

OPERATION HENRY: TACKLING THE SUPPLY OF ILLICIT TOBACCO PRODUCTS IN ENGLAND 2014

Commissioned by the Department of Health
Tobacco Policy Team

Summary and Key Findings

- Operation Henry is the first large scale coordinated action by Trading Standards to tackle the local supply of illicit tobacco products across England
- The Operation was developed and managed by the 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
- 81 local authority Trading Standards Services took part in Operation Henry; seizures occurred in 67 of those authorities
- The majority of seizures were made at small retailers, independent newsagents and off license premises
- The highest seizure rate was in the North East of England with 94% of premises searched revealing illicit tobacco products
- The lowest seizure rate was in London with 28% of premises searched revealing illicit tobacco products
- There were 1,855,976 genuine non UK duty paid cigarettes seized
 - The largest single seizure was 1.4 million sticks detected at a self-store facility in London
- There were 615, 540 illicit white cigarettes seized with Jin Ling , Pect / Fest, NZ Gold and Gold Mount brands reported most often
 - The largest single seizure of illicit whites was 87,770 sticks detected at a business storage unit in the East of England
- The total value of the seized tobacco products was £753,499
 - £439,513.68 from the seizure of genuine non UK duty paid cigarettes
 - £145,766.03 from seizure of illicit white cigarettes
 - £92,395.52 from non UK duty paid hand rolling tobacco

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1. Introduction

“Operation Henry” was developed and managed by the Trading Standards Institute (TSI) on behalf of the Department of Health Tobacco Policy Team (DH). It is one of a number of funded projects arising from the regulatory service contract between TSI and DH designed to support and enhance local delivery of effective tobacco control activities.

2. Context

Whilst there has been a long-term decreasing trend in the cigarette illicit market share; the level in 2012-13 is three percentage points lower compared with 2008-09¹, tobacco smuggling remains a significant threat both to UK tax revenues and to public health. There is a known link to organised crime and, according to HM Revenue and Customs (HMRC), the unregulated distribution networks associated with smuggling “make tobacco more accessible to children and young people, and perpetuate health inequalities between different social groups”². [See Annex 7 for a description of illicit tobacco products]

HMRC estimate that in 2012-13, duty was not paid on around nine per cent of cigarettes and around 36 per cent of all hand-rolling tobacco smoked in the UK, with associated revenue losses of approximately £1.6 billion. The widespread availability of illicit tobacco products seriously undermines efforts to reduce smoking prevalence by making tobacco both more affordable and accessible.

The significance of the role of price and tax measures in reducing demand for tobacco is stated unequivocally in Article 6 of the World Health Organisation Framework Convention on Tobacco Control (FCTC)³. This article recommends that:

“The Parties recognize that price and tax measures are an effective and important means of reducing tobacco consumption by various segments of the population, in particular young persons and further that parties consider :

(a) implementing tax policies and, where appropriate, price policies, on tobacco products so as to contribute to the health objectives aimed at reducing tobacco consumption ; and

(b) prohibit or restrict, as appropriate, sales to and/or importations by international travellers of tax- and duty-free tobacco products. “

The Home Affairs Committee First Report on Tobacco Smuggling (2014)⁴ reiterates many of the points made in the previous strategy Tackling Tobacco Smuggling-building on our Successes: A renewed strategy for HM Revenue and Customs and the UK Border Agency (2011)⁵. It concludes however that:

¹ HMRC Measuring Tax Gaps : 2014 edition available online :

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364009/4382_Measuring_Tax_Gaps_2014_I_W_v4B_accessible_20141014.pdf [accessed 29th October 2014]

² Home Affairs Committee First Report : Tobacco Smuggling (June 2014) available online :

<http://www.publications.parliament.uk/pa/cm201415/cmselect/cmhaff/200/20003.htm> [accessed 29th October 2014]

³ WHO Framework Convention on Tobacco Control (updated 2005) available online :

<http://whqlibdoc.who.int/publications/2003/9241591013.pdf> [accessed 14th November 2014]

⁴ Home Affairs Committee First Report : Tobacco Smuggling (June 2014) available online :

<http://www.publications.parliament.uk/pa/cm201415/cmselect/cmhaff/200/20003.htm> [accessed 29th October 2014]

⁵ Tackling Tobacco Smuggling – building on our successes: A renewed strategy for HM revenue and Customs and the UK Border Agency (2011) available online : <http://webarchive.nationalarchives.gov.uk/+/http://www.hmrc.gov.uk/news/tackling-tobacco.htm> [accessed 29th October 2014]

“While there have been some high profile successes, over the last three years the numbers of prosecutions and convictions for organised crime cases involving tobacco have fallen. We do not believe that these numbers are decreasing due to the reduction in this type of crime and are deeply concerned that these figures may indicate a reduction in enforcement action”.

Whilst Local Authority trading standards continue to work in partnership with HMRC and the UK Border Agency (UKBA) to tackle this problem, the Home Affairs Committee report makes it clear there is scope for improvement and particularly in the sharing of good practice between agencies.

3. Scope

This report concerns the delivery and results of Operation Henry during the time period April to November 2014. The Operation has been delivered through Local Authority Trading Standard Services across nine English Regions. See Annex 1 for participating Local Authorities by Region and an outline indication of activity. A separate report evaluating the outcomes of the Operation has been commissioned

4. Purpose

Operation Henry was designed to assist Local Authority Trading Standards Services tackle the supply of illicit tobacco in their localities by providing them with access to funded tobacco detection dogs. The total budget for this Operation was £40,436⁶; sufficient to deliver eight days of searches per region, (producing 72 search days in total across England in a seven month period), to analyse the data, report the findings and to evaluate the overall success of the operation. In addition to enhancing local activity, the data collected during this National Operation has been used to assist in the identification of new and emerging trends in illicit tobacco supply of interest to the DH, TSI and HMRC.

The findings have been made available to the Department of Health, Public Health England, HMRC and the Trading Standards Institute.

5. Method

This Operation was essentially a collaboration between the Department of Health Tobacco Policy Team, TSI, Wagtail UK Ltd the tobacco detection dog supplier, and the Regional coordinators of trading standards working with local authority trading standards services.

Wagtail UK Ltd were engaged from the outset of this Operation and were selected by virtue of their experience of working with trading standards services and their excellent reputation in the field. Details of the handlers and dogs that were involved in Operation Henry may be found at Annex 2. To facilitate communications with Local Authority trading standards, each region provided a single point of contact (SPOC) through which all communications regarding this Operation were channelled.

