





## Trading Standark Was No Lest 20%

Protecting Wales, Empowering Communiues, Strengthening Oth Economy

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#### **Contact Us**

For more information about this manifesto or to discuss how Trading Standards can support your priorities, contact Trading Standards Wales via our website: <a href="https://www.tradingstandards.gov.wales">www.tradingstandards.gov.wales</a></a>

Published by Trading Standards Wales, representing the 20 local authority Trading Standards services across Wales

### Fareword

Trading Standards teams across Wales deliver exceptional public value. Every day, 294 officers protect consumers, uphold fair markets, and support businesses to thrive. In 2024–25, they prevented over £43 million in consumer detriment on a budget of just £15.5 million - clear evidence of efficiency and impact. Yet these achievements conceal a service operating at its limits after years of funding cuts that have halved the workforce and strained capacity.

As Chair of Trading Standards Wales, I have seen the determination and ingenuity that sustain this vital work: officers intercepting illicit goods, bringing cowboy builders and rogue traders to justice, dismantling organised crime groups, and removing unsafe products from the market. Their commitment maintains public safety and market integrity, but dedication alone cannot sustain a service so central to Wales's fairness and economic resilience.

Trading Standards Wales unites twenty local authority services into a coordinated network that enforces standards, shares intelligence, and protects the most vulnerable. However, with 31% of officers over fifty and only 7% under thirty, the profession faces an urgent skills gap. While England and Northern Ireland have benefited from significant government investment in enforcement and workforce development, Wales has received only a negligible level of support, leaving it at a clear disadvantaged in tackling illicit trade and consumer harm. Previous small-scale, short-term funding interventions have offered little lasting value and have failed to address the long-term capacity and resilience issues confronting the profession.

A targeted, multi year investment programme is now essential to rebuild capacity and secure the workforce for the future. Evidence shows that every £1 invested in the service prevents up to  $£12^1$  in consumer and business detriment, generating real social and economic returns. As the 2026 Senedd election approaches, cross party action is needed. Protecting consumers is not partisan - it is a matter of fairness, safety, and public trust.

Trading Standards has protected Wales for generations, now Wales must protect Trading Standards.

#### **Jacqui Thomas**

Chair of Trading Standards Wales

ACTSO Impact and Outcomes Report (Wales) 2023/24



After a decade of budget cuts that have halved local authority Trading Standards capacity in Wales - key to consumer protection, fair markets, and community safety - are stretched thin and face a critical loss of experienced staff, leaving the public at increased risk from scams, unsafe products, and organised crime. Without urgent support and targeted investment, Wales risks losing vital protections for consumers and businesses, but decisive action now will deliver measurable social and economic returns and a safer, fairer Wales for all.

#### Recommendations:

- Restore Funding: Commit an additional £15 million over five years, prioritising public health, product safety, scam prevention, animal welfare, food standards, and business support.
- Ring-Fenced Investment: Guarantee protected funding for key issues:
  - Illicit Tobacco & Vapes (£1-2M/year)
  - Ports & Border Controls (£0.5–1M/year)
  - Consumer Fraud & Scams (£1M/year)
- Workforce Development: Establish a £1-2 million apprenticeship fund to create 50 new places, diversify recruitment, and secure future skills.
- Promote Partnerships: Sustain investment in intelligence-led, multi-agency enforcement and maintain national coordination for animal welfare, crime disruption, and financial crime.
- Economic Integration: Recognise Trading Standards in all local and regional growth plans. Expand Primary Authority business partnerships (target 150–200 by 2030).

**Action Required:** All parties, government, and local authorities must recognise Trading Standards as a strategic investment. Commit to funding, workforce growth, and stronger partnership to protect Welsh citizens and drive economic progress.



### Introduction

Trading Standards officers are the frontline defenders of consumer rights, business integrity, and public safety. across Wales. Every day, 267<sup>2</sup> operational officers work to protect communities from harm, support legitimate businesses to thrive, and uphold fair trading in our marketplaces.

As Welsh political parties develop their manifestos for the 2026 Senedd election, we call on all parties to recognise Trading Standards as a strategic investment in Wales's future not a cost to be minimised, but a service that delivers measurable returns across public health, consumer protection, economic development, and community safety.

Local authority Trading Standards services in Wales operate on an approximate revenue budget of £15.5 million (2024-25), employing 294 full-time equivalent staff, of whom 267 are operational officers.

In 2024-25 alone, Trading Standards services across **Wales prevented over £43** million in consumer detriment<sup>3</sup>. This represents extraordinary value, yet it also tells a sobering story: a service stretched to breaking point after a decade of cuts that have reduced capacity by over 50% in real terms<sup>4</sup>.

