



**Intellectual
Property**

APPG for Intellectual Property: IP and Illicit Trade Enforcement

**Addressing emerging threats in
the UK's intellectual property
enforcement landscape**

This report was researched by the Group's secretariat Luther Pendragon, which is paid for by the Alliance for Intellectual Property.

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FOREWORD

Intellectual property (IP) underpins the UK's economic strength, creative leadership and global competitiveness. From the music, film, publishing, sports and design industries to manufacturing and consumer goods, IP-intensive sectors support millions of jobs and generate significant value for the UK economy.

Yet alongside these activities sits a growing and increasingly sophisticated illicit trade that undermines creators and innovation, defrauds consumers and increasingly fuels serious organised crime.

IP crime is no longer confined to isolated acts of infringement. Evidence received by this inquiry shows that it is deeply embedded within organised criminal activity.

The rapid expansion of online marketplaces, social media and small parcel deliveries has enabled these activities to operate at scale, while emerging technologies are further reshaping the threat landscape. As a result, enforcement bodies are under mounting pressure to adapt their approaches and resources to an ever more complex environment.

This inquiry builds on the APPG's earlier work on enforcement. In 2021, the Group published its inquiry into *'Intellectual Property Enforcement'*¹, which identified long standing weaknesses in the UK's response to counterfeiting and piracy, including fragmented responsibilities, declining local enforcement capacity and the growing role of online channels.

1. All-Party Parliamentary Group for Intellectual Property, All-Party Parliamentary Group for IP Report - IP Enforcement 2021.pdf

While good progress has been made since then, the evidence presented to this inquiry demonstrates that the UK's enforcement bodies must adapt responsively to the evolving threats.

The purpose of this inquiry is therefore to identify practical steps to strengthen IP enforcement ahead of the renewal of the Intellectual Property Office's Counter-Infringement Strategy next year.

In doing so, we have examined the effectiveness of existing structures, including the role of specialist units such as the Police Intellectual Property Crime Unit and the contribution of the Intellectual Property Office.

Additionally, we've assessed the current levels of collaboration between government, law enforcement, rightsholders and platforms.

A recurring theme throughout the evidence was the need to move beyond enforcement in isolation, towards a more coordinated approach that prioritises intelligence sharing and following the money that sustains illicit trade.

I am grateful to all the organisations who contributed evidence to this inquiry, and to my fellow APPG members for their continued engagement.

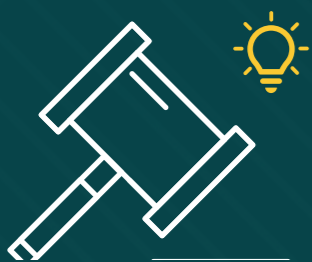
I hope this report provides a constructive contribution to the Government's efforts to tackle illicit trade and IP related crime, and helps ensure that the UK remains a world leader in the protection and enforcement of intellectual property.

Rt Hon Sir John Whittingdale OBE MP

Chair,
All Party Parliamentary Group
on Intellectual Property



CORE RECOMMENDATIONS



Some of the key recommendations from the report include:

- Introducing a mandatory, standardised “Know Your Business Customer” (KYBC) regime across digital infrastructure.
- Embed a “Follow the Money” approach at the centre of IP enforcement.
- Provide PIPCU with stable, multi-year funding and formal recognition as a national policing capability.
- Establish a statutory, UK-wide IP enforcement coordination framework to improve information sharing powers.
- Close enforcement capacity gaps with targeted investment in specialist investigators and digital tools, alongside improved small-parcel border targeting.

ABOUT THE INQUIRY

The inquiry is based on a combination of written and oral evidence collected between January and May 2026:

- The first evidence session considered the changing nature of IP crime and its associated challenges, and took evidence from the British Phonographic Industry (BPI) and the Anti-Counterfeiting Group (ACG).
- The second session considered the Intellectual Property Office’s role in promoting and protecting IP in the UK, and took evidence from three senior officials at the IPO.
- These sessions were supplemented by an APPG visit to the Police Intellectual Property Crime Unit at the City of London Police.
- The APPG received a range of written submissions from representatives of IP intensive sectors, which are cited throughout the report.

