

A coordinated operation to tackle the supply
of illicit tobacco in England

Operation Henry 2 “OH2”

Commissioned by the
Department of Health Tobacco
Policy Team & delivered by the
Chartered Trading Standards
Institute

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Summary and Key Findings

- Operation Henry 2, OH2, is the second large scale coordinated action by Trading Standards Services to tackle the local supply of illicit tobacco products across England, it follows the successful Operation Henry delivered in 2014
- The Operation was developed and managed by the Chartered Trading Standards Institute on behalf of the Department of Health. Tobacco detection dog search teams were provided by Wagtail UK Ltd
- Illicit tobacco products were available in every English region; in total approximately 2.9 million cigarettes and 1272 kg of illicit HRT have been removed from the market place during OH2
- 67 local authority Trading Standards Services took part in the operation with seizures occurring in 56 of those council areas
- Of the businesses where seizures were made ; 57% have had illicit tobacco seized from the premises previously (repeat offenders)
- The largest single seizure was over 1.3 million cheap white cigarettes and 551.45 kg illicit HRT removed from a self-store facility in Derbyshire
- The main brands of cheap white cigarettes seized were West , Winston , NZ Minsk and Fest ; this is a change from Operation Henry [2014] when Jin Ling was the most frequently seized cheap white cigarette
- The main brands of illicit HRT seized were Golden Virginia and Amber Leaf
- The total value of the seized tobacco products during OH2 was £919,045.68 this is £165,546 more than the value of tobacco seized during Operation Henry [2014] this is broken down as follows:
 - £399,303 from seizure of cheap white cigarettes
 - £157,278 from the seizure of genuine non UK duty paid cigarettes
 - £119,166 from the seizure of counterfeit cigarettes
 - £236,302 from illicit hand rolling tobacco
 - £6996 from other illicit tobacco products

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Corrigendum: It has come to the attention of the CTSI that Winston and West have been incorrectly coded in this report as illicit whites whereas the products should have been coded as counterfeit or non duty paid tobacco product as appropriate. CTSI apologises for this error and advises that the data should be interpreted accordingly.

20th June 2017

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1. Introduction

“Operation Henry 2 “ (OH2) was developed and managed by the Chartered Trading Standards Institute (CTSI) on behalf of the Department of Health Tobacco Policy Team (DH). It follows the success of Operation Henry¹ in 2014 when illicit tobacco to the value of £753,499 was seized by Trading Standards services across England and removed from the supply chain.

OH2 is one of a number of funded projects arising from the regulatory service contract between CTSI and DH designed to support and enhance local delivery of effective tobacco control activities.

2. Context

The composition of the tobacco tax gap is estimated at £2.1 billion, with the ‘tax gap’ being the difference between the amounts of tax that should be collected by HMRC, against what is actually collected. The gap relates to the illicit market in cigarettes and hand rolling tobacco, the size of which has changed over time. These changes are a reflection of the changes in the long-term illicit market share of cigarettes compared to that of hand rolling tobacco.

The share of the tax gap associated with hand-rolling tobacco was approximately one third in 2005-06, but is now nearly half of the tax gap in 2013-14. The long-term illicit market share of cigarettes is declining more rapidly than that of hand-rolling tobacco.²

In 2015, HMRC and Border Force published a new strategy “Tackling Illicit Tobacco from Leaf to Light “³

The new strategy sets out not only how HMRC and UK Border Force will continue to target, catch and punish those in the illicit tobacco trade, but also how an environment that is hostile to the fraud, will be created

There is a commitment to work closely with Trading Standards Services:

“We work closely with UK law enforcement agencies, such as Trading Standards, the police and licensing authorities, sharing and developing intelligence to support joint activity in the UK.”

There is an acknowledgement that tobacco smuggling seriously undermines legitimate business and is dominated by internationally organised criminal groups often involved in other crimes such as drug smuggling and people trafficking.

¹MacGregor J. (2014) Operation Henry Tackling the Supply of Illicit Tobacco in England 2014 Published by the Chartered Trading Standards Institute available on line <http://www.tradingstandards.uk/policy/Improvingthehealthofsociety.cfm> [accessed 24th April 2016]

² Measuring Tax Gaps 2015 edition available online

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/470540/HMRC-measuring-tax-gaps-2015-1.pdf [accessed 24th April 2016]

³ Tackling Illicit tobacco from Leaf to Light (2015) The HMRC and Border Force strategy to tackle illicit tobacco available online :

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418732/Tackling_illicit_tobacco_-_From_leaf_to_light_2015_.pdf [accessed 24th April 2016]

3. Scope

This report concerns the delivery and results of OH2 during the time period December 2015 to April 2016. The Operation has been delivered by Trading Standards Services (TSS) across nine English Regions.

4. Purpose

To build on the success of Operation Henry (2014) assisting TSS to tackle the supply of illicit tobacco locally. A number of search days with Wagtail UK Ltd have been funded for each Region to allocate as directed over a 5 months period. The time frame was selected to be different to that of Operation Henry (2014) which ran between April and November 2014. A wider range of premises have also been included within the scope of the operation, for example vehicles and self-store facilities. The data arising has been collated and the findings reported to the DH, HMRC and CTSI.

5. Method

In most respects OH2 has replicated the method employed during the first Operation Henry. Improvements were made to the booking process following the evaluation of the first operation. Essentially this was a collaboration between the DH CTSI, Wagtail UK Ltd the tobacco detection dog supplier, and the Regional coordinators of trading standards working with local Trading Standards Services.

Wagtail UK Ltd provided the detection dogs for the first Operation and thus their experience was considered invaluable for OH2. To facilitate communications with local trading standards, each region provided a single point of contact (SPOC) through which all communications regarding this Operation were channelled.

Each SPOC was advised of the purpose of the Operation and invited to seek interest in participation from Trading Standards Services within their region; up to the maximum provision of eight funded detection days per region. Critical to the selection process was the need to select only those areas with sufficient intelligence to render the deployment of the detection dog teams worthwhile.

The searches commenced in December 2015 and concluded at the end of April 2016.

In advance of the searches, each SPOC was equipped with guidance and a data collection sheet that had been agreed in advance with HMRC. A data collection sheet was completed for each of the search days and returned to the SPOC for regional analysis and collation. Upon the conclusion of the eight search days, each SPOC returned a composite data sheet to CTSI for reporting purposes.