⁶ Note : This sum does not include operational staffing costs incurred by the Local Authority

Each SPOC was advised of the purpose of the Operation and invited to seek interest in participation from Local Authority 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 authorities with sufficient intelligence to render the illicit tobacco searches worthwhile.

The searches commenced in the week of the 19th May in the North West of England and concluded in the week commencing 3rd November in London.

In advance of the searches, each SPOC was equipped with guidance and a data collection sheet found at Annex 3 and 4. 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 TSI 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 TSI.

A template press release was prepared by the TSI press team for the Operation Henry. This was distributed to all participants with the request that it be used wherever possible in local publicity. A copy of the template may be found at Annex 5.

6. Findings & Results

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

6.1. Regions and searches made

In total, 376 visits were undertaken as part of Operation Henry. The greatest number of visits occurred in London (53 visits); the fewest visits occurred in the North East with 16 visits undertaken.

Illicit tobacco products were seized at 209 premises, which is 56 per cent of all premises visited. The highest seizure rate was in the North East, where illicit tobacco products were seized at 94 per cent of the premises visited (or 15 premises out of 16 visited). The lowest seizure rate was in the North West where 33 per cent of visits resulted in seizures (or 16 premises out of 48 visited).

Note: Where, as in the case of the North East region, a high seizure rate occurs, this has the effect of reducing the total number of visits possible as a result of the time required to complete each seizure in each premises.

Region	Number of visits to premises	% of total number of visits undertaken by region	Number of seizures	% of visits where seizure made
East	39	10	29	74
East Midlands	37	10	32	86
London	53	14	15	28
North East	16	4	15	94
North West	48	13	16	33
South East	30	8	21	70
South West	50	13	27	54
West Midlands	51	14	28	55
Yorkshire and the Humber	52	14	26	50
Total	376	100	209	56

Table 1: Number of seizures by region

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



Figure 1: Map showing where seizures of illicit tobacco products were made by Local Authority Trading Standards produced by HMRC Intelligence Assessment Team

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

6.2. Searches and seizures by premise type

Where respondents were able to provide the type of premise visited (369 out of 376 premises), the greatest number of visits were undertaken to small retailers (40 per cent of visits), followed by independent newsagents (25 per cent of visits).

Least frequently visited were markets and private flats (two and four visits respectively). Fourteen per cent of visits were to 'other premises', which included among other premise types: self-storage units, hand car wash facilities and take away food establishments.

Premise Type	Number of visits	% of visits
Small Retailer	147	40
Independent newsagents	92	25
Off licence	67	18
On Licensed premises/Club	6	2
Private Flat	4	1
Market	2	1
Other	51	14
Total	369	100

Table 2: Visits by premise type

The greatest proportion of visits resulting in seizures of illicit tobacco products occurred at private flats (75 per cent); however it should be noted that there were only four visits to private flats. This was followed by small retailers (where 63 per cent of visits resulted in seizures) and off-licences (where 58 per cent of visits resulted in seizures).

The fewest seizures were reported at on licensed premises and clubs; however it should be noted again that only six such businesses were visited in total. Of note 61 per cent of seizures occurred in premises listed as 'other'.

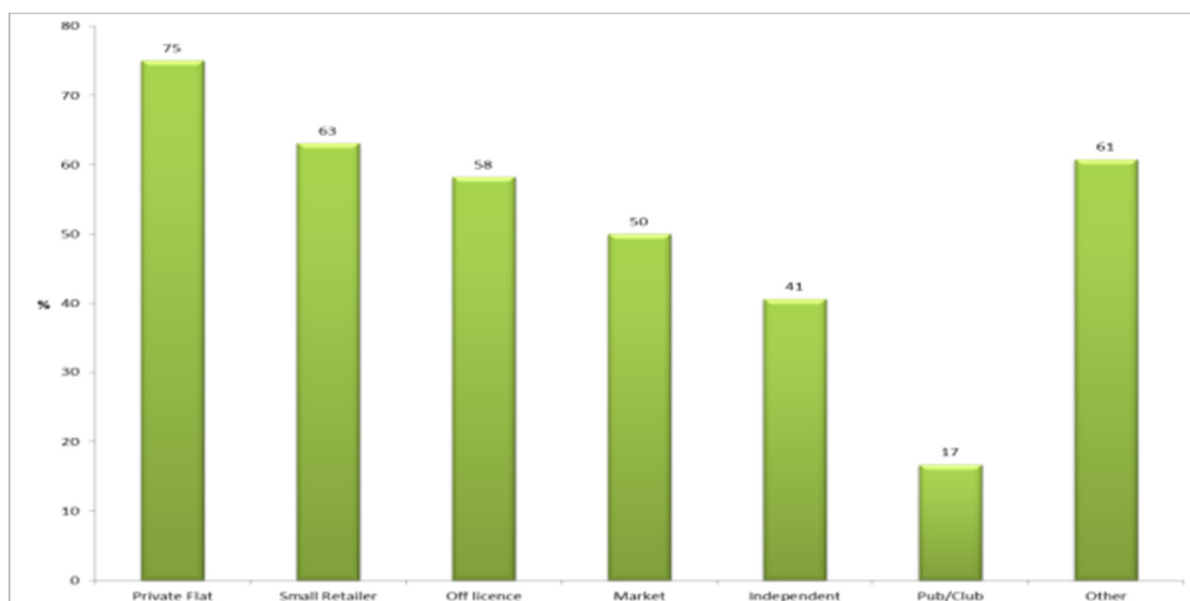


Figure 2: Seizures by premise type

Base: Small retailer (147), Independent (92), Off-licence (67), Pub/club (6), Private flat (4), Market (2), Other (51).

6.3. 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
Small retailer	12	20	5	7	1	12	7	16	13	93
Off licence	7	7	2	2	5	5	3	6	2	39
Independent news	6	2	3	2	9	1	2	5	8	38
Private flat	1	1	0	0	1	0	0	0	0	3
Market	0	0	0	0	0	1	0	0	0	1
On licensed Premises / club	0	0	0	0	0	0	1	0	0	1
Other	3	2	5	1	0	2	14	1	3	31
Total	29	32	15	12	16	21	27	28	26	206

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

It should be noted that the North East reported three seizures that were not coded by premise type; these have not been included in the table above.

