural-centric commerce are the necessary conditions of offending, which are enabled by the contingent conditions of sub-optimal game meat traceability systems and an absence of regulatory oversight at critical junctures. An outcome that is structurally inscribed into legislation and induces non-compliance. The article addresses the current lacuna of research on venison meat food crimes in the British context and advances an innovative realist social relations theory to explain the crime commissioning process.

Key Words: Food crime, mundane fauna crimes, illegal taking of deer, illicit venison production, rural enterprise misconduct, critical realism, realist social relations theory

Introduction

This article advances the proposition that the venison food supply chain crimes of the countryside can be conceptualised as *the enterprise misconduct of the personnel*. This is posited through a novel framework that merges the concept of enterprise and routine activity theory with a realist social relations ontology (Edwards and Levi, 2008; Lord et al, 2017b&c). The approach enables the continuum of relations between legitimate industry operatives and rural stewards to be foregrounded, while incorporating the distal configurations that incentivise malpractice and constrain effective regulation. This model of realist analysis identifies causal mechanisms and contributes to the critical aetiological tradition of criminology (Sayer, 2000; Edwards and Hughes, 2005; Edwards, 2016). The principal distal mechanism and contingent condition identified by the research is defective legislation that coordinates inspectorate oversight at pivotal moments in the crime commissioning process – when and how deer carcasses enter meat supply chains at Approved Game Handling Establishments (AGHE) or game wholesalers. This materialises when substandard policy dictates the replacement of competent oversight in the form of local Environmental Health officers, for the incapable and often absent, or captured, guardianship of centralised Food Standards Agency staff. A deficit of systematic product traceability is also apparent throughout the various stages of the supply chain. Key deviancy promoters are thus structurally inscribed into the functionality of the otherwise legitimate process.

Elucidating these criminogenic dynamics is necessary because it can be argued that the food crimes of rural England have been overlooked and chaotically described when contrasted with the signal crimes impacting more regularly consumed foodstuffs (De Rosa and Trabalzi, 2016; Lord et al, 2017a; b & c; Wielogorska et al, 2018). The food hygiene breaches at the Russel Hume and Two Sisters meat processing plant

generated much attention in policy and press circles (Elliott, 2014; Levitt; 2016; Goodley, 2018; Monaghan, 2018). At the same time, the production of research on illegal trade involving high value megafauna and other spectacular species preoccupies much of the traditional green crime academy, which food crime is traditionally situated in (Moreto and Clarke, 2013; South and Brisman, 2018). In comparison, the subtler forms of rural based food and environmental commerce malpractice have been under-researched and inadequately accounted for – out of sight, out of mind. This paper fills the vacuum with an exploratory case study on the food crimes of the countryside and the rural meat industry collaborators who accomplish them. It is the first academic study to comprehensively incorporate in-depth empirical data and theorisation of venison food crimes in the British context.

The findings and theorisation of the article are significant for the following reasons: the red deer being routinely illegally harvested by deviant countryside custodians are, according to experts interviewed, being driven towards micro-extinction level events in a geographically bounded region of the country. It is even more significant given that according to said experts, the deer are the largest and healthiest specimens of the country's largest (and arguably most iconic) wild animal, and these animals are having their natural reproductive capacities constrained by this criminality. They are lawfully hunted during daylight and illegally taken at night, thus having no time to rest and recuperate. These stresses and the adrenaline created while remaining constantly alert can contribute to downward health spirals of herds and impact the future of the species where the research took place. Of anthropogenic consequence, there is a severe threat to public health, should inexpertly and unhygienically handled meats be consumed – a problem that has now regrettably stricken the companion animal food industry, for which wild venison is regarded as a core primary product in 'gourmet' varieties of pet

food (Halloran et al, 2019; Lay, 2020). Deer are shot and taken at night when signs of TB are less perceptible and dragged through or left in tainted surface water. An array of untrained rogues and deviant industry personnel are alleged to be plundering deer to satisfy supply chain demands and gain lucrative payments per-carcass. Towards advancing the literature, this work is an application of a novel social science aetiological apparatus through which unfolds a revelatory case of empirical phenomena yet to be explored adequately in criminology. Finally, this article contributes to extending the ontology of what constitutes the victim in rural, food and green criminology; from anthropogenic to biocentric and from megafauna to mundane fauna (White, 2008; ***, 2020).

Contentless abstractions of existing literature and small to medium business enterprise

Statements from notable legitimate game meat wholesalers show that just one operator can handle 200 deer carcasses in a normal week (Wall, 2021). The provenance of the deer and the authenticity of the credentials (and activities) of the potentially multiple stakeholders who have contributed to the carcasses transit in a food supply chain is unverifiable, due to the reasons identified in this article. The Food Standards Agency contend that licit industry actors acting dishonestly could be a central element of the venison crime process: *'[t]his could also be an ancillary activity by individuals involved in legitimate business, who use their connections and knowledge for dishonest financial gain'* (FSA, 2016: 46). No comprehensive literature existed in relation to the venison food crimes of the British rural frontier prior to the research for this article (***, 2019; ***, 2020; ***, 2021). Prior empirical research conducted on this topic found that respondents were not forthcoming in the data collection process and crucial details were unobtainable via the methodology of that research; only six of the 'thousands of members

of BASC' (the British Association of Shooting and Conservation) responded to a survey placed in the association's magazine (Wyatt, 2016: 192). Meanwhile roughly half of police forces responded which is problematised further due to wildlife crimes being non-notifiable offences and persistently deprioritised by police managers when perceived as victimless crimes in contrast to anthropocentric signal threats. While other important findings were obtained by Wyatt which cohere with the current article, a key observation was that there is: *'[n]o clear evidence of what route this [deer carcass] takes, anecdotal evidence of meat being supplied via the back door to restaurants and pubs but no firm evidence to support this'* (Wyatt, 2016: 197). It can thus be argued that this article is critical for the advancement of the literature on this type of overlooked mundane fauna crime.

