

**London Boroughs of Brent & Harrow  
Trading Standards Joint Advisory Board  
5 November 2025  
Report from the Senior Service Manager**

**FOR INFORMATION**

**OPERATION CECE UPDATE REPORT**

**1.0 Purpose of the Report**

- 1.1 The purpose of this report is to provide members with an update of Operation CeCe (Op CeCe), a National Trading Standards (NTS) initiative in partnership with His Majesty's Revenue & Customs (HMRC) to tackle illegal tobacco.

**2.0 Recommendations**

- 2.1 That Joint Advisory Board Members consider the report and make recommendations or comments where appropriate.

**3.0 Details**

- 3.1 Op CeCe commenced in January 2021 with the aim of tackling the sale and supply of illicit tobacco products such as cigarettes, hand rolling tobacco and shisha. The objective behind this is for the disruption of illegal tobacco within England and Wales. HMRC provided funds to NTS to carry out this work, and funds were allocated to London Trading Standards (LTS) on a regional level to take part in the project.
- 3.2 The Standardised Packaging of Tobacco Products Regulations 2015 states that certain tobacco products such as cigarettes packs and hand-rolling tobacco are required by law to be in a standardised packaging such as the shape, colour (specifically a non-shiny drab pantone colour) and prohibits the use logos and promotional graphics.
- 3.3 The Tobacco and Related Products Regulations 2016 lays down the requirements of 'the health warnings' needing to be in a prescribed format and in English.
- 3.4 Selling or the intention of selling tobacco products that do not comply with these regulations is a criminal offence and not only are the goods subject to seizure but the supplier may face prosecution. If found guilty a maximum imprisonment of up to two years and/or an unlimited fine per offence could be imposed. If illegal tobacco is found on a licenced premises it could also lead to a representation to review the licence being made.

- 3.5 Furthermore Trade Marks Act 1994 makes illegal to have in possession for supply tobacco packs that have not been produced with the permission of the owner of the relevant trademarks displayed on the packs. If found guilty a maximum imprisonment of up to ten years and/or an unlimited fine per offence could be imposed
- 3.6 As the main focus of Op CeCe is for the disruption of illegal tobacco trade nationally, Local Authorities Trading Standards such as ours were able to make application to LTS to help fund work being carried out at a local level. The funding is purely for disruption work which involves test purchasing and tobacco enforcement days with sniffer dogs. The funding does not cover the cost of investigations or prosecutions and does not cover under age test purchase operations.
- 3.7 Within the period commencing March 2021 and September 2025, Brent and Harrow Trading Standards applied to LTS for such funding to help tackle this issue within our boroughs. The majority of work undertaken by this Service was in relation to test purchasing to prove the supply of illicit tobacco and sniffer dog enforcement days.
- 3.8 Acting on intelligence and complaints received from members of the public, business owners, the police and/or other sources, Trading Standards officers have carried out 184 enforcement visits to businesses to check compliance.
- 3.9 More than 480,580 sticks (24,000-unit packs) of illegal cigarettes, 10kg of hand rolling tobacco, 23kg of smokeless tobacco and 115kg of shisha products have been seized from the enforcement visits. To date 63 letters of warnings and 10 simple cautions have been issued to business owners, companies and/or its directors and 24 cases have been concluded in court following legal proceedings with more expected in the coming year. The concluded cases have resulted in fines collectively exceeding £38K and costs of £25K.
- 3.10 Being very much intelligence led, Op CeCe has been worthwhile due to the Service concentrating its efforts and resources on businesses it has received reports about.

#### **4.0 Financial Implications**

- 4.1 The staffing resource to implement this will be met from within the Trading Standards base budget.

#### **5.0 Legal Implications**

- 5.1 There is no legal implications arising from this report.

#### **6.0 Equality Implications**

- 6.1 The proposals in this report have been screened to assess their relevance to equality and were found to have no equality implications.

#### **7.0 Consultation with Ward Members and Stakeholders**

7.1 There is no requirement to specifically consult Ward Members about this report as it affects all wards across both Boroughs.

## **8.0 Human Resources Implications**

8.0 There are no significant staffing implications arising from this report.

### **Contact Officer**

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