6.4. Quantity of illicit product seized by type and region and value of seizure

Region	Illicit white cigarettes (sticks)	Counterfeit cigarettes (sticks)	Genuine non UK duty paid cigarettes (sticks)	Counterfeit hand rolling tobacco (kgs)	Genuine non-UK duty paid hand rolling tobacco (kgs)	Raw tobacco (kgs)	Counterfeit tobacco packaging/ pouches (number)	Shisha (kgs)	Smokeless tobacco (kgs)
East	161,927	13,292	76,678	30	16	1	0	0	1
East Midlands	83,363	10,740	38,080	58	13	750	213	0	0
London	11,260	0	1,493,703	0	37	0	0	3	0
North East	37,140	19,855	7,440	25	205	2	2,332	5	0
North West	119,314	12,560	2,700	7	27	0	0	0	0
South East	15,880	20,780	53,260	4	111	0	23	2	3
South West	25,860	20,320	42,940	3	50	0	38	0	0
West Midlands	109,198	14,198	64,581	36	33	0	0	30	0
Yorkshire and the Humber	51,598	11,597	76,594	49	20	0	0	37	0
Total quantity	615,540	123,342	1,855,976	213	512	753	2,606	77	4
Value in £	£145,766.03	£29,208.62	£439,513.68	£38,437.98	£92,395.52	£nil	Unknown	£7,773.92	£403.84

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

Please note:

Where quantities are in Kgs they have been rounded to the nearest kilogram.

Value is a measure of evaded duty and has been calculated by HMRC: the total value of seized product is: £753,499

6.4.1 Summary of seizures

During Operation Henry the following illicit tobacco products were seized in total; the largest and smallest quantities are also stated:

- **Illicit white cigarettes:** 615,540 sticks were seized in total. The greatest quantity of sticks were seized in the East of England (161,927 sticks, or 26 per cent of all sticks). The fewest sticks were seized in London (just two per cent, or 11,260 sticks)
- **Counterfeit cigarettes:** 123,342 sticks were seized in total. The greatest quantity of sticks were seized in the South East (20,780 or 17 per cent of all sticks). No sticks were seized in London.
- **Genuine non-UK duty paid cigarettes:** Just over 1.8 million sticks were seized in total. The greatest quantity of sticks were seized in London (nearly 1.5 million or 80 per cent of all sticks seized). The fewest sticks were seized in the North West (2,700, or less than 0.5 per cent of all sticks seized).
- **Counterfeit hand rolling tobacco:** 213 kgs were seized in total. The greatest quantity was seized in the East Midlands (58kgs or 27 per cent of all seized). No counterfeit hand rolling tobacco was seized in London.
- **Genuine non-UK duty paid hand rolling tobacco:** 512 kgs were seized in total. The greatest quantity amount was seized in the North East (205kgs or 40 per cent of all seized). The smallest amount was seized in the East Midlands and the North East (13kgs, or three per cent of all seized).
- **Raw tobacco:** 753 kgs were seized in total. The greatest quantity was seized in the East Midlands (750 kgs), with two kilograms being seized in both the North East and one kilogram in the East Midlands. No raw tobacco was seized in any other region.
- **Counterfeit tobacco packaging/pouches:** 2,606 pouches were seized in total. The greatest quantity were seized in the North East (2,332 or 89 per cent of all seized). No counterfeit tobacco packaging/pouches were seized in the East, London, the North West, the West Midlands or Yorkshire and the Humber.
- **Shisha:** 77kgs of Shisha was seized in total. The greatest quantity was seized in Yorkshire and the Humber (37kgs or 48 per cent of all seized). No shisha was seized in the East, the East Midlands, the North West or the South West.
- **Smokeless tobacco:** Four kilograms of smokeless tobacco was seized in total. Three kilograms were seized in the South East and one kilogram in the East.