It can also be argued that Wyatt's chosen analytical framework is populated by contentless abstractions that fail to grasp central aspects that characterise the gravity of this problem (Sayer, 1998; 2010: 67). On (contentless) abstractions, Sayer submits; *'[a]bstractions should distinguish incidental from essential characteristics. They should neither divide the indivisible nor lump together the divisible and the heterogeneous'* (Sayer, 2010: 60). Deploying the capacious terms 'organised crime' and 'poaching', rather than determining whether other, disaggregated or more coherent and concise concepts are more appropriate, is of detriment to an accurate elucidation of distinct offending processes situated in specific contexts (Edwards and Hughes, 2005; ***, 2020). This ontological treatise is necessary because the BASC members that Wyatt enrolled to participate in research as an expert knowledge base on poaching crimes, according to the accounts of regulatory experts revealed below and in keeping with the cited enterprise crime literature and FSA statement, are themselves potential suspects of offending, rather than constituting a reliable resource for understanding the problem and its reduction. Wyatt, following Nurse, acknowledges the potential for this very obstacle later in her article

(Nurse, 2011). Portraying complex events using relatively blunt and superficial terms, such as organised crime, corporate crime, black markets, and poaching can result in conclusions or recommendations that are incompatible with the problem and can mask the internal and external social relations or key dynamics of an offending process (Wyatt, 2016: 189, 196; Edwards, 2016: 980). For instance, rural stakeholders in the local meat production community can (and do) enrol the discourse of organised crime and poaching, at which time resource depleted police forces might train their focus on motorway surveillance for notable vehicle number plates, while the enterprising individuals populating this research are free to continue plundering deer from their farms or estates. Border forces, the National Crime Agency and Europol could then be enrolled, rather than (adequately funding and resourcing) Natural England, Trading Standards, and the Environment Agency. Organised crime is distinct from the normalised model of endogenous impropriety or rural crimes of convenience outlined in this article and is clearly distinguishable if we briefly look at some examples of high value megafauna derivative thefts and serious food supply chain criminality. Meanwhile the term itself is refuted by other theorists (Edwards and Levi, 2008: 373). According to investigative reports relating to the dynamics of the horsemeat scandal, '*[l]orries transporting horses have been used as cover for smuggling large quantities of cannabis between the UK and Northern Ireland and lorries transporting horsemeat to the continent are believed to be used for people smuggling on the return journey*' (Lawrence, 2013). Meanwhile the so-called Rathkeale Rovers gang diversified from other serious crime into the thefts of almost £60mil worth of rhino horn from British museums and auction houses to sell to counterparts in China, with the aim of profiting from the trade in traditional South East Asian pseudo medicines (Walker, 2016; BBC, 2016). The gang in question allegedly had multiple functionaries on the payroll within a hierarchically structured syndicate and even enlisted children into the crime commissioning processes, while '*[t]he four-year investigation was led by the*

National Crime Agency, supported by Europol and the Criminal Assets Bureau in Dublin (Walker, 2016). The perspective now being advanced coheres with other foundational work on food fraud dynamics, as this extended quote emphasises: *'[w]e argue that food fraud, rather than being an 'exogenous' phenomenon perpetrated by (transnational) organised crime groups and 'criminal gangs' seeking to permeate the food supply chain, is better understood as an 'endogenous' phenomenon within the food system where criminal opportunities arise under conducive/facilitative conditions as part of legitimate actors' routine behaviours* (Lord et al, 2017a: 3).

Previous literature on rural roguery and deviant countryside practices specifies how the context of rural business facilitates industry-based misconduct by creating a variety of opportunities for offending (Smith, 2004; McElwee et al, 2011; Smith et al, 2013; Somerville et al, 2015). Better understood as *enterprise crime*, authors argue that the concept rationally abstracts the essential characteristics of the crime commissioning processes internal to the unit of analysis and its contexts (Edwards and Gill, 2002; McElwee et al, 2011: 53-56; Croall, 2012; Lord et al., 2017a&c). This abstraction highlights how cottage industry can create the appearance of authenticity and legitimacy which in turn insulates offending processes from identification and intervention. Specialised processes that are of more interest to Environmental Health than Europol; an observation in keeping with foundational work on meat industry deviance (Hartung, 1950). It also specifies the crime event as a multifaceted continuum of business opportunities and collaborations that are enabled by diverse and unanticipated social structures, rather than just an organised crime group or poaching (***, 2021).

Earlier prominent proponents of enterprise crime theory forward a conceptual framework, which enables a delineation of the ontology of the professionalised offending model, one that is: *'directed at the regulation of interdependent licit and illicit markets'*

and when events become nuanced, slips between legitimate, grey and black-market enterprise' (Edwards and Gill, 2002: 211). This conceptual schema, which foregrounds a nuanced (i)licit continuum, also complements the existing literature on mundane rural crime in Britain. This frames the countryside caretaker or rural business operative not as the victim (e.g, Del Prado-Lu, 2018), but as a suspect (Smith, 2004; McElwee et al, 2011; Enticott, 2011; Nurse, 2011; Smith et al, 2013; Somerville et al, 2015). Edwards and Gill (2002: 204) argue that: *'in switching the focus of research from an exclusive preoccupation with the attributes of organised criminality to the relationships of exchange between "traders" in "dirty" or "grey" markets it is possible to identify a continuum of licit – illicit markets and corresponding interventions directed at their regulation'*. This more nuanced representation redirects thought away from tenuously linked green crimes and is also consistent with the assumptions of the Food Standards Agency, as stated above. Edwards and Gill contend that: *'(a) key challenge for developing our understanding of illicit enterprise is to pursue a more qualitative interpretation of the actual decision-making processes engaged in by illicit traders'* (Edwards and Gill, 2002: 218. It is to these considerations that will now be turned to.

Reconceptualising rural collaborations: Social relations theory

It is argued across the social and political sciences that a relational approach to explicating complex social entities is more fruitful than the neo-positivist and radical constructionist alternatives (Foster, 1999; Kurki, 2008; Lasslett, 2010; Kramer and Michalowski, 2012: 76-77; Jessop, 2016: 53-59). Identifying the interactions between specific agents within social arrangements or how ensembles of diverse context-dependent factors coalesce, and precipitate events is a subtler and more sophisticated mode of analysis than subsuming tenuously linked issues within recycled policy

constructs or capacious empirical classifications (Sayer, 2000; Edwards and Levi, 2008: 365; Sayer, 2010: 80-100). This move has significant implications for research and recommendations – managers, policy makers, unintended consequences, culture, history and legislation or legislators can be problematised, rather than simply cops, locks and crooks.