Participants were also requested to photograph the location of seizure sites and to provide a set of images together with the data collection sheet to CTSI.

6. Findings & Results

The following tables and charts provide details of the results of Operation Henry 2.

6.1 Regions and visits

In total, 409 visits were undertaken as part of OH2. The greatest number of visits occurred in the Yorkshire & Humber region (64 visits); the fewest visits occurred in the North East with 26 visits undertaken.

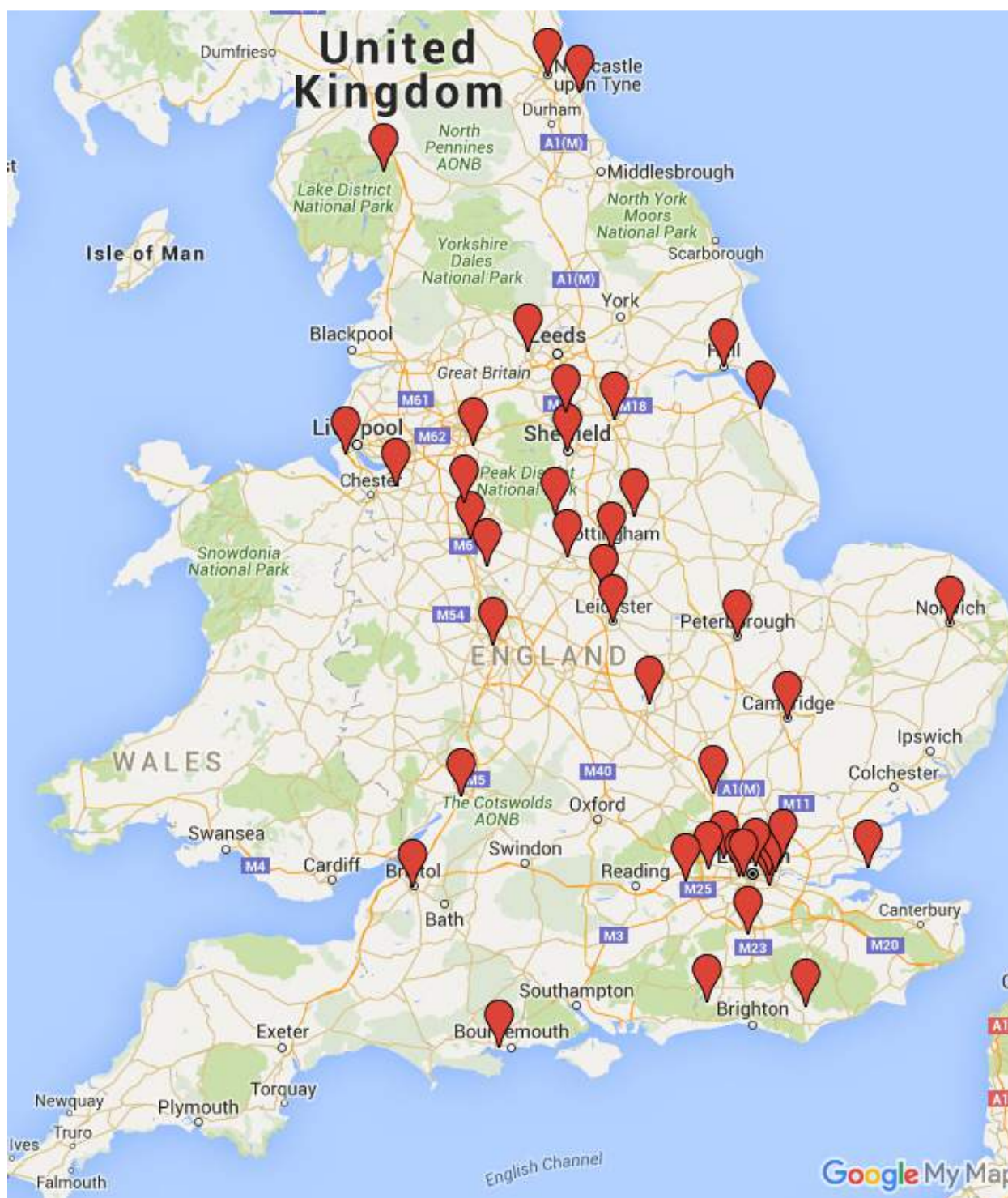
Illicit tobacco products were seized from 172 premises, which is 42% of all premises visited. The highest seizure rate was in the West Midlands, where illicit tobacco products were seized from 68% of the premises visited (or 21 out of 31 premises visits). The lowest seizure rate was in the South West where 21% of visits resulted in seizures (or 10 premises out of 48 visited).

See Annex 1 for complete list of all participating Trading Standards Services and outcomes.

Region	Number of visits to premises	Number of seizures	% of visits where seizure made
East	41	20	49%
East Midlands	42	26	62%
London	51	29	57%
North East	26	7	27%
North West	47	22	47%
South East	59	16	27%
South West	48	10	21%
West Midlands	31	21	68%
Yorkshire and the Humber	64	21	33%
Total	409	172	42%