6.5. Largest single seizure by product type

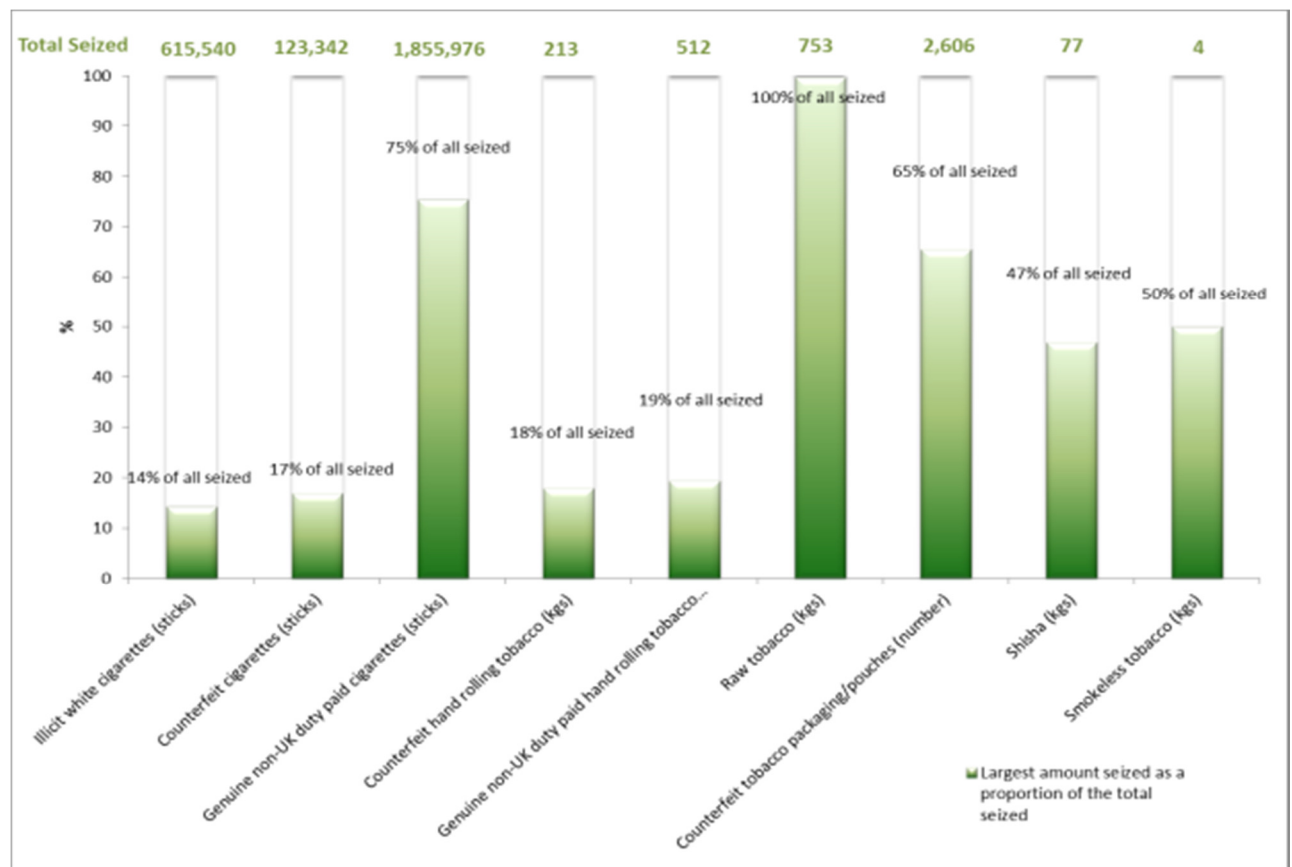


Figure 3: Largest single seizure of illicit tobacco as a proportion of total by product type

Illicit tobacco	Amount seized	Region	Premise type
Illicit white cigarettes (sticks)	87,770	East	Other (Business storage unit)
Counterfeit cigarettes (sticks)	20,760	South East	Small retailer
Genuine non-UK duty paid cigarettes (sticks)	1,400,000	London	Other (Self – storage)
Counterfeit hand rolling tobacco (kgs)	38	East Midlands	Private flat
Genuine non-UK duty paid hand rolling tobacco (kgs)	99	North East	Small retailer
Raw tobacco (kgs)	750	East Midlands	Other (Take away)
Counterfeit tobacco packaging/pouches (number)	1,704	North East	Off licence
Shisha (kgs)	36	Yorkshire and the Humber	Independent
Smokeless tobacco (kgs)	2	South East	Off licence

Table 5: Largest seizure by category, including region and premise type

6.5.1. Summary

Table 5 displays the largest seizure of each illicit tobacco product on a single visit, by quantity, region and premise type. Of note, every region which seized the greatest total amount of any one illicit tobacco product, also recorded the largest single seizure of that tobacco product.

- **Illicit white cigarettes:** In the East 87,770 sticks were seized from one visit to a premise classified as other; this one visit resulted in 54 per cent of the total seizure for this region (which was 161,927 sticks).
- **Counterfeit cigarettes:** In the South East 20,760 sticks were seized from one visit to a small retailer; this one visit resulted in 99 per cent of the total seizure for a region (which was 20,780 sticks).
- **Genuine non-UK duty paid cigarettes:** In London 1.4 million sticks were seized from one visit to a premise classified as other; this one visit resulted in 94 per cent of the total seizure for a region (which was 1,493,703 sticks).
- **Counterfeit hand rolling tobacco:** In the East Midlands 38kgs were seized from one visit to a private flat; this one visit resulted in 65 per cent of the total seizure for a that region (which was 58kgs).
- **Genuine non-UK duty paid hand rolling tobacco:** In the North East 99kgs was seized from one visit to a small retailer; this one visit resulted in 48 per cent of the total seizure for that region (which was 205kgs).
- **Raw tobacco:** In the East Midlands 750 kgs was seized from one visit to a premise classified as 'other'; this was 100 per cent of all tobacco seized for the East Midlands.
- **Counterfeit tobacco packaging/pouches:** In the North East 1,704 packages/pouches were seized from one visit to an off-licence; this one visit resulted in 73 per cent of the total seizure for that region (which was 2,332 packages/pouches).
- **Shisha:** In Yorkshire and the Humber 36kgs was seized from one visit to an independent newsagent; this one visit resulted in 97 per cent of the total seizure for that region (which was 37kgs).
- **Smokeless tobacco:** In the South East two kilograms was seized from one visit to an off-licence; this one visit resulted in 67 per cent of the total seizure for that region (which was three kilograms).

6.6 Illicit white cigarettes

For 112 premise visits where illicit white cigarettes were seized and the brand of illicit white cigarette seized could be reported, the most frequently seized brand was Jin Ling (at 33 premises), followed by PECT (at 18 premises).

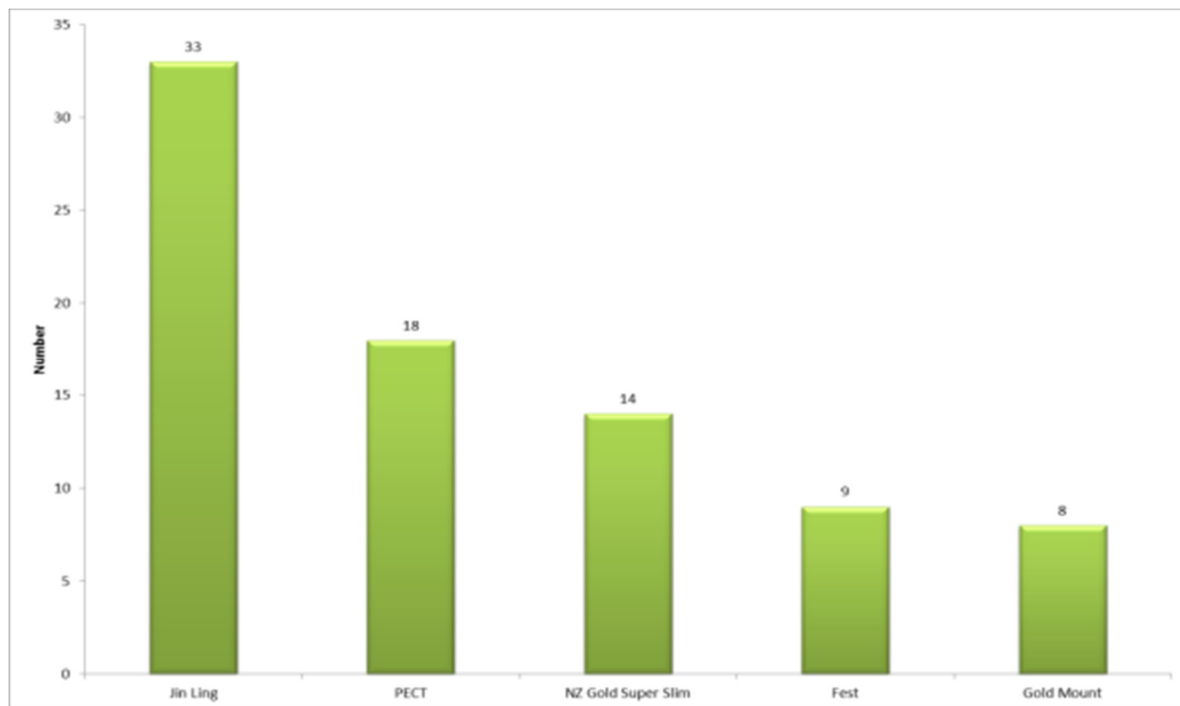


Figure 4. Brands of illicit white cigarettes most frequently seized

Base: premises where detail provided on the brand of illicit white cigarettes seized (112)