As such, distal, or remote contexts are understood as generative conditions that impact the necessary relations between suspects of crime in particular, *contingent* (secondary, additional, neither essential nor impossible) ways, and accelerate or constrain the causal potentialities of agents and other elements of a structural mechanism, according to other conditions present in a conjuncture or wider social setting (Jessop, 2005; Sayer, 2010: 62-74). This ontology retains the proximal elements that rational choice and other empiricist epistemologies are preoccupied with, but also avoids reductive analysis by designating an array of other mechanisms as co-conditioning of the entity of interest.

Therefore, it can be argued that it is the social relations between entities, such as rogue gamekeeper, licit trader and illicit haulage contractor or conspiring meat vender, and their wider interrelations with colluding business partners or unwitting innocent partners, shared working ideologies, local market incentives, policies and incapacitated inspectorate oversight, and of course the suitable targets of plentiful deer themselves, that hold purchase in a comprehensive account of offending, when considered among other influences. This makes the social relations enterprise model particularly compatible with routine activity theory (Cohen and Felson, 1979; Edwards and Levi, 2008: 379; Lord et al, 2017c). The crime triangle combination of motivated offender, suitable target and absent guardian of that traditional criminological theory provides a prefabricated relational mechanism. When integrated with routine activity theory, the

social relations ontology supplements the traditionally parsimonious explanatory capabilities of the former classical approach (Edwards and Levi, 2008: 378). It enhances the dimensions that our accounts are able to elucidate by abstracting the distal contexts that offenders are enabled by, and capable guardianship is constrained through (Edwards, 2016: 993). However, those routines are not wholly of the suspects own making; deer are of course natural phenomena and therefore commensurate with a realist appraisal, and those routines relate to occupational positions of enterprise and other unanticipated outcomes. This is one of the key advances that this article is forwarding in the model of a distal-centric crime analysis; these wider macro conditions matter and indeed co-determine, compound or counter, other pieces of the puzzle (***, 2021). The critical realist ontological perspective being adopted contends: *'that by 'conditions', we simply mean other objects, these having their own causal powers and liabilities'* (Sayer, 2010: 73). The conditions under which objects coincide and are articulated, such as the structured relations of the multiple continuums between licit and illicit networks and grey market traders, or the routine activity enterprise crime triangle, activate or constrain a structure's causal powers. Therefore, explaining deviance and misconduct as an emergent tendency of a context dependent balance of forces and factors avoids over-determining outcomes with sweeping generalisations and reductive mischaracterisations of contentless abstractions. More opportunities to specify precise causal relations become exposed when framing the object as a complex relation with multiple points of interconnection, as do tailoring targeted solutions to problems.

Methodology

To advance a versatile answer to the question of what the interlinked organisational characteristics of illicit venison supply chains are, the research strategy

deployed to conduct data collection and analysis was based around an intensive model (Hare, 1979; Sayer, 2000; Edwards and Levi, 2008: 365-368 & 375). This approach is commensurate with a commitment to an integrated realist social relations routine activity enterprise theory that incorporates precise isomorphic and sequential details of a crime commissioning process and remote conditioning forces. Sayer (2010: 163) suggests; *'In intensive research the primary questions concern how some causal process works out in a particular case or limited number of cases. Extensive research, which is more common, is concerned with discovering some of the common properties and general patterns'*. Edwards and Levi contend intensive models direct focus toward *'substantial relations of connection, both necessary and contingent, involving causal actors'* (Edwards and Levi, 2008: 368). The intensive strategy and causal powers aetiological explication is important to capture the minutia of organisational characteristics of the crime script sequence, the licit – illicit continuum and to posit the problem as a unity of diverse relations and conditions that is not determined by one over-arching variable, situation or event - the necessary relations of rural and meat insiders and their contingent relationship to conditioning contexts, can be foregrounded (Edwards and Gill, 2002; Edwards and Levi, 2008; Croall, 2012; Lord et al., 2017a&c).

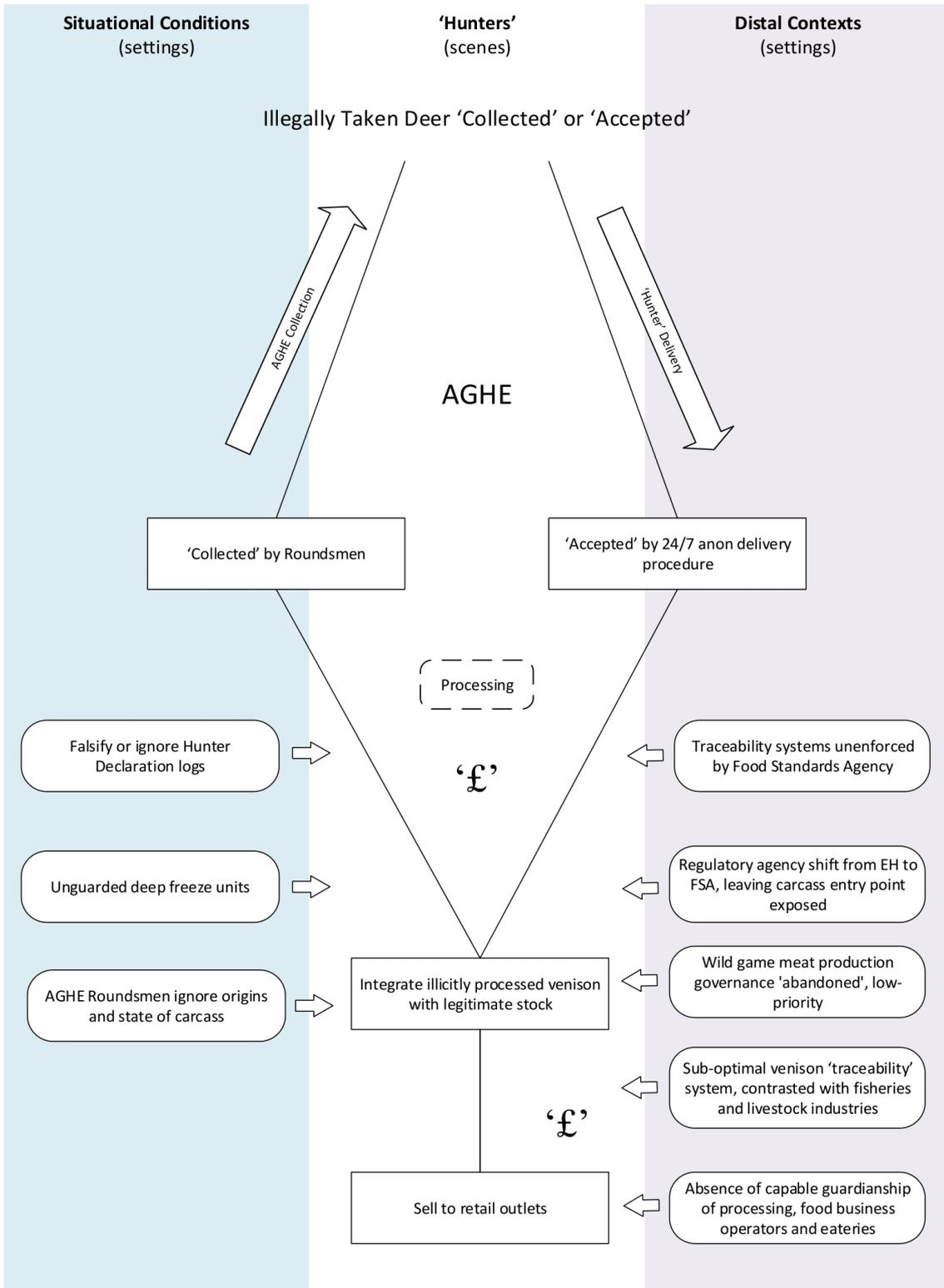
Research was conducted between 2015-2019, while data collection was mostly concentrated during 2017 and 2018. Semi-structure interviews were accomplished with amicable senior level experts working in the fields of rural, animal and food crimes. Many repeat interviews were conducted, as were trips out into the field for participant observation experiences. I attended the daily rounds of a meat premises Environmental Health inspector visiting local registered deer hunters, to check their records and discuss their current practices. Round-table events were arranged to validate my findings, one year after initial interviews, at which time my findings were discussed. The probe