Five years ago, the APPG for Intellectual Property published a report on Intellectual Property Enforcement ahead of the development of the Intellectual Property Office’s Counter-Infringement Strategy 2022–2027.²

The report identified a number of reforms that would significantly enhance the UK’s intellectual property enforcement regime and better protect rightsholders of all sizes. These included implementing ‘Know Your Business Customer’ protocols, improving the Intellectual Property Enterprise Court Small Claims Track, and expanding the Intellectual Property Office’s IP Attaché network.

As a starting point, this inquiry assessed the progress made against the APPG’s 2021 recommendations. The APPG has mapped those recommendations against UK Government delivery to date, with the findings set out in the Appendix. This assessment has helped identify areas of progress, highlight remaining gaps, and informed the recommendations contained within this report.

2. Intellectual Property Office, [Intellectual Property Counter-Infringement Strategy 2022 to 2027](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/intellectual-property-counter-infringement-strategy-2022-to-2027.pdf) - GOV.UK

CHAPTER 1: THE CHANGING NATURE OF EMERGING THREATS

CONTEXT

Evidence to the APPG consistently highlighted that the UK retains a strong legislative and policy framework for IP protection. However, witnesses stressed that the threat landscape has changed materially in recent years. The most significant shift is the speed and adaptability of modern infringement, driven by online selling models, evolving logistics and supply routes and new technologies.

The Government's consultation on a new product safety framework³ – published under the powers of the Product Regulation and Metrology Act 2025 – represents the primary vehicle through which updated online marketplace duties are being developed. The consultation marks a significant step forward, particularly in its expectation that marketplaces proactively identify and act against repeat non compliance, and verify seller contact details. The APPG also welcomes the ability to introduce these measures through secondary legislation, and the Bill's broad definition of 'marketplace activity', which should support enforcement efforts.

THE CHALLENGES

Witnesses and written evidence emphasised that contemporary IP crime is increasingly characterised by:

SMALL PARCELS AND “DOMESTIC FINISHING” OF COUNTERFEITS

Witnesses reported a substantial shift towards small parcel distribution, with counterfeit goods increasingly arriving as individual postal packages rather than bulk shipments⁴. This makes detection more difficult because risk is spread across a high volume of low-weight items.

A related tactic described to the APPG is the importation of unbranded or “blank” goods, which do not infringe IP at the point of entry, before branding or completion occurs domestically⁴.

Examples given included:

- Handbags imported with no trademarks or logos.
- Trainers imported without branding.
- perfume bottles imported without liquid or marks.

Finished counterfeits are then distributed through online marketplaces, social media channels, informal supply chains or direct-to-consumer routes.

ONLINE MARKETPLACES AND “DUPE CULTURE”

Counterfeiters increasingly sell through online marketplaces and social media⁵, using paid advertising and influencer-style content to reach consumers at scale. Witnesses explained how this has created a “dupe culture”⁶ among younger consumers. This framing reduces stigma around counterfeit purchasing by presenting imitation as clever consumption, and can blur the line between legitimate lower-cost alternatives and unlawful counterfeits.

Witnesses to the APPG described how counterfeiters exploit weak platform onboarding processes, which often rely on little more than self declared information and basic email verification. This enables sellers to operate at scale using false, misleading or unverifiable identities, significantly undermining enforcement efforts.

Evidence described a set of resilience tactics deployed by counterfeiters to help them survive takedowns and continue trading:

- Closing and reopening accounts under new identities or slightly altered names.
- Advertising on one platform but directing buyers to messaging apps or off-platform checkouts.
- Using multiple small accounts and micro-influencers rather than relying on a single storefront.

ARTIFICIAL INTELLIGENCE

In the creative industries, witnesses highlighted that artificial intelligence is creating new enforcement challenges. In particular, AI-enabled tools can generate content at low cost and at speed, including outputs that imitate identifiable artists, voices or styles⁸.

Witnesses described two main effects:

- Increased volume of potentially infringing material (rapid generation of multiple variants and low barriers to entry).
- Increased plausibility (outputs that more closely mimic recognisable attributes).