6.7 Location of illicit tobacco products

A wide range of “hiding places” were detected by the search dogs during Operation Henry; most of which would not have been possible without the use of the tobacco detection dog search teams. The places included: behind mirrors and light fittings, within animal carcasses, under the tray of a parrots cage, under floor boards and packed amongst egg cartons.

Attempts were taken in some instances to deflect the detection dog by spreading detergent powder or coffee granules around the hiding place. This however was not successful.

In addition to the detection of illicit tobacco products, on a number of occasions other counterfeit items were discovered including alcohol. A large seizure of cash was also made as a result of one search carried out in the East of England.

See Annex 6 for photographic examples of seizure sites from across the regions.

6.8 Repeat offenders

Of the 209 recorded seizures: 37 per cent of businesses were repeat offenders, with 52 per cent being first time offenders, and the remainder (11 per cent) not being recorded.

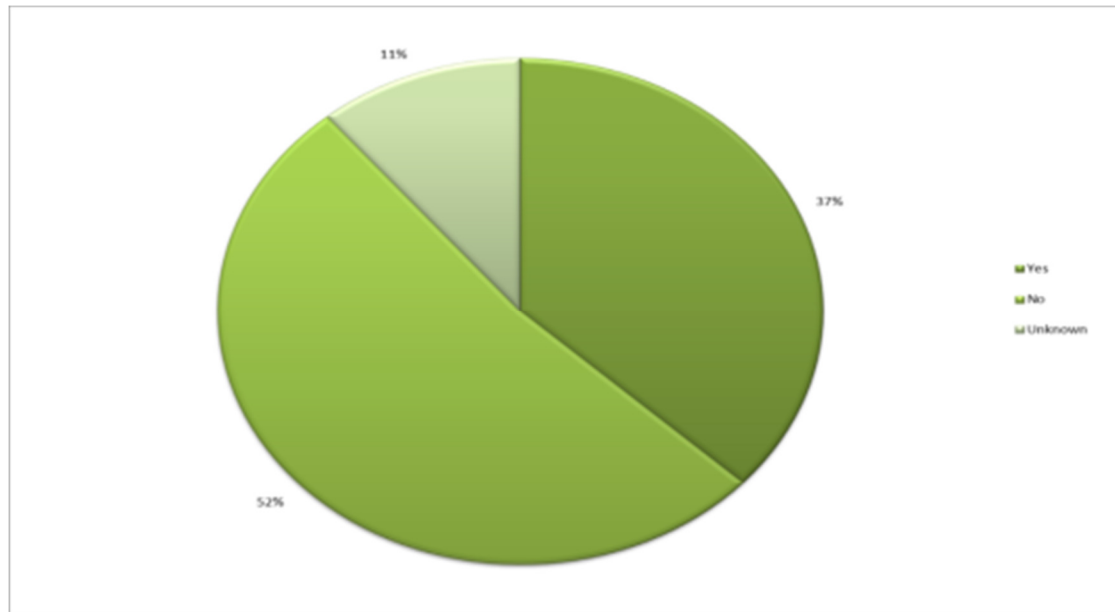


Figure 5. Repeat offenders where seizures were made

Base: All premises with seizures (209)

6.9 Authorities where no seizures were made during Operation Henry

Seventeen per cent of authorities (or 14 out of the 81 who participated in Operation Henry) reported that they made no seizures. Sixty four visits were undertaken by these authorities.

Authority	Region
Blackburn with Darwen	North East
Brighton and Hove	South East
Gateshead	North East
Hackney	London
Islington	London
Poole	South West
Plymouth	South West
Solihull	West Midlands
Southwark	London
Telford and Wrekin	West Midlands
Walsall	West Midlands
Wandsworth	London
Warwickshire	West Midlands
York	Yorkshire and the Humber

Table 6: Authorities reporting no seizures during Operation Henry

6.10 Media interest arising out of Operation Henry

An assessment of media coverage reveals a total of fifty positive stories published between June and November 2015. The coverage arises either directly from reporting the outcomes of Operation Henry or indirectly where the Operation is referred to in relation to other illicit tobacco activity undertaken by the trading standards service. Examples of press headlines may be found at Annex 7.

7 Limitations of the study data

At the commencement of the Operation each participating authority was provided with guidance in relation to the description of each category of illicit tobacco that might be encountered during searches. This guidance was produced by HMRC and may be found at Annex 7.

Whilst every effort has been made to standardise the approach made to categorising the seized product, it is acknowledged that there is scope for error particularly between some of the lesser known legitimate brands (i.e. those with trade marks) and illicit whites. There are two significant reasons for this: 1) the illicit market is changing constantly and thus it is operationally difficult to keep abreast of new products particularly in the absence of a central reference source and perhaps a more fundamental issue 2) there is more than one definition in usage for the term illicit white.

The data as submitted by the regional coordinators has been reviewed, and as far as possible, cleansed and coded in line with information provided by HMRC.

8. Conclusions

The following conclusions are made:

Illicit tobacco is widely available in a variety of forms across England; the detection of such is a specialised activity and requires the expertise of tobacco detection dog search teams working in partnership with Local Authority Trading Standards teams. The work is underpinned by the need for local and regional intelligence identifying where this illegal activity is taking place.

Intelligence sources are many and varied; this Operation was enhanced by the provision of mapping data provided by HMRC, in some cases local searches were carried out in conjunction with HMRC officers, but this was not the norm.