sampling model was adopted, which relies on the uniformity of a relatively small quantity of very well-informed respondents (Collins and Evans, 2017). This sampling procedure coheres with the intensive strategy focus and was complemented by my own lived experiences of the rural West Country. I was born, raised and have returned to work in the West Country, while my father worked in a rural profession there as well. To begin the probe, I initially exhausted online searches for available press materials on crimes against wild fauna in Britain and contacted the experts who were interviewed by those media sources. Experts were exceptionally helpful, all responded, and none refused to be interviewed. Respondents were gracious and forthcoming with rich depictions of what the problem is, how it might be emerging, who are the key players, what is accelerating or frustrating it, and how we might respond to it. I progressed to more respondents until saturation was reached in relation to expertise of the South West: when experts that I had already interviewed were being referred back to me.

36 interviews in total were conducted with senior specialists from regulatory agencies, inspectorates and police forces. I interviewed expert representatives such as chief investigators, senior inspectors, assessors and officers from agencies and organisations constituting key stakeholders. As such, this expertise represented all institutional stakeholders of relevance to the case who I could locate over a one-year preliminary exploration of existing data. Civil society community group stakeholders were not included, so the findings would represent formalised institutional expertise on crime emergence and reduction. Interviews ranged between 30 minutes and 3 hours 30 minutes and took place in offices, police stations, homes, deer larders, muddy Land Rovers and food premises. Interviews were later transcribed, and significant data was thematically coded. Data is representative of the interpretations of the experts interviewed.

Data was analysed in line with Adaptive Theory, oscillating between data and (existing) theorisation, to form concepts in a constant iterative motion. Layder's adaptive approach ensured that the work was not confined simply to empirical observations associated with alternative models, such as Grounded Theory (Layder, 1998). Adaptive Theory thus aided the accurate explications of the causal mechanisms emergent from the data derived from a specific geo-historical context (Layder, 1998; Edwards and Hughes, 2005). Ethical approval was granted by my institution and consent was obtained from all respondents featured in the research. All of the offending monikers stated in quotes are pseudonyms derived from fiction.

VENISON FOOD CRIME SCRIPT



Venison food crime script diagrammatic representation.

Rural food enterprise crime continuums: internal structure of the unit of analysis

The necessary conditions for the emergence of the type of food crime considered here is that offenders earn their living through legitimate rural occupations or commercial meat vending (***, 2021). Offending is reliant upon multiple industry relationships and collaborative processes, which in turn is an *ancillary tendency* of the occupational routines of rural or meat enterprise personnel (McElwee et al, 2011; Smith et al, 2013; Somerville et al, 2015; Lord et al, 2017a). The illicit processing of venison can be better understood as the routinised misconduct of nominal rural stewards or malpractice of conspiring countryside custodians, which exists precariously in the zones of white and grey markets or ebbing and flowing along the fringes of (il)legality. The following quote from a deer specialist and vet who has lived in the region for 30 years illustrates this proposition:

'We know who is operating under these kinds of conditions; they're farmers sons, they're local butchers. And these people are generally not rural criminals. They're not thieves, they don't steal quad-bikes, they're just out for the deer'.

(Deer surgeon, expert police witness and specialist local livestock vet).

This central finding was confirmed by a local police officer with experience of responding to venison processing crimes while leading a multi-agency anti-poaching operation in the South West:

'Our fellow in [place name], I can't remember if his family did farming as well, but he certainly had, for like 60 odd years and his son was also involved in it as well, so it kind of passes down through the generations. And he was a qualified licensed butcher'.

(Police Officer, South West Illegal Meats Group).

This finding was again echoed by other senior local experts:

'The other lads could be people who are living and working locally, they've got a little bit of shooting [permissions from land owners]... they could be gamekeepers who are out foxing, don't repeat that to anyone' [laughs]

(Anonymous expert, the West Country).

'If you're able to access those two social-media [countryside shooting] groups that I mentioned, more often than not there is, 'oh I went out on a new permission [rights to shoot legally on land] tonight, on the pretence of shooting foxes, and then oh look, two Roebuck [deer] happen to come out just before dark'.

(Professional deer stalker, Deer Society Stalker Level One Accessor).

Researcher: *'So do local outlets such as the butchers in [...] have 'poachers' on hand, like hired guns?*

Expert: Yes, it's completely brazen, because all over his shop window it says 'Wild venison'

Researcher: Who is this?

Expert: [name]

Researcher: So he's a butcher as well?! [as a suspect']

Expert: Yeah he's a butcher and his old man was exactly the same. Environmental health has been in and done them dozens of times, they've had raids and all sorts of things, but never really come out with anything concrete enough to do anything.