LINKS TO SERIOUS ORGANISED CRIME

The APPG heard consistent evidence that IP crime is rarely standalone. Witnesses, including specialist law enforcement and industry bodies, reported that counterfeiting is frequently linked to wider illicit activity, including:

- Money laundering
- Tax evasion
- Modern slavery and human trafficking
- Drugs and weapons supply

Witnesses suggested that counterfeiting can be attractive to organised networks because it offers strong margins and scalable distribution and can be monetised via legitimate-looking online channels.

3. Gov.uk, The UK's new product safety framework - GOV.UK (published 31 March 2026)

4. Chartered Institute of Patent Attorneys (CIPA) (Typeform written evidence)

5, 6. Ibid.

7. Anti-Counterfeiting Group (AcG) (oral evidence, APPG session, 11 March 2026)

8. Arts and Humanities Research Council (AHRC) (Typeform written evidence)

RECOMMENDATIONS

1. The APPG for IP recommends that platform obligations should be developed into a **clear and standardised KYBC framework**. This should require the collection and robust verification of trader identity information, not limited to contact details, and be applied consistently across platforms. It should also be supported by meaningful and enforceable consequences, including the suspension or denial of service for sellers that fail verification or repeatedly infringe.
2. Over time, Government should also consider **extending KYBC principles beyond online marketplaces to other providers of critical digital infrastructure** such as payment services, hosting providers and online advertising platforms where anonymity continues to facilitate illicit trade.
3. Witnesses repeatedly emphasised that IP crime is driven by profit and increasingly linked to serious organised crime, including money laundering and wider illicit activity⁹. The APPG therefore recommends that the Government and enforcement agencies **strengthen and resource a “Follow the Money” approach as a core pillar of the UK’s IP enforcement strategy**. This should prioritise financial investigation, asset freezing and confiscation, and coordinated action with payment providers and other financial intermediaries to deny criminals access to revenue streams.
4. To complement these measures, the APPG notes the **potential for greater use of advanced technological tools to strengthen enforcement**. Machine learning systems may help identify infringing content at scale and could support more coordinated intelligence-sharing between rightsholders, platforms and enforcement bodies, including the IPO and PIPCU. The APPG heard that watermarking, fingerprinting and enhanced digital rights management (DRM) solutions could also improve the traceability and protection of copyrighted works¹⁰, particularly if supported by more consistent standards and interoperable rights data.

CHAPTER 2: OUR WORLD-LEADING ENFORCEMENT AGENCY



ENFORCEMENT INQUIRY VISIT TO PIPCU – APRIL 2026

CONTEXT

One enforcement body working successfully to adapt to the changing nature of IP crime is the Police Intellectual Property Crime Unit (PIPCU) at the City of London Police.

Established in 2013, PIPCU is a dedicated unit to address serious and organised intellectual property crime, including both digital infringement, such as illegal streaming and online piracy, and large scale distribution of counterfeit goods.

Unlike traditional policing structures, PIPCU operates as a standing national capability, rather than a reactive local

function. It undertakes investigations across England and Wales, removing pressure from local forces and ensuring consistency in enforcement.

During an APPG delegation visit to the PIPCU in April 2026, members received detailed operational evidence on the UK’s approach to IP enforcement and the unique model underpinning PIPCU’s effectiveness.

The visit demonstrated how specialist, centrally coordinated enforcement, supported by a public-private funding model, has positioned the UK as an international leader in tackling IP crime.

9. Police Intellectual Property Crime Unit, City of London Police, Transcript of visit session (16 April 2026)

10. British Phonographic Industry (BPI) (Typeform written evidence)

FUNDING AND GOVERNANCE

A defining feature of PIPCU is its funding and governance model, described to the APPG as ‘unprecedented’. The unit is primarily funded by the Intellectual Property Office (IPO), rather than through core Home Office policing budgets, and benefits from targeted support from industry partners. In 2026, the IPO committed a further c.£3 million per annum over the next three years to support PIPCU’s work. This underlines continued government confidence in the unit’s effectiveness. If the next Counter-Infringement Strategy is likewise framed on a three-year basis, as the APPG understands it will be, this would provide a more coherent planning cycle across the life of the strategy.