There were few large seizures of product, with most being below 5000 sticks. Over one third of the businesses were described as “repeat offenders” suggesting that the Operation (and resulting seizures) was effective in disrupting supply at local level but is unlikely to be successful in eliminating the problem in the longer term. Qualitative feedback suggests that larger volumes of illicit tobacco stock are often held away from the retail premises (self-storage, private flats, vehicles) making it relatively quick and easy for restocking to take place after the seizure. The data collected by each local authority will be invaluable as a source of future intelligence for both Trading Standards and HMRC.

At this stage it is too early to state the likely outcomes of legal action taken by the Local Authority Trading Standards services.

The Operation 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 (£753,499 evaded duty).

9. Recommendations

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

1. That the outcomes of Operation Henry are publicised as widely as possible by TSI; highlighting the widespread availability of illicit tobacco products and the impact that such availability has on local communities. In addition to the partners in the collaboration (DH , HMRC) this will also include the Local Government Association, Public Health England and Directors of Public Health
2. That data regarding the legal outcomes of the seizures to be collected via the TSI Tobacco Control Survey 20141-5 and further publicity arranged as a result of this data collection
3. That all “raw data” is provided to HMRC for future intelligence sharing purposes
4. That an evaluation of Operation Henry is carried out and findings reported to the Department of Health within two months of the publication of this report
5. A review is made of the sanctions available to Local Authority Trading Standards where repeat offenders are encountered ; this will involve discussion with HMRC
6. Consideration is given to running a second Operation in 2015 that builds on the learning and successes of Operation Henry 2014.

Acknowledgements

The author is grateful to colleagues at the DH, HMRC, TSI, TS regional coordinators, members of the Tobacco Focus Group and the numerous trading standards professionals who undertook the searches across the country. Grateful thanks also to Liz Spratt, Myriad Research.

Annex 1 Participating Authorities in each region

Trading Standards Region	Local Authority	Seizures made
London	Newham	✓
	Richmond	✓
	Barking & Dagenham	✓
	Lambeth	✓
	Southwark	X
	Hounslow	✓
	Tower Hamlets	✓
	Camden	✓
	Islington	X
	Wandsworth	X
	Hackney	X
North West	Blackpool	✓
	Salford	✓
	Rochdale	✓
	Warrington	✓
	Oldham	✓
	Blackburn & Darwen	X
	Wigan	✓
	Manchester	✓
Eastern	Hertfordshire	✓
	Thurrock	✓
	Southend	✓
	Norfolk	✓
	Luton	✓
	Bedford Borough	✓
	Cambridgeshire	✓
	Peterborough	✓
	Essex	✓
East Midlands	Lincolnshire	✓
	Derby City	✓
	Derbyshire	✓
	Nottingham City	✓
	Nottinghamshire	✓
	Leicester City	✓
	Leicestershire	✓
	Northamptonshire	✓
South West	Borough of Poole	X
	Plymouth City council	X
	Bristol City Council	✓
	Gloucestershire	✓
	Dorset	✓
	Wiltshire	✓
North East	North Tyneside	✓
	Hartlepool	✓
	South Tyneside	✓

	Newcastle	✓
	Northumberland	✓
	Middlesbrough	✓
	Darlington	✓
	Durham	✓
	Gateshead	X
Yorkshire & Humber	West Yorkshire Joint Services	✓
	Hull	✓
	North East Lincolnshire	✓
	Sheffield City Council	✓
	West Yorkshire – Leeds	✓
	West Yorkshire – Bradford	✓
	North Lincolnshire	✓
	City of York	X
	Barnsley	✓
	Doncaster	✓
	Rotherham	✓
South East	Brighton & Hove	X
	East Sussex	✓
	Oxfordshire	✓
	Reading	✓
	Slough	✓
	Surrey	✓
	Kent	✓
West Midlands	Birmingham	✓
	Coventry	✓
	Herefordshire	✓
	Sandwell	✓
	Shropshire	✓
	Solihull	X
	Staffordshire	✓
	Stoke on Trent	✓
	Telford	X
	Walsall	X
	Warwickshire	X
	Wolverhampton	✓
Total	81 authorities	67 ✓ 14 x

Annex 2 Operation Henry: Dog search teams



Mike Harris



Bertie



Alfie

Bertie - Collie x Spaniel – Adopted from the Blue Cross Rescue

Tobacco Detection Dog – Age: 3 yrs 3 mths

Memorable find: Concealed motorised lift in floor with drinks bottles stacked on top of it and coffee poured inside of it to disguise smell of tobacco

Alfie - Collie x Spaniel – Unwanted Working Dog

Tobacco/Cash Detection Dog – Age: 3 yrs 4 mths

Memorable find: Self-storage unit containing tobacco with dog repellent poured everywhere



Aran Clyne



Buster



Murphy

Buster - Cocker x Springer Spaniel – Unwanted working Dog

Tobacco/Cash Detection Dog – Age: 1 yr 11 mths

Memorable find: motorised panelling behind bookcase revealing tobacco in a void in the wall. Operated via wireless remote

Murphy - Black Labrador – Unwanted Pet

Tobacco Detection Dog – Age 4 yrs 4 mths

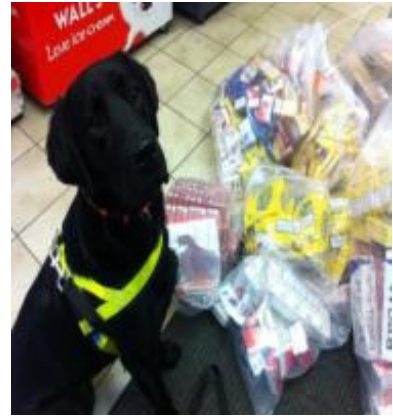
Memorable find: Tobacco concealed inside a large parrot cage (plus parrots), under the litter tray in a compartment



Chris Williams



Milo



Ozzie

Milo - English springer spaniel – Unwanted Pet

Tobacco/Cash Detection Dog – Age: 4yrs 1 mth

Memorable find: Tobacco hidden within dog food boxes

Ozzie - Black Labrador – Unwanted Pet

Tobacco Detection Dog – Age: 4 yrs 1 mths

Memorable find: Tobacco hidden inside a steel security door at the back of the shop



Huw Lewis-Williams



Bradley



Indie

Bradley - English Springer Spaniel – Unwanted Pet

Tobacco Detection Dog – Age: 4 yrs 10 mths

Memorable find: Tobacco concealed within a false wall with chilli powder spread everywhere to disguise the smell of tobacco