(National Trust Head Deer Warden and Anti-Poaching Patrol Agent).

The type of offending revealed through these respondent accounts exhibits the primary quality of rural industries personnel who are committing offences during the course of their occupations and using acquired expertise to accomplish crimes. A necessary instrumental relationship between licit and illicit rural food enterprises is thus identified: they instrumentally supplement legitimate business practices and do not display identifiable characteristics of acquisitive or violent rural criminals, as the following two local experts, introduced earlier, outline.

'Well hypothetically, say if you had an outlet for the meat, so you're the end seller and you had a shop front, shall we say, and you didn't live a million miles away from the moor, and venison was making good money and you were that way inclined so you enjoyed it anyway...

And then you've got these other lads who have been butchers and country lads all their life, and they're out shooting deer just for profit and then you've got other lads who have an obsession with guns and shooting and see it as a way of topping up their income.

(National Park Head Ranger).

'The [place name] syndicate, if we call them that, the [location] gang are not into other rural crime, they're not badger baiting, they're not gambling, they're not heavy drinkers, they're not thieves, it's very much deer only. They're obsessed with shooting deer, there's a kind of sporting obsession with shooting deer at night.

They're not drinking at the pub and then going out afterwards, they're doing it seriously, between midnight and three in the morning. The major driver really is, this is an easy way to make money.'

(Deer welfare expert and vet).

The suspects being discussed do not steal from rural dwellings, they do not take farm machinery, nor rustle sheep. Neither do they commit hare coursing crimes that involve trespassing on fields and ransacking property. They do not commit these crimes, because they would essentially be stealing from themselves and those crimes are not *ancillary* to their routine, profit driven business activities; the nature of their rural enterprises does not provide a supply chain to dispose of farm machinery elsewhere, but it does enable the unscrupulous filtration of deer carcasses into an un(der)-regulated

supply chain for instrumental purposes. The following expert highlights the appeal of this type of enterprise offending:

'Now if you're a businessman and you've got a product, are you going to pay for one that looks the same and tastes the same, but is cheaper than the other? It's cheaper because it hasn't gone through the right processes.

(Wildlife Crime Police Officer).

In light of these substantial relations and their necessary relationship with licit commerce, as discussed above, the model of offending being revealed can be more accurately understood as a rural food enterprise crime (Edwards and Gill, 2002; Lord et al, 2017a&c). Edwards reminds us of the strength of the enterprise concept by arguing that, *'(i)t accommodates looser partnerships of co-offenders and consequently acknowledges the phenomenon of project crimes arranged by networks of illicit entrepreneurs'* (Edwards, 2016: 981). It is those loose partnerships and co-offending, or rural criminal collaborations that will now be discussed.

From gate to plate: entering legitimate food supply chains dishonestly

Once deer are illegally dispatched at night and taken from the wild during official rural occupational duties, such as shooting foxes or destroying other fauna regarded as pests by rural commerce, it enters the venison food supply chain process by one of two ways: owners of end supply sites, such as food business retail premises in the form of butchers, are able to utilise the services of complicit illegal chopping facilities. These

specialists provide the services of skinning and gralloching of a deer carcass, which then renders it physically suitable and lawful under food hygiene regulations to enter a butcher's premises for final preparations to sell to the consumer.

Illegal chopping rooms are informalized sites that do not comply with regulatory animal care and food hygiene standards (FSA, 2016). They were exposed by experts on more than one occasion during fieldwork, as was regulatory non-compliance with food processing standards. While some prolific suspects are known to utilise the facilities of illicit rural chopping sites to gralloch the deer before moving them to premises for butchery and final sale to consumers, the standardised mode for illegally taken deer to enter venison food supply chains is designated by senior level practitioners as systematic. These offences are structured by suspects' relationship to rural employment and non-ownership of, and therefore lack of direct access to, meat retail outlets. Rather than being food business retail operators (such as butchers or restaurateurs), this model of suspect can be classified as rural workers, game meat processing personnel and those employed in countryside occupations. Countryside stewards, such as rogue gamekeepers, deviant deer stalkers and complicit landowners are reported by experts to collaborate with employees of meat wholesale distributors to obtain profit from professional malpractice. While some operatives are known to episodically interact directly with unscrupulous retail operators themselves, this opportunistic and non-formalised approach is purportedly less frequent, due to the challenges (faced by a chef or kitchen staff) relating to skinning and gralloching a deer carcass on site and the very real potential of contaminated meats creating a public health catastrophe, should tainted or mishandled produce be served to the final consumer. The quantities of deer entering food supply chains via Approved Game Handling Establishments were reported

to be of far higher frequency and more criminogenic than that of the backdoor chicanery of the odd rural eatery accepting 'poached' carcasses.

Meat wholesalers that process deer carcasses into food produce for distribution to end-site outlets are known as Approved Game Handling Establishments (AGHE's) (FSA, 2015). They are the game and deer equivalent of abattoirs in the livestock processing industry. Industrial methods are used to process and prepare meats at these establishments and a Food Standards Agency (FSA) vet is required to be on site during delivery of stock, due to the volume of carcasses that can be processed. The vets are responsible for overseeing the process, such as assessing the physical state of the carcasses and checking for signs of Bovine TB and other potential contaminants that are liable to make the meat unfit for human consumption. This form of capable guardianship has no real capacity to ascertain whether meat has been lawfully hunted, poached, or illegally taken. The vets are also only present at AGHEs at irregular intervals, during pre-arranged carcass delivery occasions and therefore clearly fail to meet criteria of heightening risks and lowering rewards.