This separate funding stream allows the unit to remain ring fenced from competing policing priorities, which often limit sustained action against IP crime. Witnesses made clear that this is not simply a funding mechanism, but a structural advantage because it enables the development of deep specialism, continuity of expertise, and strategic focus that cannot easily be replicated within generalist policing.

As a result, PIPCU operates not just as an enforcement body, but as a central coordinating hub connecting rightsholders, intelligence sources, and law enforcement activity. It receives referrals from industry, develops intelligence, and coordinates operational responses in partnership with domestic and international actors. In practice, this gives it leverage across the entire IP crime ecosystem, allowing it to intervene at multiple points including domains, platforms, payment systems, and supply chains.

11. Police Intellectual Property Crime Unit, City of London Police, Transcript of visit session (16 April 2026)

NATIONAL CAPABILITY AND OPERATIONAL IMPACT

Evidence highlighted why PIPCU is able to operate effectively in a challenging enforcement environment. With significant delays in the court system, the Unit has adapted by prioritising financial disruption and infrastructure denial alongside traditional prosecution. PIPCU told the APPG that removing access to funds or operational capability often has a more immediate and deterrent effect than criminal sentencing alone. This includes working with payment providers to identify and freeze illicit flows, as well as coordinating rapid domain suspension or service interruption through trusted partners.

THE DIFFERENCE PIPCU MAKES

The APPG heard that the unit delivers a disproportionate level of impact relative to its size. With a team of approximately 23 staff, PIPCU achieved in the most recent reporting year¹¹:

- 96 warrants executed
- 90 suspects arrested and IUC
- 73 judicial outcomes
- £3.8m in assets frozen/seized
- £3m in assets confiscated/forfeited
- 1083 domains suspended across Op Ashiko and Creative
- 1310 cease and desists issued
- 707 disruptions recorded on APMIS*
- 77 industry referrals of which 70 were accepted for Investigation (91% acceptance rate)

*APMIS Disruptions. The Agency & Partner Management Information System (APMIS) is a UK national database used by police forces & other agencies to record, map and analyse serious and organised crime (SOC) threats, disruption activities and Organised Crime Groups (OCGs).

CASE STUDY: DISRUPTING A COMMERCIAL-SCALE PIRACY NETWORK

- PIPCU recently disrupted an organised illegal streaming service operating nationwide. The service was marketed via social media, with users directed into encrypted messaging channels to purchase subscriptions. Over a 12 month period, investigators identified more than £3 million flowing through associated accounts.
- Coordinated warrants led to multiple arrests and the discovery of a substantial server installation within a residential property, valued in the hundreds of thousands of pounds. Thousands of digital and financial exhibits were seized.
- The operation resulted in the immediate shutdown of the service, cutting off access for users and dismantling a highly profitable criminal enterprise.

A PLATFORM FOR GLOBAL INFLUENCE

Internationally, PIPCU is regarded as a global exemplar. The unit is regularly engaged by foreign governments and enforcement agencies seeking to understand its operating model. It works closely with partners including Europol, Interpol, and US Homeland Security Investigations, and plays a role in multinational operations targeting transnational IP crime networks. Witnesses emphasised that this gives the UK a valuable instrument of influence – not only in enforcement, but in shaping international cooperation and standards.

12. Ibid.

13. Gov.uk, Independent review of police force structures: terms of reference - GOV.UK (published 17 March 2026)

THE CHALLENGES

Despite this performance and recognition, the APPG heard clear evidence that PIPCU is operating below optimal capacity. Several challenges were identified¹²:

- Staffing gaps, with vacancy levels reaching up to 20% in one period.
- Resource constraints limiting the number and scale of operations that can be undertaken.
- Process inefficiencies, particularly around warrant jurisdiction, increasing costs and reducing agility.
- Uncertainty around future funding arrangements, including the complexity of incorporating industry contributions without undermining the core model.

RECOMMENDATIONS

1. The APPG therefore considers that the Government should formally recognise PIPCU as a strategic national capability and **commit to providing stable, multi-year funding** at a level sufficient to eliminate vacancy gaps and enable the unit to operate at full capacity.
2. This recognition should be **reflected in wider policing reform processes**, including the ongoing ‘Independent review of police force structures’ led by Lord Hogan-Howe¹³, to ensure that PIPCU’s role is embedded within future structures and not overlooked.
3. The APPG further **encourages the Intellectual Property Office to actively contribute to these reform discussions** to reinforce the case for PIPCU as a critical component of the UK’s national enforcement capability.