Indie - Black Labrador

Tobacco/Cash Detection Dog – Age 4 yrs 10 mths

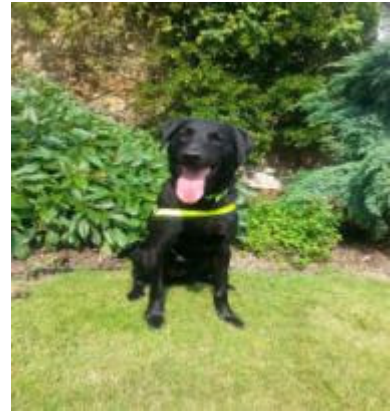
Memorable find: Tobacco in the ceiling, with access via the light fitting



Adam Vizzard



Levi



Meg

Levi - English Springer Spaniel – Unwanted Pet

Tobacco Detection Dog – Age 6 yrs 11 mths

Memorable find: 4 separate self-storage units in the same facility

Meg - Labrador – Unwanted Working Dog

Tobacco Detection Dog – Age: 2 yrs 6 mths

Memorable find: Cigarettes hidden within a compartment in the counter in a shop



Operation “Henry”

Tackling the supply of illicit tobacco:

Locally and Regionally

The following information is provided to assist you with the processes involved with accessing the funded tobacco detection dogs as part of your programme to tackle the supply of illicit tobacco.

This support which covers the cost of the detection dog plus any expenses incurred by the detection team, is provided via the Department of Health. The operation is managed by the TSI. The operation runs from April 2014 – September 2014.

The operation will be evaluated and a composite report produced by TSI at the conclusion of this operation.

Introduction

1. Each region has been provisionally allocated a number of funded days up to a maximum of 8. These days are to be deployed in your region between April 2014 and end of September 2014.
2. You are free to determine when you take advantage of these funded days BUT in accordance with the principles of good enforcement practice, you will want to be in possession of sufficient intelligence to warrant deployment of the detection team in order to make best use of the support on offer.
3. You are advised to plan your use of the funded days as a region (as far as is practicable) and possibly with neighbouring regions in order to get the maximum benefit from this support.
4. The support extends to all costs associated with the hire of the detection team; including travel & subsistence costs incurred by the team.
5. Be patient! The supplier will endeavour to accommodate your request, however there are 9 regions wishing to take advantage of this support, you may need to be flexible with your dates / timings.

Booking process

1. Regional coordinator / or nominated individual is required to email the request to xxxxxx at tobaccocontrol@tsi.org.uk.
2. xxxxx will confirm receipt of the email, record the request and forward to the supplier for action; the supplier will not receive bookings direct from individual authorities or regions unless otherwise agreed with TSI in advance.
3. The Supplier will make arrangements directly with the requesting region for the provision of detection team (and confirm dates with TSI for record keeping purposes)

Record Keeping

1. Each Region will be sent a spread sheet. For each day the detection team are deployed a spread sheet will be completed (total 8 sheets). You will be required to keep a record of your activities in terms of type of premises targeted, type / amount of product seized etc. This will be in a similar form to that required by the annual tobacco control survey.

Additional guidance will be provided in respect of the types of illicit product

2. You are requested to take photographs where seizures are made and it is appropriate to do so. These will be used to illustrate the final report.
3. At the conclusion of the operation (i.e. when all 8 days have been utilised); the regional coordinator or named individual will collate the information for the region and forward this as 1 spread sheet plus a disc / USB of readily identifiable photographs to Jane MacGregor at TSI for evaluation and reporting.

Reporting

1. TSI will report on the overall outcomes of this project; the final report will be made available to the Department of Health, HMRC and Local Authority Trading Standards.

Publicity

1. TSI is preparing a selection of suitable template press releases for your use as appropriate to illustrate the outcomes of this operation. Where possible to do so; regions are encouraged to maximise this opportunity for publicising their work and the support of the DH and TSI. The supplier will also be asked to assist with media enquires as appropriate.

Annex 4 Data collection sheet – indication of variables

Region
Local Authority contact
Date of search
Type of premises
Quantity of Illicit whites seized (sticks)
Main Brands of illicit whites
Counterfeit cigarettes (sticks)
Genuine non UK duty paid cigarettes (sticks)
Counterfeit HRT (KG)
Genuine non UK duty paid HRT (KG)
Raw Tobacco (KG)
Counterfeit Tobacco Packaging/Pouches state number
Shisha (KG)
Smokeless Tobacco (KG)
Country/s of origin if known
Average intended sales price for illicit cigarettes
Average intended sales price for illicit HRT
Has illicit tobacco been seized from this premise before? y/n

Annex 5 Press Template

PRESS RELEASE

DATE

Partnership results in BLANK inspection by trading standards and BLANK sniffer dogs

As the result of a partnership between the Trading Standards Institute (TSI), HM Revenue and Customs (HMRC) and BLANK local authority, tobacco detection dogs have discovered (cigarettes/tobacco including quantity) worth over (£Value if available).

The illicit products were seized during inspection visits/raids in (Local Authority area), conducted by (Local Authority Area) Council Trading Standards (and attended by HMRC officials) during Operation Henry. Operation Henry, which runs from April through September 2014, cracks down on the supply of illicit tobacco across nine regions in England. Each region receives eight days of dog detection provided by Wagtail UK and funded by the Department of Health. The Operation is managed TSI. This partnership allows trading standards officers to identify illicit tobacco 'hot spots' by combining intelligence from HMRC and trading standards.

(Name(s) and breed(s) of dog), provided by (Company e.g Wagtail UK) helped detect the concealed stashes of tobacco at (number of) premises that were visited.

Leon Livermore, chief executive of TSI, said: "This partnership is one more example of how trading standards works with the private and public sector to protect consumers and support legal business practices. Through this partnership, trading standards has a unique opportunity to share information and develop intelligence with the aim of taking illicit tobacco off the streets."

The seizure included (state whether counterfeit/ non-duty paid products if known) which cannot be legally sold in the UK. The visits/raids were conducted as a result of information provided the public.

'HMRC works closely with other enforcement agencies to crack down on illicit tobacco in the UK,' said Richard Las, deputy director of Criminal Investigation for the HMRC. 'Seizing illicit product is only one of the tools used; the focus is on using a range of interventions, from penalties to prosecutions, to encourage compliance and maximise deterrent. Partnership working with Trading Standards is vital in order to share intelligence and collaborate on joint exercises such as Operation Henry to target those areas with the highest levels of illicit tobacco activity.'