<sup>2</sup> Association of Chief Trading Standards Officers (ACTSO) Impact & Outcomes Report (Wales) 2024/25

<sup>3</sup> Association of Chief Trading Standards Officers (ACTSO) Impact & Outcomes Report (Wales) 2024/25

<sup>4</sup> CTSI Manifesto 2024

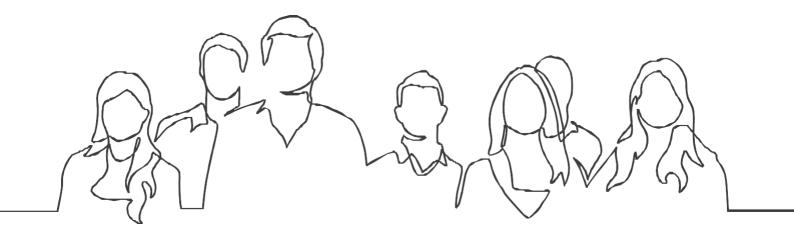
## **About Trading Standards Wales**

The Trading Standards profession was formally established in 1835 with the appointment of the first Weights and Measures Inspectors<sup>5</sup>. From those early inspectors to today's modern enforcement officers, the core mission has always remained the same: protecting fair trade by upholding accurate measurement.

With origins in the Magna Carta, ensuring consistent accurate measures is the foundation of trade worldwide. In modern markets fraught with scammers and artificial intelligence eroding confidence and trust, the accuracy and fairness of measurement is taken for granted, despite 'short measure' being the original fraud in its most basic, simplest forms. Whether its heating oil/coal deliveries, petrol pumps, retail scales, a pint of lager or prepacked foods, Trading Standards are the sole front line UK regulator for ensuring accuracy of all weights and measures for trade, safeguarding both consumers and honest traders from fraud and protecting the UK economy.

Evolving from its origins in weights and measures inspection, Trading Standards is now a modern, multifaceted public protection service, responsible for enforcing hundreds of pieces of legislation covering product safety, food standards, animal welfare, fair trading, and consumer protection. However, after a decade of budget cuts, even the most fundamental statutory duty – ensuring fair weights and measures – has become increasingly difficult to maintain<sup>6</sup>.

Trading Standards Wales is a coordinating body representing the 20 local authority Trading Standards services across Wales<sup>7</sup>. It acts as a collective voice and platform for those local authority teams to share information and tackle issues that cross council boundaries. It provides strategic leadership for the trading standards profession in Wales, promoting continuous improvement and collaboration across all local authorities.



<sup>5</sup> Michael Jeffs & Jim Humble, A History of the Trading Standards Institute (The Russell Press, 2014), p11

<sup>6</sup> Annual statutory returns under Section 70 of the Weights and Measures Act 1985

Bridgend Council, Cardiff City Council, and Vale of Glamorgan Council have combined their trading standards and other regulatory services to create "Shared Regulatory Services (SRS)

## Why We Matter to Wales

Trading Standards services in Wales are essential to protecting consumers, ensuring fair markets to support economic growth, and maintaining community wellbeing. Our work safeguards the most vulnerable, supports legitimate businesses, combats organised crime, and advances national objectives in health, fairness, economic growth, and environmental sustainability. Sustained investment is now critical to maintain and strengthen these protections after years of deep budget reductions and workforce decline.

Trading Standards teams operate as the frontline of consumer protection and community safety. We protect vulnerable consumers from rogue traders, fraudsters, and financial exploitation, securing convictions and banning offenders who prey on elderly or isolated residents. By deploying call-blocker technology, welfare interventions, and scam prevention programmes, we reduce financial losses, prevent harm, and lower the wider costs to health, policing, and social care.

We defend public health by removing unsafe and illegal goods, including counterfeit tobacco, vapes, alcohol, food, and children's toys. Through enforcement of food labelling and allergen laws and by prosecuting unsafe retail practices, Trading Standards prevent illness, protect those with allergies, and enhance public confidence in the safety of everyday products. Our targeted operations also disrupt organised crime and reduce harm from unsafe and illicit trade affecting young people.

In addressing poverty and inequality, Trading Standards ensure fair fuel and food practices that protect low-income households from exploitation. Our checks on heating fuel accuracy and food bank safety oversight ensure essential goods are delivered fairly and safely.

We also promote animal health and welfare through enforcement against illegal breeding and unsafe pet food production, while supporting climate and environmental goals through the enforcement of single-use vape bans and energy-efficiency regulations in the rented housing sector - cutting emissions and reducing energy costs for tenants.

Trading Standards in Wales lead nationally significant investigations, including Operations Thor and Grinch, which dismantled large-scale illegal vape and counterfeit toy networks. These actions recovered criminal proceeds, safeguarded Welsh consumers, and protected the integrity of UK markets.