To supply meat to an AGHE, one must have a hunter's licence, thus becoming a 'trained person'. To become a 'trained person' and receive a hunter number, an operative is required to obtain a Deer Stalking Certificate Level One (DSC1). The hunter's identification number will then accompany carcasses onward into the supply chain, as a 'hunter's declaration tag'. This is the formalised best practice, if legitimate processes are adhered to when filtering shot deer into the production process and constitute a 'traceability system' for venison meat production. When contrasted with the robust seafood and livestock traceability systems, field experts disparage the model as less than a lip service to an auditing system, due to their failure at cataloguing the origins and route the meat has taken, from gate to plate; from the field to the consumer (Lewis and

Boyle, 2017; Aharwal, 2019). Many of the expert respondents interviewed expressed incredulity at the vulnerability of the supply chain process to misconduct. The hunters declaration tag is a piece of paper stapled to a carcass, smaller than an ordinary greetings card, hard to read and easily blemished. It is also simple to counterfeit with fraudulent details. The procedure, which unlike the more thorough livestock and marine traceability systems, has no electronic or digital counterpart and is highly vulnerable to duplicitousness (Hai, 2007). A trained person, registered with the local authority as a primary producer food business operator who has achieved the DSC1, is lawfully able to dispatch deer and supply it to the venison production industry with the hunter ID declaration tag attached to a carcass. The DSC1 hunter declarations are vulnerable to abuse in the form of the falsification of details, due to the absence of control mechanisms and crime preventers verifying their authenticity in the field and in the processing plant. The vulnerability created by a vacuum of oversight highlights the commissioning processes reliance on the goodwill of operatives and the expectation of their adherence to legitimate industry protocols. Rogue licence holders are able to exploit their qualification as a 'trained person' by attaching their ID tag onto *any carcass*, regardless of whether they lawfully dispatched the deer, illegally killed it, or obtained it from a counterpart. Once a tag is attached, the item is officially associated with that hunter and can then legally move into a venison dealership. Experts highlighted the deficiencies of such a traceability system:

'What documentation does he need? He just needs a tag, I didn't bring any with me. It's just a white.. You fill in where you shot the animal and that's it. That's no traceability, and nobody's doing anything with that information anyway.'

Traceability is just so poor, why aren't the FSA enforcing the AGHE to make sure all those hunters are registered with the local authorities? That's easy...'

(Senior Environmental Health Intelligence Officer).

Researcher: *'And the AGHEs who are taking carcasses 'no questions asked', why aren't enforcement agencies asking them for the proper paperwork or else say they're breaching legislation?'*

Expert: *Well you ask them that! They've been to Chinaskis, which is the big game dealer near [...], Chinaskis at [...] and they've been there and asked to see their records, but even if they turn up and if somebody like, Smith Jones, if they turn up and he's got records for every 50 deer in there, they have no way of knowing if he's handled 150!*

If the carcasses are not there hanging in the chiller, then there's no way of knowing what's passed through his hands. And a lot of these people, certainly Jones and other game dealers, they have outlets where they can shoot the carcasses very quickly, within a day or two, they're not hanging them in a chiller for any length of time.

(Deer surgeon and animal welfare expert).

'There's another aspect to that financial side of unscrupulous methods, subletting and handshake agreements, you sometimes have unscrupulous sporting agents, who will legitimately have some call on the deer and they may have an agreement with a landowner to say I'll shoot five stags and hinds, or something, and that's

what they put on their returns, but actually they shoot 15 stags and 30 hinds. In the deer world, I bet you wouldn't have to look very far at all to find connections between legitimate stalkers and illegal activity'.

(British Deer Society).

Deer carcass supplier and venison distributor relations: countryside collaborations

Dishonest rural stewards interact with unscrupulous AGHE operators in two distinct ways to transfer illegal deer carcasses to an AGHE wholesaler. The most frequently featured of the AGHEs in the research was reported to operate a twenty-four-hour deep freeze drop-off system. An industrial deep freeze is left open and unmanaged in a rural location where carcasses can be deposited, anonymously, and at all hours. Those supplying carcasses via this process need only to attach their bank details to the product to receive payment per pound of meat. The AGHE is alleged by experts to breach traceability standards and apply their own 'in-house' declaration tags to the carcasses deposited overnight because of these acute deficits in regulatory oversight. Thus, the process is not only distorting the origins of the carcass, but also compelling deviant personnel to participate, as the following expert reveals:

Expert: 'And the other thing you need to look at, there's a game dealer down in [...] and out of hours these lads don't even have to see anyone. Out of hours these lads can just turn up, fill out a ticket and then put this deer into a freezer and in it goes and the money just gets transferred into their bank account.'

Researcher: So it's completely anonymous?

Expert: Well they have the bank account number, so there's a bit of traceability there, so if anyone comes to you, you can say 'oh yeah I've got 20 acres, I shot the deer on there and that was that', they can bring it in anytime day or night. If people haven't got to see other people, it almost makes it easier for them.

(National Park Head Ranger).

Expert: 'Places like Chinaskis you can just drop a deer off.

Researcher: it seems highly problematic that there's an over-night anonymous drop off point.

Expert: Exactly, all you have to do by the law is put a tag on it and in theory you're supposed to say where you shot the deer, but again hunters may not do that because they're fearful that other hunters will go in there and see the tag and..

Researcher: Take their patch?

Expert: Yeah exactly, their patch, and some of these people that go around collecting, I've heard that they'll just put tags on regardless. It's just a paper tag, it's easy to take off, isn't it.

(Senior Environmental Health Officer).

The alternative procedure in which food crime suspects transfer meat in primary product form to colluding wholesaler distributors is known as a 'roundsman' system. This system is an industry custom in which a refrigerated vehicle such as a van or lorry collects carcasses from shooters to deliver back to the dealership. This approach sees roundsman traverse known deer rich rural locales, liaising with hunters and effectively

harvesting as much produce as possible. The activity is a legitimate business practice, but once again, due to the notable absence of any proper model of governance, it is highly exposed to inducing fraudulent activity, as the following expert notes:

Expert: 'I know, it's been reported to me from a reliable source, that somebody will just turn up with a truck and a trailer, with a round, come into the South West, take game off hunters, which may be poached as well, cash in hand, pay for the carcass, in fur and take that back to the AGHE, approved game handling establishment, this is legit, again, the middle man can do that, and there it will enter the food chain, legit, so that's where the mark up is.'

'I'm not sure the Food Crime Unit is aware of the problem... I know who it is, this person collecting and where it's going.. he'll come down from sort of [...] area, shall we say, he'll come down via the M5, [place], skirt the area, [place] and then go back again. That's his round, collecting deer. Back to [...] area, that's going back to an AGHE. That's going to be a lot of meat. And [...], and maybe I suspect that's going to be going to the London market'.

(Senior Environmental Health Officer).