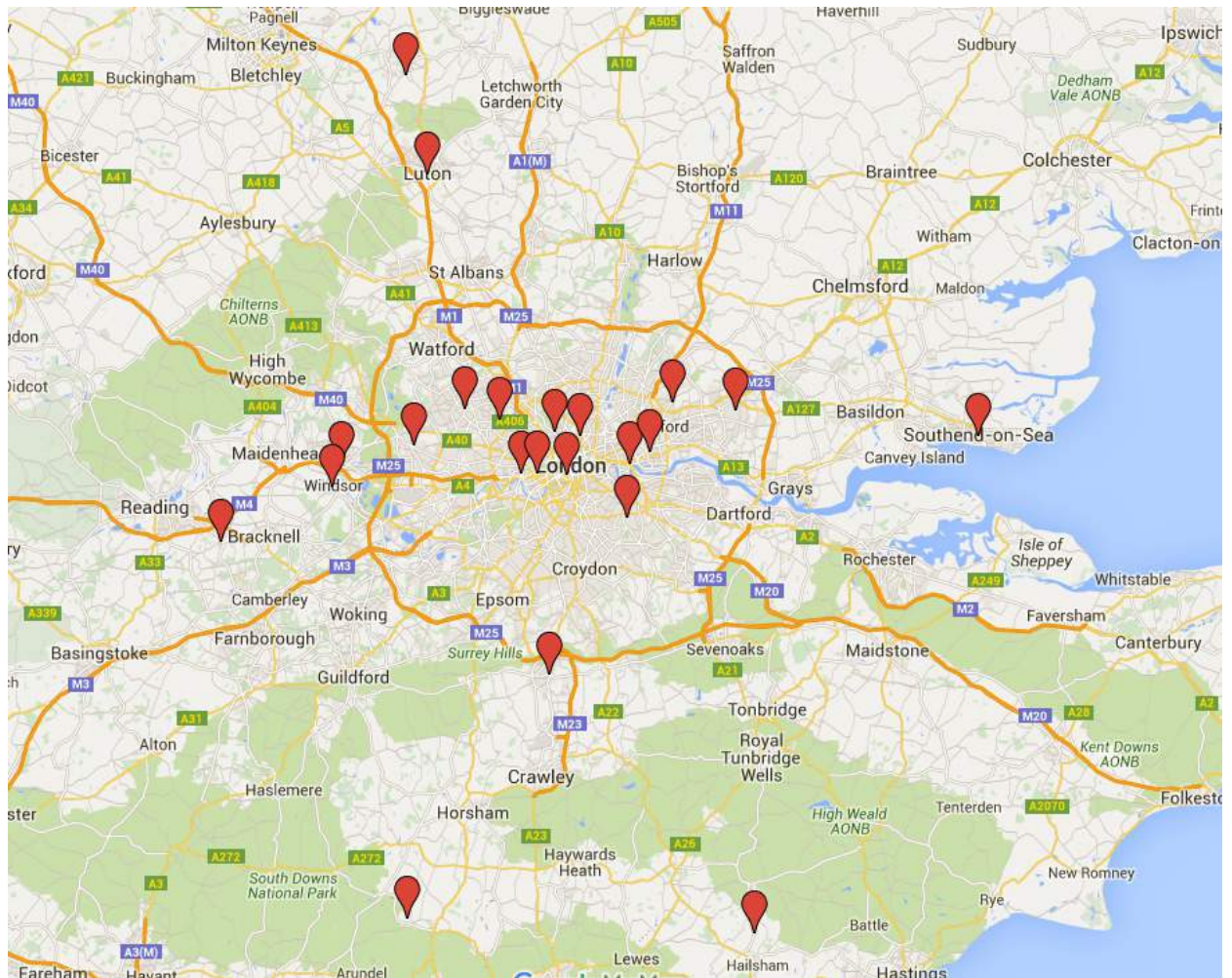
Table 1: Number of seizures by region

6.2 Map showing the spread of illicit tobacco seizures across Local Authorities in England



Map data ©2016 Geo-Basis-DE/BKG (©2000) Google

Figure 1: Map showing where seizures of illicit tobacco products were made across England by Local Authority Trading Standards



Map data © 2016 Google

Figure 2: Map showing where seizures of illicit tobacco products were made across London by Local Authority Trading Standards

The map clearly identifies the wide spread availability of illicit tobacco products detected across England.

6.3 Searches and seizures by premise type

The greatest number of visits were undertaken to retailers with a licence (alcohol) 209 (51% of ALL visits), followed by retailers without a licence 166 visits (40% of ALL visits). Please note however that the number of visits and seizures made to any particular type of premises does not provide an indication of the total amount of illicit tobacco seized from such.

No visits were made to markets during OH2. 1% visits were to ‘other premises’, which included the following premise types: Hairdressers, pawn brokers, festival shop, sporting goods outlet.

Premise Type	Total number of visits	Visits with seizure
Retailer - with licence	209	58
Retailer - no licence	166	100
Take away / restaurant / café	8	2
On Licensed / Club	4	2
Market	0	0
Private Accommodation	5	5
Self- store	8	2
Vehicle	3	2
Other	6	1
Total	409	172

Table 2: Visits by premise type

The greatest proportion of visits resulting in seizures of illicit tobacco products occurred at private flats (100%); however it should be noted that there were only five visits to private flats. This was followed by seizures from vehicles (66%); note however that only 3 vehicles were subject to search and small retailers (without licence) where 60% of visits resulted in seizures.

The fewest seizures were reported at self-stores (and yet the largest single seizure of illicit tobacco products was made from a self- store) and take away / restaurants and clubs. Note however that only eight of each such business category were visited in total. There was one seizure made from a premises described as “other”, this was a hairdressers.