Despite operating with budgets cut by more than half in real terms and an aging workforce, Trading Standards services continue to deliver exceptional results. Our key outcome in 2024-25:

## **Key Outcomes**<sup>3</sup>:



£43,076,477

in consumer detriment prevented over the last 12 months



835,413

individual illegal products seized (unsafe, counterfeit, misdescribed)



£8,300,000

total value of products seized



£14 million

Secured through court orders requiring defendants to repay proceeds of crime



7,080

scam victims received protective interventions



33,474

reports received from members of the public and enforcement partners<sup>9</sup>



£295,319

in court compensation secured for victims



**£212,965** 

in court costs awarded



1,108

direct business advice responses provided



18,644

business visits where compliance was achieved

These figures demonstrate that for every £1 invested in Trading Standards it generates approximately £12 in prevented detriment.

Our work builds safer, fairer, and more sustainable Welsh communities. Ongoing and multi year investment is vital to preserve this national network of local protection, secure future capacity, and ensure the continued delivery of fairness, safety, and justice across Wales.

This manifesto calls on all political parties to endorse four strategic themes for Trading Standards:

- Theme 1 Long-term Funding: Building Resilience After a Decade of Cuts
- Theme 2 Workforce Development: Securing the Next Generation
- Theme 3 Prevention and Partnership: Delivering When Funded
- Theme 4 Economic Integration: Supporting Growth and Fair Markets

<sup>8 2024-25</sup> Association of Chief Trading Standards Officers (ACTSO) Report

<sup>9</sup> The Citizens Advice Consumer Service handle initial enquiries about consumer rights, including faulty goods and services on behalf of all local authority Trading Standards Services in Wales, England and Scotland. It is a government-funded service offering free information and advice.



# Theme 1:

Long-term Funding -Building Resilience After a Decade of Cuts



#### **What Trading Standards Needs from the Parties**

Over the past decade, Trading Standards services across Wales have seen budgets cut by more than 50% in real terms. Today, the service operates on approximately £15.5 million annually, stretched across 20 local authority teams serving all of Wales. This erosion of funding has forced services to move from proactive prevention to reactive, intelligence-led enforcement and crisis management, responding to the most urgent threats while lacking capacity to address emerging harms.

Despite these constraints, Trading Standards prevented over £43 million in consumer detriment in 2024-25 alone. Research consistently shows that every £1 invested in Trading Standards prevents up to £12 in consumer and business harm. Yet without adequate funding, this protection reaches only a fraction of those who need it<sup>10</sup>.

Trading Standards services in Wales is at a crossroads. Without urgent investment, we risk losing the expertise and capacity essential to protecting Welsh citizens and businesses. Yet with proper support, we can expand our reach, prevent crises before they occur, and build a fairer, safer Wales for all.

#### The Workforce Crisis

Wales faces a critical trading standards workforce challenge:

- Only 7% of the trading standards profession in Wales were aged 30 or younger in 2021
- 31% were over 50 and approaching retirement
- The workforce is depleting due to retirement with no sustainable pipeline of new talent
- Without urgent investment, Wales risks losing the expertise essential to protecting consumers and businesses

#### **Missed Funding Opportunities**

Trading Standards services in Wales has missed out on significant UK Government funding ring-fenced for English and Northern Irish authorities.

When England received £10 million for Trading Standards to tackle illegal tobacco and vapes – including £5 million for up to 90 apprentice enforcement officers – Wales has yet to receive similar funding<sup>11</sup>.

In 2020/21, the UK Government provided Northern Ireland Trading Standards service £1.4 million fulfil new obligations under the Northern Ireland protocol and Windsor framework. This was used to increase staff capacity by 30%<sup>12</sup>. This two-tier system leaves Welsh consumers with less protection than their counterparts elsewhere in the United Kingdom.

We need urgent recognition of these funding pressures and a long-term, fair, and sustainable funding plan that restores approximately half the capacity lost over the past decade and enables Trading Standards to move from firefighting to strategic prevention.

<sup>10</sup> CTSI Manifesto 2024

<sup>11</sup> Note: Wales and Scotland received no allocation from this £10 million package.

https://www.gov.uk/government/news/more-officers-on-streets-to-smoke-out-illicit-tobacco-and-vapes

<sup>12</sup> CTSI Manifesto 2024

#### What We Want to See Happen

Welsh Trading Standards services need an investment of £15 million over the next five years to restore essential, core capacity across priority enforcement areas including product safety, public health protection (including illegal tobacco and vapes enforcement), animal health and welfare, food standards, fraud and scams prevention, protecting vulnerable consumers, and business support.

This investment would enable the service to achieve workforce parity with other similar local authority regulatory services in Wales, such as Environmental Health, which operates with 528 officers<sup>13</sup> - double that of trading standards - ensuring consistent regulatory protection for Welsh citizens and businesses.