CHAPTER 3: ENFORCEMENT PARTNERSHIPS

CONTEXT

The APPG heard that effective intellectual property enforcement increasingly depends on strong cooperation between government, law enforcement, rightsholders, platforms and other intermediaries. As infringement becomes more digital, more dispersed and more closely linked to wider illicit trade, no single body can tackle the problem alone. The ability to share intelligence quickly and act on it in a coordinated way is therefore becoming more important to the UK's enforcement response.

The APPG also heard that the UK already has examples of this approach working well. In addition to PIPCU, the APPG heard that the IPO's Intelligence Gateway, launched in 2025¹⁴, has begun to streamline and prioritise intelligence submissions from rightsholders and enforcement partners so that cases can be directed to the most suitable route for action¹⁵.



THE CHALLENGES

Despite these positive examples, the APPG heard that the wider enforcement system could be more holistic in its approach. Intelligence is still dispersed across government bodies, enforcement agencies, rightsholders and platforms, and that can make it harder to identify patterns quickly, prioritise action and convert information into coordinated disruption at scale. The APPG heard that the challenge is not simply whether information is shared, but whether it is shared in a sufficiently timely and usable form to support consistent enforcement across the system.

Written evidence highlighted Amazon Brand Registry as one of the more effective examples of platform collaboration with rightsholders. However, the APPG heard that such systems work best where rightsholders maintain valid rights and engage consistently with reporting processes. This suggests that platform-led action can produce results, but that outcomes still depend too heavily on individual rightsholders navigating different private systems rather than on a more consistent enforcement framework.

The APPG also heard that these issues are compounded by limited interoperability between some enforcement and policy bodies, and by weaker cross-border coordination following the UK's exit from EU-wide structures.

RECOMMENDATIONS

1. The APPG considers that the next IPO Counter-Infringement Strategy should support a **more structured UK-wide intelligence-sharing framework and stronger statutory information gathering powers**, building on the intelligence hub that the IPO has developed over the last five years. This should enable intelligence from rightsholders, platforms, Border Force, Trading Standards and police forces to be accessed, shared and assessed more consistently. This will deliver clearer reporting and feedback mechanisms so that intelligence can be directed to the most appropriate route for action, and feedback provided to industry on how intelligence is used and exploited
2. Additionally, **partnership working should extend beyond enforcement bodies and rightsholders to include the intermediaries that facilitate infringement**.
3. **Closer cooperation with payment processors, domain registrars, advertising networks and other actors** would help ensure that enforcement action is directed not only at listings and content, but also at the infrastructure and revenue streams that sustain criminal activity. The APPG recommends that the **IPO could have a powerful convening role in supporting partnership working across the system**. This should include clearer protocols with major platforms. It should improve how repeat infringers are handled. It should also improve how misuse of takedown processes is addressed, including faster reinstatement where claims are not substantiated.
4. The **IPO should also work with platforms and rightsholders to set clearer minimum standards for cooperation**. These should include clear response times, straightforward reporting on takedowns and appeals, and better transparency around errors and misclassification.

14. New intelligence gateway for IP crime submissions - GOV.UK

15. British Phonographic Industry (BPI) (Typeform written evidence)

CHAPTER 4: RESOURCE GAPS

CONTEXT

A consistent theme across both oral and written evidence was that, for many rightsholders, the central issue is not a lack of intelligence or willingness to act. Rather, it is the limited capacity of enforcement bodies to action cases at scale, despite significant private sector investment in monitoring, investigation and evidence gathering.

THE CHALLENGES

1. TRADING STANDARDS

The most frequently cited gap concerned local Trading Standards capacity. Evidence indicates that many services are struggling to maintain basic capability due to workforce depletion and limited recruitment, while resources remain unevenly distributed across local authorities. As a result, proactive investigations are increasingly difficult to sustain, even where intelligence is available.