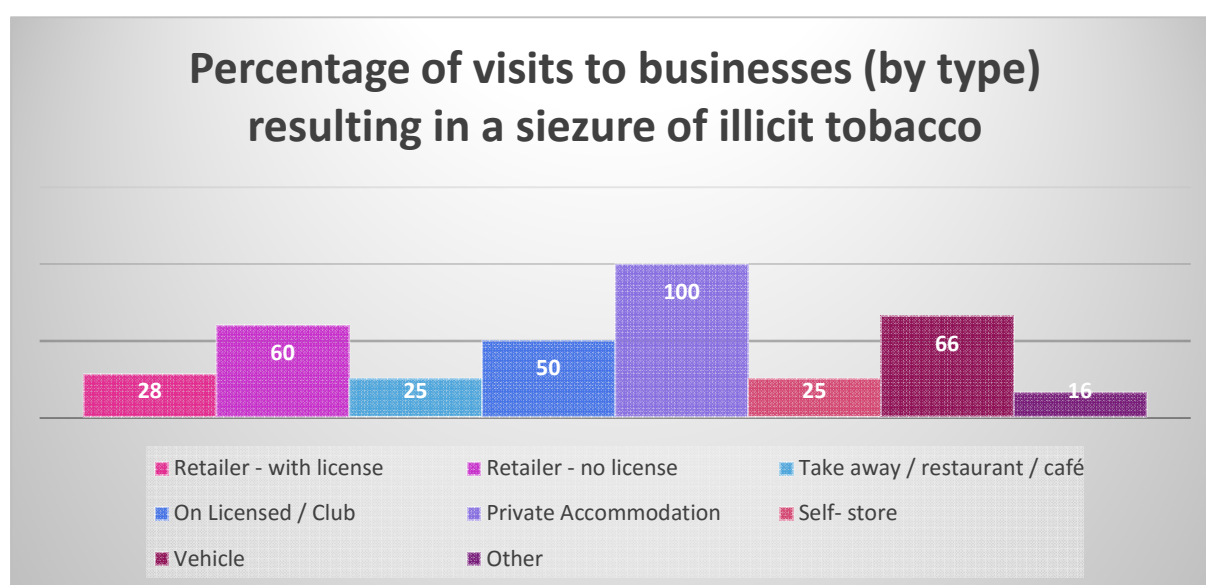


Figure 3: Percentage of visits resulting in a seizure by premise type

6.4 Seizures by premise type and region

Premise type	East	East Midlands	London	North East	North West	South East	South West	West Midlands	Yorkshire and the Humber	Total
Retailer - with license	6	9	15	3	5	5	4	1	10	58
Retailer - no license	12	14	12	4	17	11	6	19	5	100
Take away / restaurant / café	1	0	1	0	0	0	0	0	0	2
On Licensed / Club	1	0	0	0	0	0	0	1	0	2
Market	0	0	0	0	0	0	0	0	0	0
Private Accommodation	0	1	0	0	0	0	0	0	4	5
Self- store	0	2	0	0	0	0	0	0	0	2
Vehicle	0	0	0	0	0	0	0	0	2	2
Other	0	0	1	0	0	0	0	0	0	1
Total	20	26	29	7	22	16	10	21	21	172

Table 3: Number of seizures by type of premise and region

6.5 Quantity of illicit product seized by type, region and value of seizure

	London	East	South East	South West	East Midlands	West Midlands	North West	North East	Yorkshire & Humber	Total	Value
Cheap whites	19560	41040	5520	20020	1329534	130933	3873	61000	43320	1,654,800	£399,303.24
Counterfeit cigarettes	10520	1940	2160	9120	408220	29280	5883	3300	23430	493,853	£119,166.72
Genuine non UK duty paid cigarettes	50280	29020	38080	23160	409208	29600	14720	24940	32788	651,796	£157,278.37
Illicit HRT	256.35	44.07	28.05	30.85	633.25	49.1	140.05	33.35	57.15	1272.22	£236,302.14
Raw Tobacco	0.775	0	0	0	0		0.95	0		1.725	Nil
Pouches	16	0	0	30	0		52	9	30	137	Unable to provide
Shisha	7.2	0	28	0	0	2.6	0	0	6.5	44.3	£4,603.21
Smokeless tobacco	16.6	0	1.11	0	0	0.85	1.7	0	2.76	23.02	£2,392.00

Table 4: Quantity of illicit tobacco seized by type, region and value

Please note: Cigarettes are counted by stick, HRT, Raw Tobacco, Shisha and Smokeless tobacco are indicated in KG

Values have all been calculated using the duty rates that were in force before 16 March 2016. (Budget day).

Cigarettes = 16.5% of the retail price plus £189.49 per 1000 cigarettes.

Hand rolling tobacco = £185.74 per kilogram

Other smoking tobacco = £103.91 per kilogram

The total value of seized product is: £919,045.68

6.5.1 Summary of seizures

During OH2 the following illicit tobacco products were seized in total; the range of quantities are also stated:

- **Cheap white cigarettes:** 1,654,800 sticks were seized in total. The greatest quantity of sticks were seized in the East Midlands (1,329,534 sticks). The fewest sticks were seized in the North West (3,873 sticks)
- **Counterfeit cigarettes:** 493,853 sticks were seized in total. The greatest quantity of sticks were seized in the East Midlands (408,220 sticks). The fewest sticks were seized in the Eastern Region (1,940 sticks)
- **Genuine non-UK duty paid cigarettes:** 651,796 sticks were seized in total. The greatest quantity of sticks were seized in East Midlands (409,208). The fewest sticks were seized in the North West (14,720).