#### This investment would:

- Strengthen enforcement capabilities to address emerging threats including online scams, counterfeit goods, and fraudulent environmental claims
- Improve protection for vulnerable residents disproportionately targeted by rogue traders and scammers
- Prevent up to £335.5 million in harm to Welsh citizens and enterprises, based on established return-on-investment ratios

Additionally, ring-fenced funding for the following is essential for critical enforcement priorities where Welsh consumers face significant harms:

- Illicit Tobacco and Vapes (£1-2 million annually): Wales faces a growing public health crisis
  from illegal tobacco and vaping products. Despite Trading Standards conducting over 25 major
  enforcement operations between 2022 and 2025, demand far exceeds capacity. Ring-fenced
  funding would support test purchasing programmes, court proceedings for closure orders,
  secure storage of seized goods, and intelligence-led operations targeting criminal supply
  networks.
- Ports and Border Controls (£0.5-1 million annually): Welsh ports including Holyhead,
  Newport, and Swansea serve as critical entry points for goods. National data shows 45%<sup>14</sup>
  of imported products examined at UK ports are unsafe or non-compliant. A single seizure by
  Anglesey Trading Standards at Holyhead in 2024 recovered 54,560 illegal vapes worth over
  £750,000. Enhanced port enforcement would protect Welsh consumers and businesses from
  dangerous imports.
- Consumer Fraud and Scams (£1 million annually): Vulnerable adults face escalating
  financial exploitation. Ring-fenced funding would expand protection programmes like
  Carmarthenshire's trueCall® initiative, which prevented £184,554 in losses by providing callblocking technology to at-risk residents. Additional funding would support collaboration with
  banks to secure refunds for fraud victims and expand illegal money lending enforcement.

These investments must be ring-fenced and protected - explicitly designated for Trading Standards and shielded from absorption into general local authority budgets. When funding is ring-fenced, as demonstrated, it delivers transformative results through sustained capacity building, strategic recruitment, and integrated partnerships.

<sup>13</sup> Local Government Association Capacity Survey 2023

<sup>14</sup> CTSI Manifesto 2024



# Theme 2:

Workforce Development -Securing the Next Generation



#### **What Trading Standards Needs from the Parties**

The Trading Standards service in Wales faces a critical demographic crisis. Only **7%** of the workforce is aged **30** or younger, whilst **31%** are over **50** and approaching retirement<sup>15</sup>. Without urgent intervention to recruit and train the next generation, Wales will lose decades of accumulated expertise essential to protecting consumers and supporting businesses.

This challenge is compounded by the complexity of modern enforcement. Today's Trading Standards officers must navigate digital marketplaces, cryptocurrency fraud, sophisticated counterfeiting operations, cross-border crime networks, and rapidly evolving product safety regulations. The profession demands continuous learning and adaptation - yet there is no sustainable pipeline of new talent entering the service.

Other UK nations have recognised this crisis and acted. England invested £5 million to establish 90 Trading Standards apprentice enforcement officers. Northern Ireland's £1.4 million investment increased capacity by 30% through recruitment of 24 additional staff members and 16 trainees. Wales has been left behind, with no equivalent dedicated apprenticeship funding received yet despite facing the same workforce challenges.

We need a dedicated Apprenticeship Fund and sustained workforce development investment to ensure the Trading Standards service remains capable of protecting Welsh communities for decades to come.

#### What We Want to See Happen

A dedicated Apprenticeship Fund of £1-2 million over five years to establish up to 50 apprenticeship places across Wales, creating a structured pathway into the profession for young people in all regions and communities.

This investment would:

- Fund development and delivery of a Level 4 Regulatory Compliance Apprenticeship scheme tailored to Welsh needs
- Provide resources for backfill and mentor time, ensuring apprentices receive high-quality training without depleting operational capacity
- Support shared apprenticeship arrangements across local authority consortia, enabling smaller authorities to participate
- Ensure bilingual Welsh-English delivery that strengthens Welsh language skills within the profession

The benefits extend beyond immediate recruitment:

- Sustainable workforce pipeline to replace retiring staff and maintain institutional knowledge
- Increased diversity that better reflects the communities Trading Standards services serve
- Enhanced capability to address emerging challenges including digital enforcement, fraud prevention, and product safety in the digital economy
- Structured mentoring that preserves vital expertise through knowledge transfer from experienced officers to new recruits

Workforce development investment represents both a jobs creation programme for young Welsh people and a strategic necessity for maintaining consumer protection capacity. Without it, Wales risks a skills gap that will take a generation to rebuild.



# Theme 3:

Prevention and Partnership -Ring-Fenced Investment for Critical Enforcement Priorities



#### **What Trading Standards Needs from the Parties**

Beyond the restoration of core capacity and investment in workforce development, Trading Standards services in Wales need dedicated funding for specific enforcement priorities where Welsh consumers and businesses face significant harms. Currently, Wales has consistently missed out on ring-fenced UK Government funding for these critical areas. Whilst Barnett consequentials are received for some UK programmes, these funds are not protected for Trading Standards services and may not reach frontline enforcement, creating a two-tier system where Welsh consumers receive less protection than their counterparts elsewhere in the United Kingdom.