This business activity is lawful and will ostensibly be picking up legally hunted deer from industry professionals on the collection route. It was noted at the beginning of the article that one legitimate venison dealer was collecting and accepting 200 deer per week. However, the process is vulnerable to deception and fraud, because the concealment of illegally taken deer amongst legitimate articles is impossible to detect in the unguarded environments being revealed. Roundsman systems and AGHE delivery

points are accepted and lawful practice in the game meat industry. However, duplicitous specialists will accept deer in any physical state and apply their own professional accreditations to carcasses, which motivates offenders to illegally kill deer by creating opportunity or demand for deer. The AGHE will then process the carcass and integrate it with legitimate meats, thus concealing its origins, before sending it through the supply chain, in wholesale form to retail operators. This clandestine integration and concealment procedure exhibits the attributes of laundering. It occurs before the state of the bad meat can be determined by regulatory experts or before agents are even aware of the meat being transferred and the illicit activity by the legitimate business, as this expert reported:

'What is taking place is, there are people, the legislation allows them to collect game from hunters, no questions asked, cash in hand, and they will travel. I know, it's been reported to me from a reliable source that game is, somebody will just turn up with a truck and a trailer, with a round, come into the south west, take game off hunters, which may be poached as well, cash in hand, pay for the carcass, in fur and take that back to the AGHE, approved game handling establishment, this is legit, again, the middle man can do that, and there it will enter the food chain, legit, so that's where the mark up is. There's too much game being taken just to enter pubs, car boot sales, etc, that is where the majority of it is going.

(Senior Environmental Health Officer).

Contingent conditions for incapacitating inspectorate oversight

The food supply chain crimes discussed above are not analogous to using other produce, such as food items and packaging to conceal illegal substances or alternative contraband. The illicit produce is the same physical artefact as the legitimate stocks in this case, and both are amalgamated and interspersed with the other once illegally taken deer enters the food supply chain process. Such embedded deviance would render governance of the process particularly difficult if regulation were optimal and crime preventers in abundance. In the realm of regulating the venison processing industry, this is shown not to be the case. Once an AGHE or any commercial wholesaler with the facilities to mass process deer carcasses has concealed the origins of the deer and integrated it with lawful stock, it can be delivered to retail outlets. This expert reemphasises some of the problems ingrained into the structures of venison processing regulation:

'I think the problem is that the legislation is such, that the scenario that I outlined, can be legit, it is legit, but the guy doing the round or buying the deer off the hunters, again it's a grey area, it encourages that criminality, it's easy, it allows that person to poach a deer, or obtain a deer, shall we say, and pass it on easily and it's fine. This guy comes along with a trailer, picks it up and it disappears again, he gets cash in hand, it's easy money isn't it?'

(Senior Environmental Health Officer).

The most pronounced contingent conditions that inhibit optimal regulation are identified as emanating from overly complex and incoherently constructed legislation

that coordinates which agencies enforce what laws at precise stages of the process. Exceedingly sub-optimal policy construction has created needless obstacles, according to senior respondents; Environmental Health (EH) are responsible for enforcing compliance over primary producers: (dishonest) hunters in the field, rural workers with freshly dispatched deer hanging in the game larder. But when the gralloched carcass is passed onto the AGHE (the critical segment of the food crime being discussed), enforcement falls to the Food Standards Agency. That agency enforces statutory compliance over commercial game meat regulations, once amounts of venison increase to more than 'limited quantities' (FSA, 2016).

This was identified as a significant problem by experts, because the local EH are on personal terms with the primary producer hunters who they have built good working relationships with over time: a proximal factor amounting to the micro-management of potential suspects that tends to mitigate the likelihood of illicit activity, providing the phenomenon of regulatory accommodation is avoided (Edwards and Gill, 2002: 213). However, due to the existing legislation of wild game meat supply chain regulation, the local EH agents do not know where their registered hunters have supplied their carcasses to, because the FSA regulates the AGHE dealerships (FSA, 2015 & 2016). Likewise, the FSA agents are associated with the AGHE operators, due to providing oversight to those wholesale businesses, but are not privy to the upstream details of where the carcass originates from and how it was dispatched or under what conditions. Then, once the processed venison leaves the AGHE dealership and arrives at a retailer, such as a café, pub or restaurant, it falls to Trading Standards to ensure statutory compliance of a sellable foodstuff.

At a critical stage in the venison processing crime script and one that is significantly exposed to illicit activity – the transfer of *illegally taken deer into illicitly*

processed venison, misrepresented with falsified hunter's declarations, from hunter to AGHE meat processor (and finally to retailer) – the enforcement agency abruptly shifts, on multiple occasions. This entirely avoidable regulatory glitch derails the foundational supports in the governance of grey game enterprise activity by capable guardians and legislates their absence at a critical juncture. It has been noted by respondents as problematic on a number of fronts:

Expert: 'I was speaking to an AGHE yesterday and he's got 30 hunters supplying him, from Devon and the South West. We [EH officers] haven't got that [information], there's no requirement for him to give us those details, because we don't have that enforcement role.

And I'm pretty sure that the FSA don't know who those 30 hunters are that are supplying that AGHE with deer, and that's ridiculous, with regards to traceability.

Researcher: Because anyone could be initially supplying those hunters who are supplying the AGHE?

Expert: Exactly, there could be dogs, they could be poached... Again, with the Illegal Meat Group, we have worked with the FSA and said 'will you provide us with this information'?, but they haven't. A large amount of meat is entering the AGHE's as poached meat, and they need to put the controls in place.'

(Senior Environmental Health Officer).

Expert: 'In an ideal world what would happen is people like Chinaskis or Best Game would turn around to us and say 'here's our list of hunters, these are all the

people who are supplying me', because they have to have those in place, those records in place, traceability.

And then we should be able to trace back those hunters and say 'I understand you're supplying Chinaskis, are you aware you're supposed to be registered with us, because you're in our area, please can you fill out this form and I'll come and have a chat with you', and that's pretty much what it is. It's very informal.

So that would be the ideal, in getting information from the AGHE's, but they aren't very forthcoming with that information. So, the only reason I can think of is that they know, and I'm fairly certain that Chinaskis knows that they are taking poached game, absolutely certain of that. You can drop game off at Chinaskis any time of the day or night...

Now this is the problem, it's FSA enforced. Now if the FSA aren't willing to tackle that, what choice have we... We have no enforcement responsibility in this business.'

(Environmental Health Enforcement Officer).

The internal problem at this turn of the script is not an absence of police enforcement, but rather the incapacitation of local expert regulatory agents, due to the misallocation of regulators and statutory enforcement powers written into supply chain governance legislation. This analysis emphasises the strengths of the social relations model of elucidation, as multiple agents, agencies and legislative conditions interact and counteract one another, to co-determine the outcome of the crime commissioning process as a dynamic context-dependent tendency that can be altered.