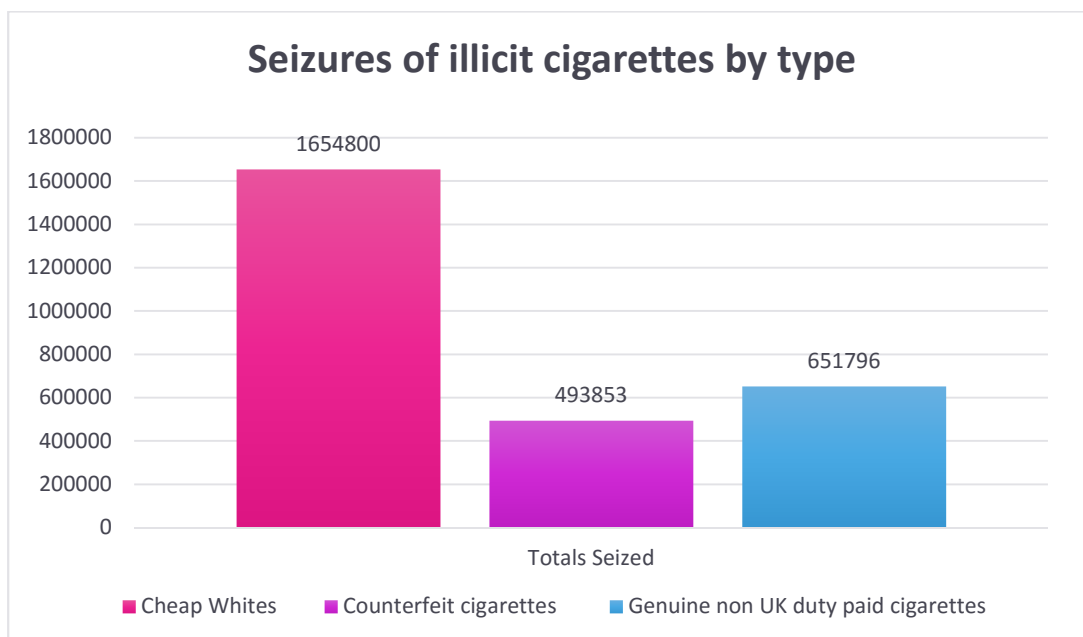


Figure 4: Seizures of illicit cigarettes by type

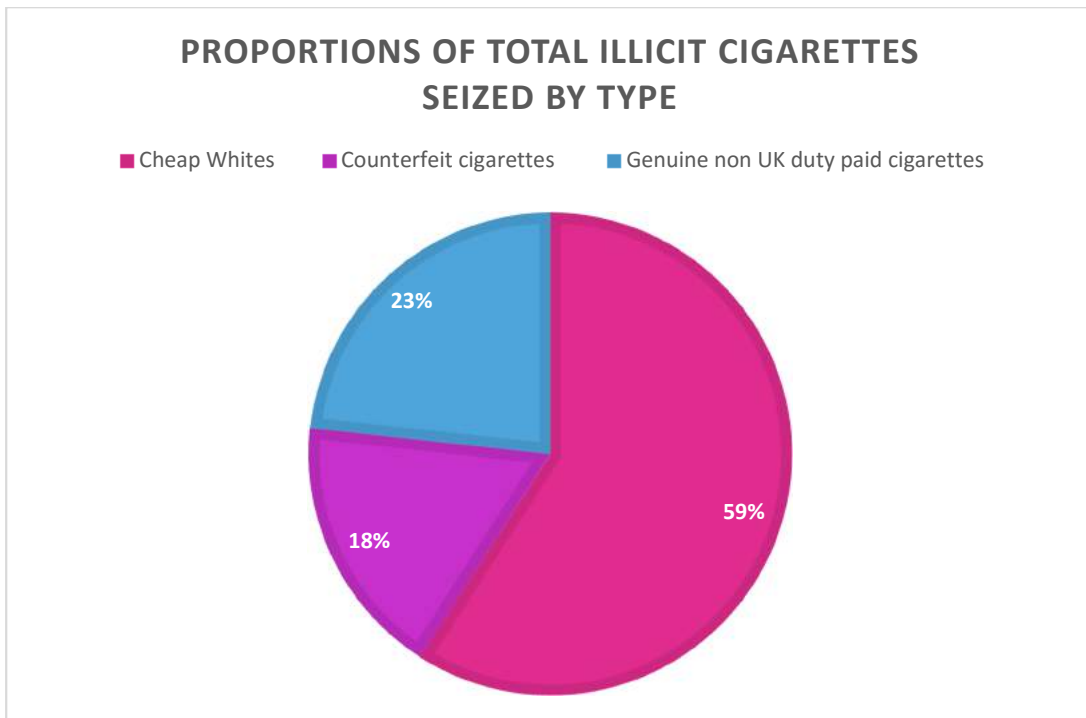


Figure 5: Proportions of total illicit cigarettes seized by type

- **Illicit hand rolling tobacco:** 1272.22 kg was seized in total. The greatest quantity was seized in the East Midlands (633.25kg of all seized). The smallest quantity of illicit HRT was found in the South East Region(28.05kg)
- **Raw tobacco:** 1.725 kg was seized in total.
- **Counterfeit tobacco packaging/pouches:** 137 pouches were seized in total.
- **Shisha:** 44.3 kg of Shisha was seized in total. The greatest quantity was seized in the South East region.
- **Smokeless tobacco:** 23kg of smokeless tobacco was seized in total. The greatest quantity being seized in the London region.

6.6 Cheap white cigarettes

Respondents were asked to state the MAIN brand of cheap white cigarette where a seizure was made. The quantities for the “top 8 “brands⁴ are detailed in the table below; these are indicative and not “actual” quantities. The largest indicative number of cheap whites seized were “West”; with one seizure of 1,078,534 sticks made from a self-store facility in the East Midlands. The table 5 below provides further information.

Brand	Indicative quantities in sticks
West	1078534
Winston	190180
NZ	119803
Other	81984
Fest	53880
Minsk	40430
Brass	27700
Jin Ling	19020