The most compelling evidence for Trading Standards investment comes not from theory but from proven success. When Trading Standards receives targeted government funding, the results are transformative, measurable, and national in scope.

Three flagship initiatives demonstrate unequivocally that strategic investment delivers exceptional outcomes: the **Animal Licensing Wales Project** (funded by Welsh Government), **Wales Illegal Money Lending Unit** (funded by UK Government), and **Operation CeCe** (funded by HMRC). These programmes exemplify the multiplier effect of investment - modest funding enables coordinated action that delivers outcomes far exceeding what individual authorities could achieve alone.

Yet without sustained, ring-fenced funding, these successes remain isolated examples rather than the standard operating model. The Trading Standards service in Wales delivers extraordinary results despite resource constraints, but much more could be achieved with adequate investment in prevention and partnership working.

We need recognition that prevention is more effective and cost-efficient than crisis response, and that Trading Standards teams, when properly funded, prevents harms that would cost billions to address after failures occur.

#### What We Want to See Happen

The evidence from ring-fenced funding in Wales demonstrates the transformative potential of the investment priorities outlined in this manifesto. These examples show that Welsh Trading Standards services are not incapable - rather, they have been systematically under-resourced whilst facing identical statutory responsibilities and expectations as services in other nations. When funding aligns with need, the results are compelling.



## Case Study 1: Animal Licensing Wales -Building National Capacity Through Welsh Government Investment

The **Animal Licensing Wales (ALW) Project** represents one of the most successful examples of Welsh Government investment enabling Trading Standards to deliver nationwide impact. Led by Monmouthshire County Council on behalf of Trading Standards Wales, this initiative has transformed how animal welfare enforcement operates across all 22 Welsh local authorities.

#### The Challenge Before Investment

Prior to the ALW Project, animal licensing enforcement operated inconsistently across Wales. Some local authorities possessed specialist expertise and dedicated capacity; others lacked both. This postcode lottery created enforcement gaps that undermined animal welfare standards, disadvantaged compliant businesses competing against unlicensed operators, and left many councils unable to fulfil statutory obligations under the Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021.

#### **Strategic Investment Creates National Capacity**

Welsh Government funding enabled the creation of a nationally coordinated enforcement team comprising a project manager, eight regional animal licensing officers, two intelligence officers, and support staff. This pooled expertise model ensures that every Welsh local authority - regardless of size or internal capacity - has access to specialist knowledge and enforcement support.

The team operates through a sophisticated intelligence-led model. Rather than waiting for complaints or conducting random inspections, the ALW intelligence function analyses data from across Wales to identify unlicensed breeders, illegal animal sales, and welfare risks. This information is shared with police, the RSPCA, and other enforcement agencies, enabling proactive interventions that prevent harm before it becomes widespread.

#### Measurable Outcomes That Demonstrate Value

Since its inception, the ALW Project has delivered tangible, measurable results:

- Capacity Building: Training delivered across 12 local authorities, with over 60 officers trained and 26 gaining full professional licensing qualifications
- Intelligence-Led Enforcement: 423 intelligence referrals managed, generating 132 formal investigations and 787 inspections of licensed and unlicensed premises
- Direct Enforcement Action: 68 improvement notices issued under the Animal Welfare Act 2006, compelling improvements to animal housing, care, and welfare conditions
- Partnership Working: Integrated collaboration with police, RSPCA, and local authority colleagues creates a unified enforcement network

The effectiveness earned national recognition. In 2024, RSPCA Cymru awarded the project a Special Recognition Award for excellence in enforcement and partnership working. More importantly, the Welsh Government extended funding for 2025-26, recognising that the project delivers measurable value and requires sustained support.

**The Lesson:** Strategic, targeted investment in Trading Standards creates capacity that individual authorities cannot build alone. Modest funding delivers nationwide consistency, professional development, intelligence-led enforcement, and partnership working that protects animals, supports legitimate businesses, and ensures fair competition.



## Case Study 2: Operation CeCe HMRC Funding Disrupts Organised Crime and Protects Public Health

The illicit tobacco and vapes trade undermines public health, fuels organised crime, deprives the Exchequer of tax revenue, and disadvantages legitimate retailers competing fairly. Welsh Trading Standards teams, supported by HMRC funding, have mobilised across the nation to disrupt this criminal enterprise.

Operation CeCe, a national initiative jointly led by National Trading Standards and HM Revenue & Customs (HMRC), demonstrates how external funding enables Welsh Trading Standards to tackle sophisticated criminal networks operating across borders and authorities.

