

Mr Zafar Siddique
Senior Coroner, Black Country Area
Black Country Coroners Court
Jack Judge House
Halesowen St
Oldbury
West Midlands
B69 2AJ

30th November 2016

Dear Mr Siddique,

Report into the death of Ms Imama Shahid.

I am writing in response to a Regulation 28, Coroners (Investigations) Regulations 3013, Report to Prevent Further Deaths, dated the 31st October 2016. The report detailed your inquiry into the death of Ms Imama Shahid from an accidental overdose of dinitrophenol tablets.

The National Food Crime Unit (NFCU) continues to combat the marketing and sale of 2,4 dinitrophenol (DNP) and I am committing considerable resource to doing so on multiple fronts. Due to the dangers that DNP poses to the public I regard tackling its illegal sale as one of my highest priorities and will continue to do so. Whilst we have had considerable success in this area and there are some encouraging signs that our message on its dangers is getting through I am not complacent and will continue to direct resource at this issue.

Figures on cases of DNP toxicity in the UK have been compiled by the National Poisons Information Service (NPIS) up to April 2016. The NPIS is the UK Department of Health approved, and Public Health England commissioned, national service that provides expert advice on all aspects of acute and chronic poisoning. In the first quarter of 2016 four such cases of DNP poisoning were reported, with no fatal cases. This is in comparison to the whole of 2015 in which there were 35 cases reported with six fatalities. The NPIS data also shows a steady decline in TOXBASE¹ accesses and telephone enquiries to

¹ The database by which health practitioners find information on toxins



NPIS since the second quarter of 2015. This decline in TOXBASE accesses and reported cases corresponds with the FSA's campaign against the sale of DNP for human consumption which is detailed below.

The NFCU is aware of only one DNP fatality after April 2016.

FSA Activity

FSA Communications Campaign #dnpkills

This campaign initially ran on Twitter and Facebook from Friday 30 April to Tuesday 5 May 2015 resulting in an actual reach of over four million people, and achieving approximately 75,000 shares, retweets, favourites or links.

Additional support was received from Radio 1 DJ Danny Rampling and the band Primal Scream. The campaign was also supported by B-Eat, an eating disorder charity, which helped the message to reach those most at risk from DNP misuse. A short video was also produced and shared on social media with Georgina Collins speaking as the FSA representative.

The FSA has continued the #dnpkills campaign, most recently with the launch of pictorial cards warning the public of the dangers of DNP. Press releases have also been issued along with information on the FSA website.

Operation BROGUISH

Following a death in April 2015, the NFCU launched Operation BROGUISH which specifically targeted the illegal sale of DNP for human consumption. Having identified numerous overseas-based websites selling DNP for human consumption, the NFCU has an ongoing programme of submitting 'abuse complaints' to domain name registrars under international web usage agreements. At the end of October 2016, 30 abuse complaints have been submitted by the NFCU with 20 domain names suspended so far as a direct result.

The NFCU proactively engaged with Alibaba.com² which hosts multiple sellers of DNP, to highlight the presence of sellers providing DNP illegally for human consumption. The website administrators now regularly remove listings which offer DNP in food form.

As a result of this internet-based work, the NFCU identified an individual in the UK selling DNP via their website. Subsequent enquiries showed that the victim had purchased DNP from this site. Search warrants were executed on two premises in February 2016 with the assistance of local Borough Councils and the Metropolitan Police. This resulted in seizures of large quantities of DNP and materials used to create capsules for human consumption. This investigation continues with a view to

² A marketplace-styled website similar to ebay



prosecuting the suspect. Analysis of the suspect's seized IT equipment shows him selling DNP to an extensive and international client base.

Operation SYCAMORE

This operation relates to the NFCU's proactive, strategic work to address the availability of DNP in the UK.

A DNP briefing paper was produced by the NFCU to raise awareness of the issue, promote intelligence sharing and provide guidance on the legal framework for addressing issues with the sale for human consumption. This was well received by local authority partners; in one example a local authority took the initiative to raise awareness in their local community of the dangers of DNP consumption, providing press releases to local papers.

The briefing has also been shared with other law enforcement partners. Subsequent liaison with potential stakeholders has opened channels of communication and intelligence sharing with organisations such as UK Anti-Doping, Post Office Investigations and Royal Mail Investigations which will enhance the UK's response to any future DNP issues.

Contact with the 'Talk to Frank' website has led to their likely inclusion of information on DNP to warn their target audience of young people of the dangers.

Analysis of the evidence seized in the BROGUISH case revealed information on companies supplying DNP to the UK, and likely importation routes. This data was passed to Border Force and as a direct result an Operational Instruction was issued to all Border Force Officers, briefing them on DNP and requiring details of any seizures to be reported to the NFCU. During an initial scan Border Force found that there had been relatively few suspicious importations of DNP over the past six months, and we were able to identify those made by the BROGUISH suspect.

Operation ROSETTA

The NFCU's investigations into websites selling DNP revealed a particular website which used language and imagery suggesting that the administrator was based in the UK. Other language and imagery used suggested that the DNP was for human consumption, i.e. the sale of the product in capsules and text describing its fat-burning effects.

In September 2016 search warrants were executed on two domestic premises with the assistance of the local borough council, the Police Service of Northern Ireland and the FSA in Northern Ireland. A quantity of DNP was seized along with encapsulating equipment and IT equipment. One suspect was later interviewed under caution and inquiries continue to progress the matter to judicial proceedings.

Subsequent analysis of this IT equipment showed customer details and the NFCU wrote to the customers warning them of the dangers of DNP. A Post Office receipt found on the premises showed that one delivery had been made to a school which the NFCU contacted to warn of the dangers of DNP and safeguard the welfare of any pupil who may have ordered it. The headmaster established that the



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postcode used was one of residential properties on the school premises, making it unlikely that the DNP was sent to a pupil.

2016 victim

Inquiries continue into how and from where Ms Shahid purchased any consignments of DNP and we will take appropriate action to counter any further marketing or supply from this source.

The NFCU will continue to prioritise combatting DNP sales and where we can will take robust actions against persons selling it. Much of the market for DNP is sold via the internet which brings challenges to tackling it, especially as many of the websites are not hosted within the UK and those behind them are resident elsewhere. Nonetheless we are actively seeking out opportunities to make interventions including regular monitoring of the internet to identify those websites selling DNP.

Please do not hesitate to contact me if you require any further information.

Yours sincerely,

*Signed Gavan Wafer
electronically*

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National Food Crime Unit
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