2. LOCAL POLICING

Witnesses highlighted that IP crime is often not embedded within local policing priorities. Many forces lack dedicated expertise, and IP crime does not consistently feature on risk registers. The consequence is that cases struggle to progress unless they meet high harm thresholds, creating a “middle” of persistent offending that businesses feel

but which rarely reaches enforcement action¹⁶.

3. BORDER INTERVENTIONS

Border enforcement remains constrained by structural limitations. Detection strategies designed for bulk shipments are increasingly challenged by the shift to small parcel distribution, while low inspection rates limit the ability to intercept illicit goods at scale.

4. ONLINE ENFORCEMENT

The online environment requires rapid, intelligence led intervention, yet enforcement bodies often lack the digital tools and interoperability needed to track offenders across platforms and act quickly. As a result, rightsholders face rising monitoring costs and repeated cycles of takedown and re emergence, compounded by inconsistent platform engagement.

The implication for the next IPO Counter-Infringement Strategy is that improvements to coordination alone will not be sufficient unless coupled with a credible plan to increase operational throughput. This requires more trained investigators, better digital tooling, faster routes to disruption, and sustained multi agency mobilisation where problems are geographically entrenched.

CASE STUDY: OPERATION VULCAN

Witnesses identified Operation Vulcan as a particularly effective example of multi-agency enforcement against entrenched counterfeit trade, with lessons for how coordinated action can deliver sustained disruption in known hotspots.

Operation Vulcan brought together around 65 agencies in a problem solving partnership structured around a “clear, hold, build” approach. Reported outcomes were significant. Over 200 counterfeit shops closed, more than 1,000 tonnes of goods seized and repurposed, £520,000 in cash recovered, and substantial reductions in violent crime and wider harm indicators¹⁷. The model has also been recognised nationally and replicated in other locations.

Evidence suggests that its effectiveness derived not simply from the scale of activity, but from the way coordination was structured and sustained.

Key features included:

- Clear governance and sustained coordination across agencies.
- Shared intelligence and joint tasking based on a common operational picture.
- Use of multiple enforcement powers in parallel, including policing, regulatory, immigration and financial tools.
- A focus on sustainment, designed to prevent re-entry and reduce the risk of rapid re-emergence.

Operation Vulcan also demonstrated how enforcement can deliver visible community benefit, including through the safe repurposing, recycling and donation of seized goods where appropriate¹⁸. Its national recognition suggests it should be considered a transferable model rather than a one-off success.

RECOMMENDATIONS

1. The APPG recommends that the next Counter-Infringement Strategy should **prioritise funding for specialist investigators, digital enforcement capability and sustained multi-agency tasking** to tackle IP infringement at a structural level.
2. Witnesses consistently pointed to a mismatch between current enforcement capacity and the modern infringement environment. Border enforcement remains under pressure as illicit trade shifts from bulk consignments to small parcels, online enforcement requires faster digital tools and cross-platform intelligence. Resource planning under the next Counter-Infringement Strategy should therefore be based on current patterns of offending, with **additional investment directed to small-parcel border targeting, digital investigation tools, and faster operational routes for tackling repeat online infringement**.

16. Anti-Counterfeiting Group oral evidence; BPI written evidence

17. Greater Manchester Police, Standing Together: Annual Report 2022/2023

18. BBC, Cheetham Hill: Footage shows £87m counterfeit goods raid - BBC News

CHAPTER 5: THE ROLE OF THE INTELLECTUAL PROPERTY OFFICE

CONTEXT

The APPG heard that the IPO is increasingly prioritising a coordinating role within the enforcement system, rather than acting only as a policy body¹⁹. Witnesses described an organisation that is trying to bring together intelligence, align operational partners and support a more strategic response across policing, Border Force, Trading Standards and rightsholders.

The APPG heard that this reflects a wider shift in the enforcement landscape. Infringement is more cross-border, more digitally enabled and more dependent on gaps between institutions. In that context, the IPO's value lies less in formal powers and more in its ability to convene, prioritise and connect. The APPG also heard that the current strategy has strengthened that role and given the IPO a more visible place at the centre of the system.