#### **National Scale, Local Impact**

Between 2022 and 2025, Welsh Trading Standards teams alone removed:

- Over 6.8 million illegal cigarettes, nearly 2 tonnes of hand-rolled tobacco (representing a combined total of over £3.1 million in lost taxes)<sup>16</sup>
- Over 376,500 illicit vapes (2023-24) combined street value exceeding £1.1 million

#### **Wales-Wide Mobilisation**

Examples of actions taken by Trading Standards teams as part of Operation CeCe:

- **Isle of Anglesey:** A single seizure at Holyhead in recovered 54,560 illegal vapes with a street value exceeding £750,000, illustrating both the scale of the problem and the effectiveness of targeted enforcement.
- **Swansea Council:** Three-days of coordinated action targeting 14 shops resulted in 9 closure notices; officers seized 971 packs of cigarettes, 970 packets of hand-rolling tobacco, and 2,292 vapes totaling nearly £80,000 in street value. Police made 11 arrests.
- Monmouthshire County Council: A multi-agency operation uncovered a hydraulically operated hidden compartment built into a shop wall a sophisticated concealment method demonstrating the criminal ingenuity Trading Standards must counter. Working with Gwent Police, Immigration Enforcement, and the Operation CeCe Wales Regional Investigation Team, officers dismantled this criminal infrastructure.
- Wrexham County Borough Council & Flintshire County Council: Coordinated operation with North Wales Police, Immigration Enforcement, and the Intellectual Property Office, recovered over 500,000 counterfeit cigarettes, illegal vapes, £10,000 cash, and multiple digital devices used for illicit trade. Evidence gathered during raids was shared with HMRC and Border Force to identify smuggling routes and strengthen national intelligence networks. Wrexham Council secured 5 three-month closure orders, with 4 formal referrals to HMRC supporting wider investigations.

#### The Partnership Advantage

These successes depend on multi-agency collaboration that HMRC funding enables. Local Trading Standards officers work alongside police forces, Immigration Enforcement, HMRC investigators, and specialist resources including tobacco-detection dogs. This coordinated approach tackles complex criminal operations that no single agency could address alone.

Without dedicated funding, Welsh Trading Standards services would lack capacity to participate effectively in these partnerships. HMRC funding provides not just financial resources but also specialist intelligence, legal support, and coordination mechanisms that amplify local enforcement effectiveness.

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#### **Public Health and Economic Protection**

Operation CeCe delivers outcomes across multiple Welsh Government priorities simultaneously:

- Public health benefits: Every illegal cigarette removed cannot harm a young person; every vape shop closure reduces access points for underage purchasers
- Economic benefits: Protects legitimate retailers paying taxes and complying with regulations from unfair competition by criminal enterprises
- Tax revenue protection: Ensures the tax base funding public services is not eroded by smuggling and counterfeiting

The Lesson: When external funding is provided to Trading Standards services in Wales, the service delivers outcomes of national significance. Welsh teams contribute to UK-wide enforcement efforts, disrupt cross-border criminal networks, protect public health, and safeguard economic fairness. Without such funding, these operations would not occur. The contrast is stark: with funding, Wales contributes to national enforcement efforts and protects its citizens. Without it, Wales becomes a haven for criminals displaced from better-resourced areas.



## Case Study 3: Stop Loan Sharks Wales - UK Government funding to tackle illegal money lenders

Stop Loan Sharks Wales is operated by the Wales Illegal Money Lending Unit, hosted by Shared Regulatory Services. Established in 2008 with UK Government funding, the unit employs specialist investigators and client liaison officers to enforce consumer credit, fraud, and money laundering laws - complex enforcement work that individual trading standards services lack the capacity and expertise to undertake independently. This dedicated unit investigates and prosecutes illegal lenders across Wales whilst protecting and supporting victims that have borrowed money from loan sharks.

#### **Measurable Outcomes That Demonstrate Value**

Since 2008, the unit has supported hundreds of people who have suffered because of this crime, and written off hundreds of millions of pounds in illegal debt:

- Over £2,500,000 illegal debt written off
- 347 suspected illegal money lenders identified
- 70,000 suspected number of loan shark victims in Wales
- 932 victims directly supported by the Wales Illegal Money Lending Unit
- 3715 victims identified

Working in partnership with local authorities, the police, advice agencies, charities, and housing providers, they help to raise awareness of the loan shark problem, and work with them to assist those who may be vulnerable to loan shark activity, or may already have been preyed on.

**The Lesson:** Specialised, well-funded units are essential for tackling financial crime. Individual trading standards services lack the capacity and expertise to investigate loan sharks effectively. Stop Loan Sharks Wales demonstrates that dedicated government investment enables successful prosecutions and victim protection, whereas under-resourced local authorities cannot address complex crimes or protect vulnerable people from exploitation.