AGHEs must have a vet present during deliveries of carcasses to inspect the body. The inspection vets are ultimately the FSA guardians being noted as 'absent' or incapacitated. As contended by the expert in the quote below, a further barrier to precision regulation of the process, is that a local rural problem is being governed by an agency that is based in London and not the local authority in Devon, with close proximity to and local knowledge of the offending site. The FSA vets working in AGHEs (and livestock abattoirs) are frequently working in hostile environments and far from home. It has been reported by multiple reputable investigative sources that foreign vets working in British meat industries endure relentless intimidation and harassment by the rural workers in slaughterhouses (Enticott, 2017; Davis and Walsey, 2017; Walsey, 2017). These tensions and inhospitable working conditions, which FSA vets must tolerate, create conditions un conducive to capable guardianship of the venison production process. Experts interviewed in this research highlight the incapability of the FSA guards to prevent the problems being discussed in venison processing plants:

'The AGHE I spoke to yesterday, he's fairly legit, he knows what's going on and I suspect he may allow a few 'grey ones' in, shall we say, because everybody else is doing so, it's accepted practice to do so. Like I said, the checks are non-existent, so it allows it. So unless those checks are tightened up, the FSA need to do something about it.

The problem is the AGHE's are not tasked with enforcement, it's the FSA who are responsible for the enforcement of those premises, but they've had resource cuts as well.

And when you've got some of those vets are coming from Ealing or somewhere, they've got an hour's journey, or more than that [over three], just to inspect a few carcasses hanging up. I went there yesterday, he had a few carcasses hanging up and a wild boar.

(Senior Environmental Health Officer).

This expert highlights the incapability of the FSA guards and the distal conditions created by the legislation of wild game meat production:

'But this is the problem, it's FSA enforced. Now, if the FSA aren't willing to tackle that, what choice do you have...? You know, we have no enforcement responsibility in this [AGHE] business. I'm looking into drafting a letter to Chinaskis to play hardball with them, saying that I demand this information under the Food Safety Act or the hygiene regs. But I don't know whether or not I can actually do that because it's not quite in my patch.'

(Environmental Health Officer).

The FSA vets working under the conditions referred to above, according to the respondents, are likely to check for signs of Bovine TB and other visible signs of diseases and then hastily move on. Therefore, it can be argued that the FSA officials responsible for enforcing meat regulations at AGHE sites are *incapable guardians*, due to their ineffectiveness at ensuring compliance with rudimentary traceability systems and reviewing declaration tags to register the lawful status of hunters in the prevention of

mundane fauna crimes. It should be noted that the FSA officials are for the most part incapacitated through structural pressures not of their own making. If the declaration tags are falsified and dishonestly applied, the FSA vet will have no formal verification procedure, because it is Environmental Health who holds the hunter's records. The FSA agent is unaware of the working practices and codes of conduct of the hunter delivering carcasses to the facility, in the model of the Environmental Health officers are who regularly visit them, so they cannot ascertain the genuine origins of the deer. Mirroring the issue, the EH officers do not have a list of hunters supplying the AGHE, so they are uninformed as to where their potentially unscrupulous hunters are sending the deer that they dispatch. It should also be recalled that FSA is the central food regulation agency and manage all food-related regulation, and to a certain extent have immiserated their enforcement capacities through outsourcing regulation to profit seeking private entities in conjunction with deregulation of industries in general (Tombs, 2015). The critical issue of the FSA sub-contracting this vital regulatory work to private companies such as Eville & Jones veterinary controls supplier and the myriad of complexities that are bound up with the privatization and hyper-deregulation of regulatory regimes was also prevalent in the emergence of the horse meat scandal (Lawrence, 2013; Fitzgibbon and Lea, 2020). As such, unlike the local EH officers, the FSA officials do not have specialist knowledge of individual game meat supply chain compliance practices and standards. There is regulatory breakdown inscribed into the legislation of the food production process at this pivotal segment of the process, which causes an enforcement vacuum; the EH are unaware of where the potentially illegally taken deer are being sent and the FSA inspectors at the dealerships are oblivious to where potentially illicit stock is arriving from.

Conclusion

This article has presented an exploratory case study of illicit venison processing to elucidate the hitherto unknown organisational characteristics of the game meat supply chain offences of rural England. The route that illegally taken deer traverses into illicit venison production processes has been revealed throughout the article. It has been contended that the food crime being discussed should be conceptualised as a form of isomorphic and routinised grey market illicit rural food enterprise activity, or the enterprise misconduct of venison processing personnel. Activities that are reliant on a variety of imbricated necessary and contingent relations traversing a nuanced licit – illicit continuum.

Lawful rural and food enterprise activities provide an authenticating cloak for concealing industry malpractice, which is *ancillary* to routine rural and meat occupational duties and relationships. Professionals afforded direct access to plentiful deer stocks and the means to profit from their sale as venison, through the course of their employment, can integrate illegally taken stock with lawfully hunted articles and ostensibly legitimise the process by recourse to their employment status as a nominal specialist. All of which is alleged to evade expert carcass inspection, product auditing, HMRC taxation and food inspectorate regulation. It is these necessary social relations that compel motivated offenders and produce incentives for the collaborative nature of the offending process to emerge. The issue dwarfs preconceived notions of rural black-markets and opportunist backdoor sales of poached deer. Adopting a framework that unified social relations, enterprise crime and routine activity theory, it was shown that key mechanisms of offending were enabled by an acute paucity of regulatory oversight or an absence of local expert regulation; a predicament that is structurally inscribed into the legislation of supply chain regulation and is therefore distal in its manifestation;

respondents constantly repeated the phrase, '*the legislation encourages it*'. Regulatory non-compliance is thus rife within this criminogenic context.

Not only has the article advanced a more accurate case study explication of a particular context-dependent rural food crime commissioning process, tending to emerge in the rural West Country, as a diverse unity of tendencies, it makes a contribution to knowledge on how to reduce rural criminal collaborations; rather than searching for spurious organised crime groups and poachers monopolising black markets, external to rural commerce, the problem is internal to, and emergent from, the material contexts, operational continuums, and various stakeholder relations discussed throughout. Effective responses should therefore be focused on legitimate rural and venison meat industry processes, collaborations, and legislation, if this food crime of the countryside is to be efficiently reduced.

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