The APPG also heard that prevention remains an important part of the IPO's current approach to enforcement. In setting out progress under the existing strategy, the IPO pointed to the delivery of awareness campaigns and the launch of the IP Crime Toolkit alongside operational and coordination activity²⁰. The APPG also heard, in discussion of priorities for the next strategy, that prevention and consumer behaviour change should continue to form part of the overall response, particularly as infringing

goods and content are increasingly encountered through online and social media environments that reduce friction in discovery and purchase.

THE CHALLENGES

The APPG heard that many of the most consequential decisions affecting enforcement now sit beyond the IPO's direct remit. Witnesses pointed to online marketplace regulation, product safety, border policy, policing reform and wider economic crime frameworks as areas that will materially affect enforcement outcomes, even though they are shaped elsewhere in government.

The APPG heard that the IPO is involved in those discussions and provides technical and policy input, but does not itself control them. A good example is the recently announced funding to tackle illicit trade on the high street. Fakes of all shapes and sizes are found on our high streets. We welcome the Home Office commitment to tackle this issue and would hope the IPO are involved in shaping this work to ensure it tackles counterfeiting.

That matters because the success of any future strategy will depend in part on how far IP enforcement is reflected in wider reform. The APPG heard that the IPO's role therefore needs to extend beyond internal coordination and include sustained engagement across government.

The APPG also heard a clear warning against allowing the strategy to become too narrowly focused on counterfeiting and physical goods. While serious organised criminality remains an important concern, witnesses argued that piracy and other forms of digital infringement must not be treated as secondary.

The next strategy should reflect the full range of modern infringement and should not create a false divide between counterfeiting and piracy where the practical enablers, platforms and economic harms increasingly overlap.



ENFORCEMENT INQUIRY EVIDENCE SESSION WITH THE IPO - MAY 2026

RECOMMENDATIONS

1. The APPG recommends that the **IPO use the next strategy to set out a clear whole-system model for IP enforcement**, with an emphasis on leadership, coordination and strategic direction across the enforcement landscape. The APPG heard that this is already the direction of travel, but considers that the next strategy should state unequivocally how the system is meant to function as a whole, what roles different institutions are expected to play, and how coordination will be maintained where no single enforcement body holds overall authority.
2. The APPG recommends that the **IPO give weight to the online and networked nature of modern infringement**.
3. The APPG heard consistent evidence that enforcement must move beyond a “whack-a-mole” approach. **Greater focus should instead be placed on the systems that enable infringement, including platforms, logistics and repeat seller behaviour, as well as on identifying criminal networks operating across multiple channels.**
4. The **IPO should retain its emphasis on prevention and consumer behaviour change within the next strategy**. In the APPG's view, that will be increasingly important as online and social media environments continue to make infringing goods and content easier to find, market and purchase.
5. The APPG recommends that the **IPO strengthen its engagement with the Office for Product Safety and Standards (OPSS) as the Government develops the new product safety framework**. Given the increasing overlap between counterfeiting, online marketplaces and consumer product safety, the IPO should ensure that its enforcement strategy is informed by ongoing discussions with OPSS and that IP enforcement considerations are properly reflected in the design of product safety policy. The APPG has heard that closer IPO-OPSS coordination would help ensure that future online marketplace regulation better supports both consumer protection and effective action against counterfeit goods.

19. Intellectual Property Office (IPO), oral evidence, APPG session, 20 May 2026

20. Ibid.

CONCLUSION

This inquiry has demonstrated that while the UK retains many strengths in its intellectual property enforcement framework, it is operating in a threat environment that has evolved faster than the system designed to address it.

Evidence points to a clear gap between the scale, speed and organisation of modern IP crime, and the capacity of enforcement structures to respond consistently at that same pace.

At the same time, the report highlights examples of best practice, from the impact of PIPCU to the growing role of coordinated partnerships, which show what can be achieved when enforcement is properly resourced, intelligence-led and systematised.

The recommendations set out in this report are intended to support that shift, ensuring that the UK's response remains capable of meeting the challenges of a rapidly evolving landscape.