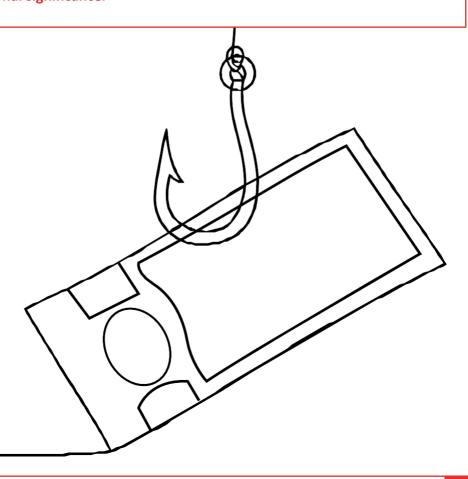
#### **What These Success Stories Mean for Future Investment**

These three case studies provide compelling evidence that strategic investment in the Trading Standards service in Wales delivers measurable, transformative outcomes:

- National Coordination: Funding enables coordinated action across all 22 Welsh local authorities, ensuring consistent standards and eliminating enforcement gaps
- **Specialist Capacity:** Investment builds expertise that individual authorities cannot sustain alone, creating pools of professional knowledge accessible to all
- Intelligence-Led Enforcement: Dedicated funding supports sophisticated intelligence functions that identify risks proactively rather than responding reactively to crises
- Multi-Agency Partnership: External funding provides resources and coordination mechanisms that enable Trading Standards to work effectively alongside police, HMRC, immigration enforcement, and other specialist agencies
- **Measurable Impact:** These programmes deliver outcomes that can be quantified officers trained, premises inspected, illegal products seized, prosecutions secured, welfare standards improved
- **Sustained Commitment:** Success requires not one-time injections but sustained, multi-year investment that enables planning, recruitment, and partnership development

The investment priorities outlined in this manifesto reflect the proven model that Animal Licensing Wales, Operation CeCe and Stop Loan Sharks Wales exemplify.

Provide adequate, sustained, ring-fenced investment, and Trading Standards services in Wales will deliver outcomes of national significance.





# Theme 4:

Economic Integration - Supporting Growth and Fair Markets



#### What Trading Standards Needs from the Parties

Trading Standards services are frequently overlooked in regional growth plans and economic action strategies, despite playing a critical role in enabling fair, safe markets and supporting business growth. This invisibility represents a missed opportunity to harness regulatory expertise as a positive economic enabler.

When markets operate fairly - protected from rogue traders, counterfeit goods, and fraudulent practices - consumer confidence increases, legitimate businesses thrive, and economic activity expands. Trading Standards services deliver this marketplace integrity yet rarely receives recognition within economic development frameworks.

We need explicit recognition that the Trading Standards service is not merely an enforcement service but a cornerstone of economic development - protecting honest businesses from unfair competition, supporting growth through foral business support partnerships (known as Primary Authority partnerships), and building consumer confidence that underpins economic activity.

#### What We Want to See Happen

Wales's Trading Standards service seeks explicit recognition within regional growth plans, economic development strategies, Local Service Board priorities, and future iterations of Prosperity for All. Specifically, this recognition should encompass:

- Trading Standards representation in regional economic partnerships and business support forums
- Acknowledgement of the Primary Authority scheme as a key business support mechanism
- Enhanced collaboration between Trading Standards and Business Wales alongside economic development teams

#### **Primary Authority Partnerships: Regulatory Support That Enables Growth**

Primary Authority Partnerships (PAPs) are formalised agreements between businesses and local authorities that provide assured, tailored regulatory advice on trading standards, environmental health, fire safety, and other regulatory requirements.

Once a business enters into a Primary Authority Partnership, the regulatory advice provided by their Primary Authority must be respected by all other local regulators across England and Wales. This creates certainty: businesses can expand with confidence, knowing their compliance approach is assured and will not be undermined by conflicting guidance from different councils.

Wales currently hosts 81 Primary Authority Partnerships that delivered nearly 1,700 hours of specialised business advice during 2023-24. This represents steady growth from 68 partnerships in 2020-21, demonstrating business confidence in the scheme.

Shared Regulatory Services (SRS) (covering Cardiff, Bridgend, and Vale of Glamorgan) has emerged as Wales's most active and innovative Primary Authority provider, earning recognition from judges who noted: "SRS has made a big impact in a short period of time. Its drive and enthusiasm to offer high quality primary authority services is commendable."