Table 5: Seizures of cheap white cigarettes by brand

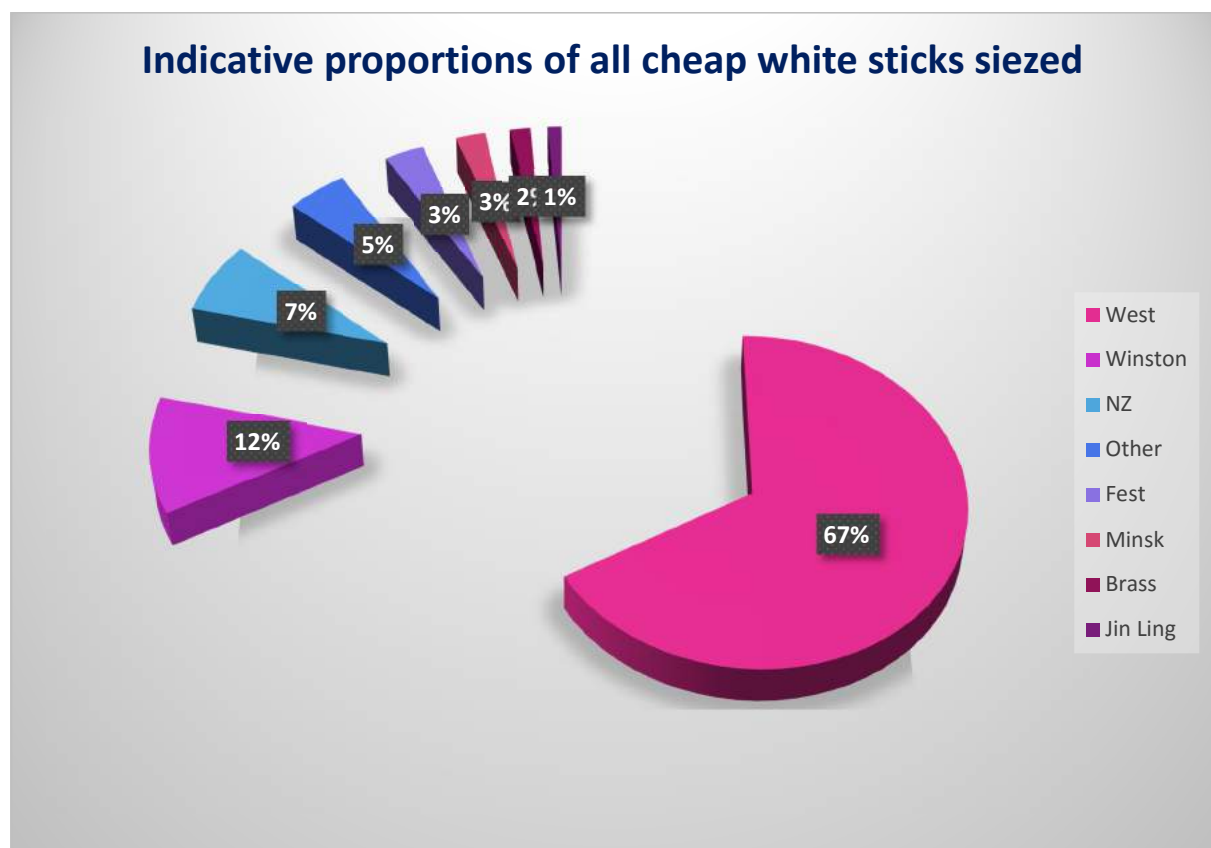


Figure 6: Indicative proportions of all cheap white cigarettes seized

⁴ Smaller quantities of other brands were also seized including: Yes Smoke, Richman, and Richman Royal.

If the single seizure of West is removed from the data, the chart below shows the main brands of cheap whites seized during OH2. Where “other” is stated this includes: American Legend, Amnesia and TS brand.

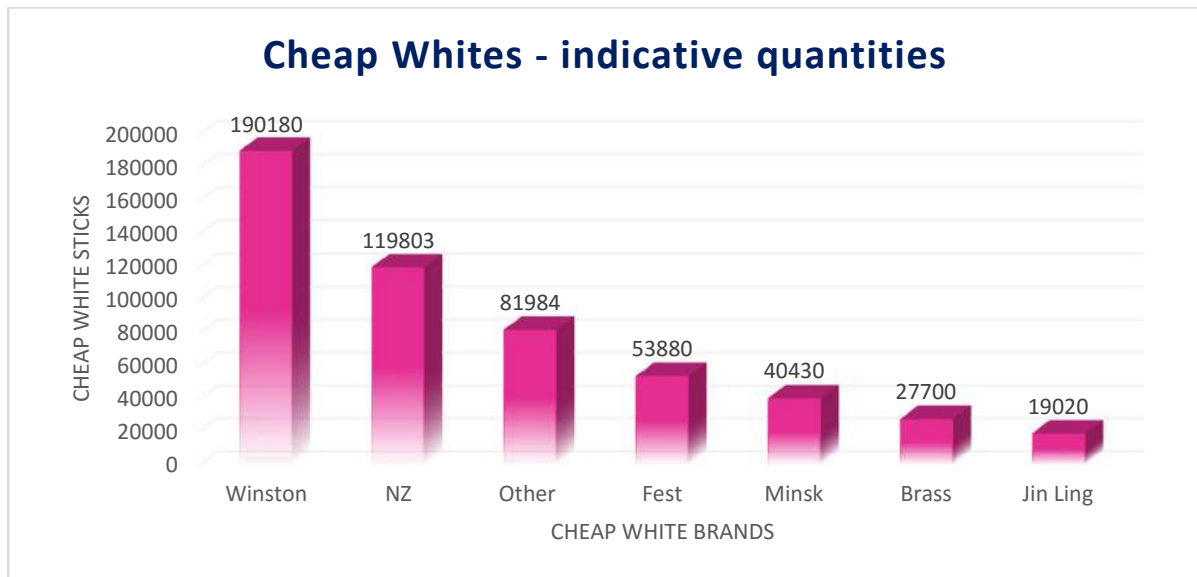


Figure 7: Indicative quantities of cheap white cigarettes seized

6.7 Illicit HRT brands

Respondents were asked to state the MAIN brand of illicit HRT seized and to indicate the quantity in kilogrammes. The quantities detailed in the chart table below are actuals seized from retail premises.

The chart does not however show the largest single seizure of illicit Golden Virginia HRT (551.45kg) made from the self-store in the East Midlands. The total quantity of Golden Virginia seized was 983.8kg.

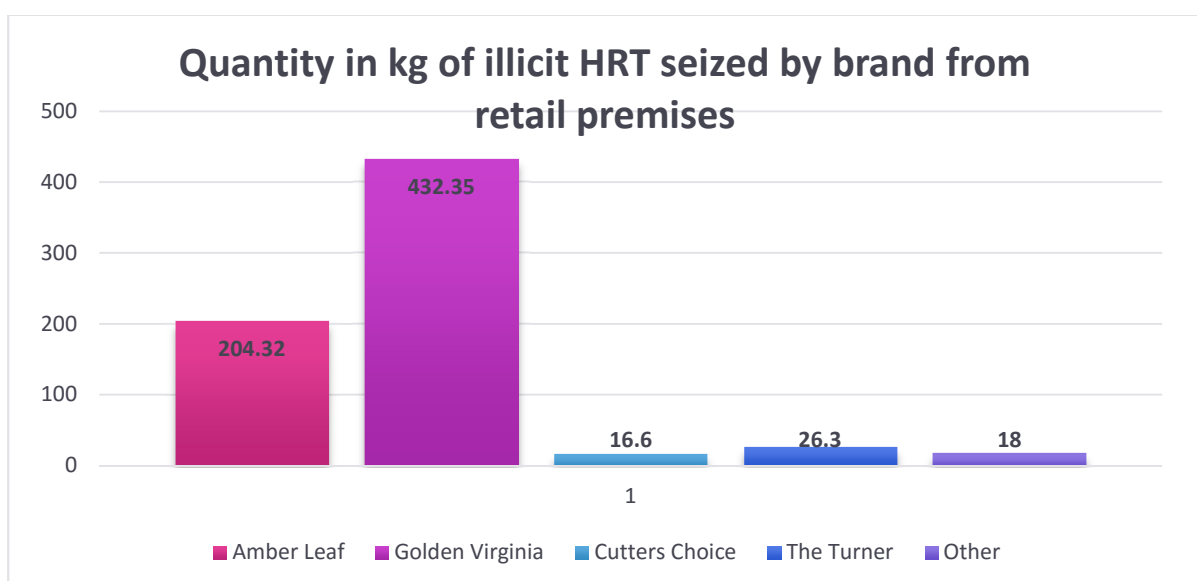


Figure 8: Quantity of illicit HRT seized from retail premises (in kilograms)

6.8 Location of illicit tobacco products

Experience gained during Operation Henry [2014] proved useful in the searching of premises and vehicles. However, without the expertise of the tobacco detection dog search teams, the majority of the seizures would not have taken place.