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Photo of John Whittingdale ©House of Commons/Roger Harris

APPENDIX - PROGRESS OF APPG 2021 RECOMMENDATIONS

APPG FOR IP 2021 RECOMMENDATION	INTRODUCE KNOW YOUR BUSINESS CUSTOMER (KYBC) REFORMS	CONSOLIDATE SMALL CLAIMS TRACK (SCT) GUIDANCE	RAISE THE SCT CAP	ALLOW REGISTERED DESIGNS IN SCT	ABOLISH SCT WRITTEN JUDGMENT FEES
WHY THE APPG CONSIDERED IT IMPORTANT	The APPG argued anonymous illegal operators use UK hosting without identity checks, making piracy, scams, and illegal content hard to stop.	The APPG heard smaller creators find SCT guidance confusing and that inconsistent information prevents access to justice.	The APPG said that £10,000 cap forces creators to choose between losing income or using costly multi-track.	The APPG stressed that SMEs cannot enforce Registered Designs affordably and that many have to resort to public shaming.	The APPG found that fees create a lack of transparency and inconsistent case law.
GOVERNMENT ACTION TO DATE	Cross-government work on KYBC-type protocols is in progress. The IPO is informing Product Regulation and Metrology Act 2025 marketplace regulations through a Government consultation, entitled <i>'Product regulation: market surveillance and enforcement framework'</i> , published on 31 March 2026 and closed on 23 June.	The IPO has developed new user focused guidance, including a <i>'Get IP step-by-step'</i> guide and a forthcoming <i>'Use IP'</i> guide to help SMEs navigate enforcement.	The cap remains at £10,000.	The Government's consultation on reforms to design rights – "Changes to the UK design framework" – published in September 2025, includes "the possibility of extending access to the Intellectual Property Enterprise Courts' small claims track for registered design cases." The APPG is currently awaiting the Government's response to the consultation, but this could make justice more accessible to SMEs.	Paid transcript access remains. Parties may obtain a transcript of the hearing recording only by paying transcriber's charges and in some circumstances the court issues a short note of reasons (e.g. a decision without a hearing).
DELIVERED?	IN PROGRESS	YES	NO	IN PROGRESS	NO

APPG FOR IP 2021 RECOMMENDATION	INCREASE SCT COST RECOVERY	MAINTAIN ATTACHÉ NETWORK	APPOINT AN IP ATTACHÉ IN BRUSSELS	APPOINT A MIDDLE EAST IP ATTACHÉ	IMPROVE EUROPOL/ INTERPOL COOPERATION
WHY THE APPG CONSIDERED IT IMPORTANT	The APPG noted that the £260 cap discourages claims and reduces deterrence.	The APPG emphasised that IP attachés are vital for UK business support and post-Brexit enforcement links.	The APPG believed that a dedicated presence in the EU was needed post-Brexit to develop greater engagement and enforcement cooperation.	The APPG noted that the Middle East region poses rising counterfeiting and enforcement challenges and a dedicated resource within the region was required.	The APPG warned of reduced post-Brexit access to shared data and that ongoing cooperation was essential to tackle cross-border IP crime.
GOVERNMENT ACTION TO DATE	No change to cap.	The current IPO five year Counter-Infringement Strategy committed the IPO to strengthening international IP cooperation and continuing global enforcement partnerships.	A Europe attaché has been appointed and is based in Brussels.	An IPO Middle East and North Africa (MENA) attaché has been appointed and is based in Dubai.	The UK continues to cooperate with Europol under the UK-EU Trade and Cooperation Agreement and has strengthened use of Interpol mechanisms (e.g. 'I-LEAP') to support international policing.
DELIVERED?	NO	YES	YES	YES	IN PROGRESS



Intellectual Property

About the APPG for Intellectual Property

The Group was launched in 2003 to create a resource for parliamentarians of both Houses interested in learning more about intellectual property (IP), its role in stimulating creativity and economic growth, how new services are developing to serve consumer needs, and the harm that can be caused when IP is not properly respected and protected. Luther Pendragon provides administrative support to the Group on behalf of the Alliance for Intellectual Property.

The Group is well supported by the Alliance for Intellectual Property, which is made up of a wide variety of organisations and industry groups across the creative sector, such as design, photography, sports, film and art. Their membership includes the likes of the Premier League, Motion Picture Association, the British Phonographic Industry (who run the BRIT Awards), the English Football League, British Toy and Hobby Association and the British Brands Group, among a number of others.

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