#### To the Benefits to Businesses:

- Legal Assurance: Guidance from Primary Authority must be respected by all other local regulators, eliminating conflicting interpretations
- Single Point of Contact: Businesses work with one Primary Authority rather than managing relationships with dozens of different councils
- Proactive Support: Access to seasoned Trading Standards professionals before problems occur, avoiding costly mistakes and reputational damage
- Cost Efficiency: Investment in specialist advice recoups itself through avoided enforcement action and streamlined regulatory processes

#### **Benefits to Wales:**

- Sustainable Income Generation: Primary Authority is cost-recovery, generating approximately £157,931 for Welsh services in 2024-25
- Business Intelligence: Sustained engagement provides invaluable intelligence on compliance risks and emerging business practices
- Levelling the Playing Field: Ensures genuine compliance becomes the standard, protecting responsible businesses from unfair competition by those cutting corners
- Attracting Investment: Businesses view regulatory support as a key differentiator when choosing where to establish operations. Wales can position itself as the UK's most businessfriendly regulatory environment

#### **Strategic Expansion Opportunity:**

Wales currently hosts 81 partnerships. Strategic investment in promoting and supporting Primary Authority expansion could:

- Double or triple partnerships over five years target 150-200 partnerships by 2030
- Generate an additional £200,000-400,000 annually in cost-recovery income
- Support hundreds more businesses to operate with assured regulatory pathways and reduce the cost of regulatory burdens
- Position Wales as the UK's leading regulatory support environment
- Directly advance Welsh Government economic development and prosperity objectives

This expansion would require modest investment in business development and marketing by Trading Standards services but would deliver returns not only through cost-recovery income but also through broader economic benefits of supporting business growth, attracting investment, and building compliant markets.

### A Call to Action

#### **Workforce Development and Future-Ready Services**

The apprenticeship fund proposed in this manifesto addresses a demographic crisis in the Trading Standards profession. With only 7% of current staff aged thirty or younger, Wales faces imminent loss of expertise unless a structured pathway for young people enters the profession. A £1-2 million apprenticeship investment, compared to England's £5 million and Northern Ireland's £1.4 million, represents both a significant gap and a clear opportunity.

For parties concerned with jobs creation and skills development, this investment delivers visible outcomes: up to 50 new apprenticeship places created over five years, young people trained in a growth profession, and Wales's reputation as a nation investing in workforce development.

#### To the Welsh Government

- Recognise the Trading Standards service as a strategic investment, not a cost. Every pound invested delivers £12 in prevented detriment
- Make the case to UK Government for Wales to receive fair share of ring-fenced funding for priority enforcement areas including tobacco and vapes, ports and borders, and consumer protection
- Ring-fence Barnett consequentials for priority areas to ensure funding reaches frontline services
- Invest in the workforce through dedicated Apprenticeship Fund to build sustainable pipeline of talent
- Embed Trading Standards in economic strategies, regional growth plans, and Local Service Board priorities

#### **To Local Authorities**

- Prioritise Trading Standards in budget decisions and recognise your service's contribution to corporate priorities
- Collaborate regionally to maximise efficiency and capability
- Measure and communicate impact using National Enforcement Priorities framework
- Invest in apprenticeships to build sustainable workforce

#### **To Senedd Members**

- Champion Trading Standards in your constituencies and regions - the service protects your constituents from scams, rogue traders, and unsafe products every day
- Hold Welsh Government to account on funding decisions and ensure Trading Standards receives adequate resources
- Raise awareness of vital work Trading Standards does and the crisis facing the service
- Support cross-party consensus on need for investment in this essential public service

#### To All Political Parties

- Include clear commitments to invest in Trading Standards in your 2026 Senedd election manifestos
- Recognise that Trading Standards operates locally, regionally and nationally and contributes to crosscutting priorities supporting health, economy, crime prevention, and consumer protection
- Commit to ring-fenced funding for priority enforcement areas
- Support workforce development through apprenticeships and training

## Conclusion: Investing in Wales's Future

Welsh local authority Trading Standards services are at a crossroads. After a decade of cuts, the service is stretched to breaking point. Yet the need has never been greater - from tackling illegal vapes harming young people, to protecting vulnerable adults from scams, to preventing unsafe products entering through Welsh ports.

## The Evidence is Clear:



## £12 return for every £1

invested in the service



in detriment prevented in Wales 2024-25



## **142 years**

of prison sentences handed down by the courts to offenders successfully prosecuted



in protecting consumers, supporting businesses, and preventing crises

#### The Choice is Clear:

- Invest now to restore capacity and build sustainable workforce
- Or accept declining capability and increased harm to Welsh communities

#### The Opportunity is Clear:

- With 2026 Senedd election on horizon, all parties can demonstrate commitment to protecting consumers and supporting fair markets
- Parties committing to Trading Standards investment in 2026 manifestos can demonstrate decisive action on issues that directly affect every Welsh household
  - consumer protection, business support, and crime prevention
- Wales can lead the UK in recognising Trading Standards as strategic investment in a well-being economy

#### The Time is Clear:

- Act now before expertise is lost through retirement
- Act now before another crisis exposes gaps in enforcement
- Act now to build and make the Trading Standards service in Wales ready to face the needs and challenges that lie ahead