See Annex 2 for photographic examples of seizure sites from across the regions.

6.9 Repeat offenders

Of the 172 premises where a seizure was recorded, 97 of those (57%) businesses were repeat offenders.

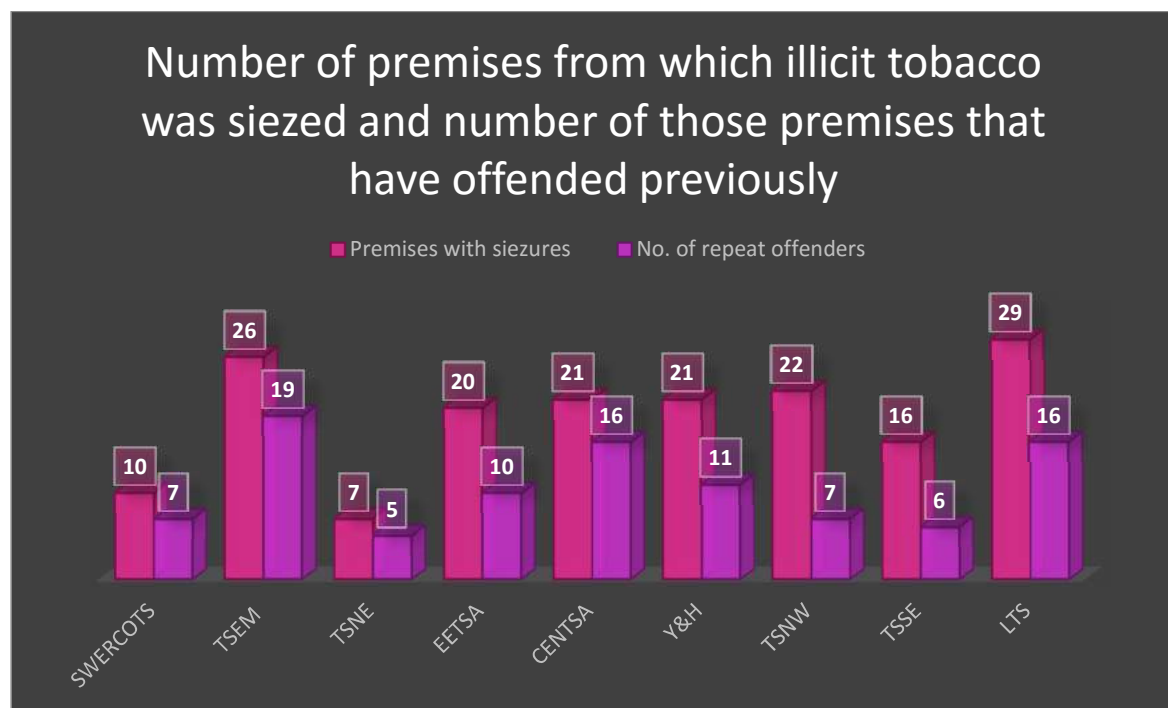


Figure 9: Repeat offenders

6.10 Other matters

During the OH2 searches, there were a number of seizures of other goods including : the seizure of illicit alcohol and counterfeit viagra , cannabis and cash. One region also reported immigration issues these were referred to the Border Agency .

7. Comparison of data between Operation Henry 1 [2014] and OH2

During Operation Henry [2014] a total of 376 visits were undertaken, with illicit product seized from 209 premises, which is 56% of all premises visited.

During OH2, a total of 409 premises were visited, with product seized from 172. This represents a seizure from 42% of all premises visited.

In total, an additional 205,591 sticks were seized during OH2 plus an additional 547.22 kg of illicit HRT. There has been a shift in the “category” of the sticks seized with a greater number of cheap whites seized and a marked decline in the seizure of genuine non UK duty paid cigarettes.

The amount of illicit HRT has increased considerably, however the seizures of raw tobacco were found to be negligible during OH2.

The table 6 below provides a summary.

	Total OH [2014]	Total OH2	Difference
Cheap whites Sticks	615,540	1654800	+1,021,260
Counterfeit cigarettes sticks	123,342	493853	+360,511
Genuine non UK duty paid cigarettes sticks	1,855,976	651796	- 1,222,180
TOTAL STICKS	2,594,858	2,899,449	+ 205,591 STICKS
Illicit HRT(kg)	725	1272.22	+547.22
Raw Tobacco (kg)	753	1.725	-751.275
Pouches	2606	137	-2469
Shisha (kg)	77	44.3	-32.7
Smokeless tobacco (kg)	4	23.02	+19.02
Value of seized products	£753,499	£919,045.68	+ £165, 546

Table 6: Comparison of seizures made during Operation Henry 2014 and OH2

8. Conclusions

1. Coordinated activity across England by Trading Standards Services helps to develop the intelligence picture of the supply of illicit tobacco products. Such planned and coordinated activity is only possible with the provision of additional resources; in this case via the contractual arrangement between the DH and CTSI
2. OH2 has found that illicit tobacco is widely available in a variety of forms but particularly cheap white cigarettes across England; the detection of the products in the many and varied “ storage places “ is a specialised activity and requires expertise in tobacco detection such as that provided by dog search teams working in partnership with Trading Standards Service teams.
3. The high “ hit rate” of 84% of Trading Standards Services that took part in OH2 making at least one seizure , underlines the benefits of local and regional intelligence identifying where this illegal activity is taking place.
4. The majority of the seizures were of relatively small quantities; this suggests that only a small amount of stock is maintained at retail premises thus reducing the risk of a significant

loss of product during a search and seizure. Determination of the location of the larger stores relies upon intelligence and the sharing of such between agencies as was the case in the large seizure made in the East Midlands.