(Local Authority Area) Council Trading Standards Manager, (Name), said "(local quote in line

with recommended messaging e.g. “Those involved in dealing in illegal tobacco may be encouraging people, including children to smoke by providing a cheap source. The detection dogs can find tobacco and cigarettes even if hidden in the most unlikely places. Offenders need to know that they will face consequences if they choose to deal in these illegal products.”)

Notes for Editors:

For further information or to arrange an interview please contact the TSI press office on 0845 608 9575 or pressoffice@tsi.org.uk

Trading Standards Institute (TSI)

TSI is a training and membership organisation that has represented the interests of the Trading Standards profession since 1881 nationally and internationally. We aim to raise the profile of the profession while working towards fairer, better informed and safer consumer and business communities.

TSI’s members are engaged in delivering frontline trading standards services in local authorities and in businesses.

www.tradingstandards.gov.uk

Annex 6 Photographic examples of illicit product seizures



1. TSSE seizure site



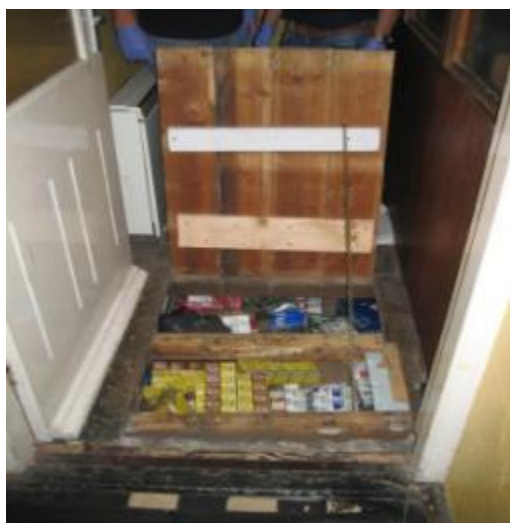
2. SWERCOTS seizure site



3. CENTSA seizure site



4. CENTSA seizure site



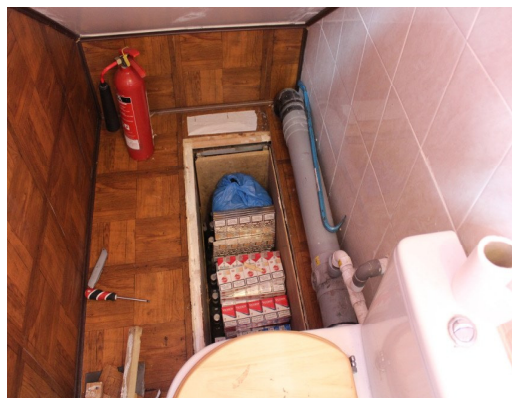
5. EETSA seizure site



6. EETSA seizure site



7. TSNW seizure site



8. TSEM Seizure site



9. Y&H seizure site



10. TSNE seizure site

Image number	Description
1	Product hidden in centre of trays of packed drinks
2	Within empty molasses drum
3	Shisha tobacco inside an oven
4	Under the stairs (previously carpeted)
5	Under the floor boards
6	Inside the top of a stool
7	Inside a photo copier
8	Under the floor in the toilet cubicle
9	In Health Lottery card boxes
10	Inside the shell of a door

Annex 7 Guidance to assist in the identification of illicit product

The following guidance is provided by HMRC to assist in the correct identification of tobacco products and the completion of the data return.

Description	Guidance
Illicit White Cigarettes	Cigarettes produced entirely independently of the International Tobacco Manufacturers (ITMs) that, crucially, have no true, or a very limited, legitimate market. Effectively, cheap whites are brands manufactured for smuggling. Examples include “Jin Ling”, “Fest”, “Richman” and “Bon”.
Counterfeit Cigarettes	Product that is manufactured illegally and sold by a party other than the ITM trademark owner (e.g. “Marlboro”, “Benson & Hedges”)
Genuine Non-UK Duty Paid Cigarettes	Brands that have a legal, legitimate market in the UK however have been smuggled into the country from another location without the any or all of the required Excise/Tobacco Duty having been paid.
Counterfeit Hand-Rolling Tobacco	Product that is manufactured illegally and sold by a party other than the ITM trademark owner (e.g. “Golden Virginia” and “Amber Leaf”).
Genuine Non-UK Duty Paid Hand-Rolling Tobacco	Brands that have a legal, legitimate market in the UK however have been smuggled into the country from another location without the any or all of the required Excise/Tobacco Duty having been paid.
Raw Tobacco	Unprocessed, raw or “loose leaf” tobacco that is smuggled into the UK for the purposes of processing into illicit tobacco products (e.g. in combination with counterfeit tobacco pouches).
Counterfeit Tobacco Packaging/Pouches	Empty packaging and pouches that is manufactured illegally and sold by a party other than the ITM trademark owner (e.g. “Marlboro”, “Benson & Hedges”, “Golden Virginia” and “Amber Leaf”).
Shisha	Refer to NTPD at: www.ntpd.org.uk
Smokeless Tobacco	Refer to NTPD at : www.ntpd.org.uk
Other	Tobacco product for oral use e.g. Makla Bouhel

Annex 8 Examples of Press Headlines

Dogs sniff out illegal cigarettes hidden behind toilet in Boston shop

Dogged detectives sniff out illegal cigs and booze in raids on Rochdale stores

Detection dogs uncover illegal cigarettes and tobacco in city raids

Illegal tobacco seized from Stevenage shop as operation nets supplies worth £6,400

Sniffer dogs pounce on illicit tobacco in Bradford and Leeds

Illegal tobacco seized in Northamptonshire

Sniffer dogs root out illegal tobacco from shops in Luton

Sniffed out: Three specialist Labradors find thousands of illegal cigarettes during raids

More than 4,000 packets of illegal cigarettes seized in Northamptonshire police raids

South West: Trading Standards use dogs to sniff out illegal cigarettes

Super sniffer dog brought in to hunt out Tyneside's illegal tobacco

Sniffer dogs have a nose for trouble

Derbyshire sniffer dogs discover 25,000 fake cigarettes

Sniffer dog hunts out illegal tobacco in Newcastle shops and off-licences

Thousands of illegal cigarettes seized from two Middlesbrough shops

Partnership results in tobacco seizures by trading standards and Wagtail sniffer dogs

07/07/2014 - Trading Standards use dogs to sniff out illicit tobacco

Tobacco seized by trading standards and sniffer dogs