5. There has been a shift in the “category” of the cigarettes (sticks) seized with a greater number of cheap whites seized and a marked decline in the seizure of genuine non UK duty paid cigarettes. This may be as a result of improved recognition of brands by TSS field officers carrying out the searches. Enhanced guidance for TSS officers was prepared in advance of OH2 to assist in the correct identification of cheap white cigarette brands.
6. OH2 has highlighted the high level of repeat offending that is taking place with 57 % of businesses that were seized from during OH2 having had a previous seizure of illicit tobacco. This highlights the importance of taking full enforcement action locally. It may also suggest that the current sanctions / penalties available are not acting as a sufficient deterrent. This could be because the courts are not imposing the maximum penalties available to them OR that the range of sanctions are no longer fit for purpose. Further review of this is necessary.
7. OH2 has highlighted the high level of repeat offending that is taking place with 57 % of businesses that were seized from during OH2 having had a previous seizure of illicit tobacco. This tends to suggest that the current sanctions / penalties available are not acting as a sufficient deterrent. This could be because the courts are not imposing the maximum penalties available to them OR that the range of sanctions are no longer fit for purpose. Further review of this is necessary.
8. OH2 has demonstrated that where funding is specifically targeted at an activity that, for a relatively modest investment, (£40,439) significant returns in terms of seized product and associated evaded duty, may be achieved (£919,045.68 evaded duty). Note: This does not include the staffing costs associated with the Operation.

9. Recommendations

The following recommendations are made as a result of this Operation:

1. **CTSI** to publicise the outcomes of OH2 as widely as possible; highlighting the detriment that the widespread availability of illicit tobacco products brings to local communities. In addition , these outcomes to be shared with partners in the collaboration (DH , HMRC) plus Public Health England, Directors of Public Health and the Local Government Association.
2. **CTSI** to provide all “raw data” derived from OH2 to HMRC for intelligence sharing purposes.
3. **CTSI** to respond to the planned HMRC consultation on sanctions using data generated during OH2 to support the call for improved sanctions for offenders.
4. **CTSI** to approach Department of Health, HMRC and Public Health England for further support during 2017-18 to deliver a similar coordinated operation designed to remove illegal products from the supply chain at a local level and assist HMRC in gathering intelligence for the bigger picture.
5. **DH, HMRC** and **PHE** to note the findings of this report and to consider how support got TSS could be made available for future Operations.

Acknowledgements

The author is grateful to colleagues at the DH, HMRC, CTSI, TS regional coordinators, members of the Tobacco Focus Group and the numerous trading standards professionals who undertook the searches across the country.

Annex 1 Participation by Trading Standards Services in each region

✓ Denotes area where at least one seizure of illicit tobacco was made

X Denotes no seizure of illicit tobacco during searches made on this occasion

Trading Standards Region	Local Authority	Seizures made
London	Lewisham	✓
	Tower Hamlets	✓
	Brent	✓
	Harrow	✓
	Newham	✓
	Camden	✓
	Havering	X
	Redbridge	✓
	Islington	✓
	Hillingdon	✓
	Westminster	✓
	Hammersmith & Fulham	✓
	Kensington & Chelsea	✓
North East	Newcastle	✓
	Darlington	✓
	Durham	✓
	Stockton	✓
	Sunderland	✓
Yorkshire & Humber	Hull	✓
	North East Lincolnshire	✓
	Sheffield City Council	✓
	West Yorkshire	✓
	North Yorkshire	X
	Barnsley	✓
South East	Doncaster	✓
	Bucks & Surrey	✓
	East Sussex	✓
	Medway	✓
	Reading	✓
	Slough	X
	RB Windsor & Maidenhead	✓
	Kent	✓
West Midlands	West Berkshire & Wokingham	X
	West Sussex	✓
	Sandwell	✓
	Staffordshire	✓
East	Stoke on Trent	✓
	Central Bedfordshire	X
	Luton	✓
	Norfolk	✓
	Peterborough	✓
	Bedford Borough	X

	Suffolk	√
	Cambridgeshire	√
	Southend on Sea	√
South West	Gloucestershire	√
	Plymouth	X
	Borough of Poole	√
	Bristol	√
	Cornwall	X
	Torbay	X
	Dorset	X
East Midlands	Derbyshire	√
	Nottingham City	√
	Derby City	√
	Nottinghamshire	√
	Lincolnshire	√
	Leicestershire	√
	Leicester City	√
	Northamptonshire	√
North West	Bury	√
	Cheshire East	√
	Cheshire West & Chester	√
	Cumbria	√
	Lancashire	X
	Stockport	√
	Wirral	√
Total	67 authorities	56 V 11 x

Annex 2 Photographic examples from OH2 searches



Without the tobacco detection dogs and their handlers, the chances of successfully locating the hidden tobacco products is small; they are an essential part of the enforcement team.

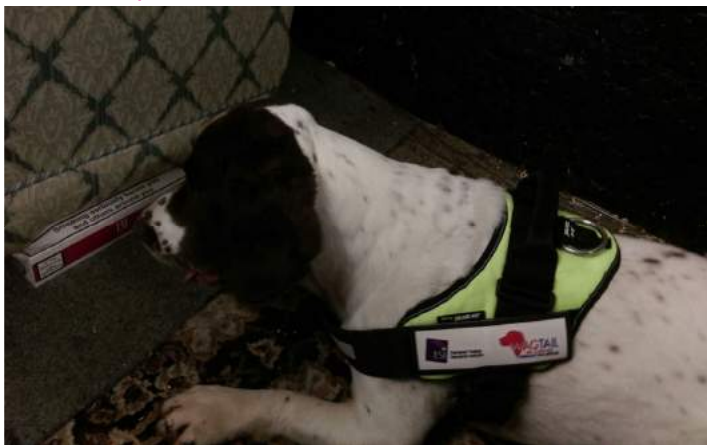




Image 1



Image 2



Image 3



Image 4



Image 5



Image 6



Image 7

Image number	Description	
1	Storage space within the wall	Y&H region
2	Behind a panel within the wall space	SW region
3	Sports bags in back of vehicle	Y&H region
4	Top of an unused freezer cabinet	NE Region
5	Under the floor tiles	SW region
6	Inside zipped bags	CENTSA region
7	Illicit product mixed with random boxes of other goods	CENTSA region