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Overview

Crimes against wildlife are widespread, numerous and varied. In general, wildlife crime can be defined as any action which contravenes current legislation governing the protection of the UK’s wild animals and plants and other species in trade in the UK. Certain types of wildlife crime can also have serious impact on the conservation status of species.

The UK Government is subject to a number of international obligations which ask for conservation-based offending to be subject of an effective enforcement regime. The police are charged with delivering on many aspects of these obligations. The police also have statutory obligations to protect and enhance biodiversity. These are best addressed by demonstrating an effective response to wildlife crime. However the UK’s response to wildlife crime has to be conducted with finite resources and accordingly, must focus its efforts to gain maximum impact. Consequently, wildlife crime is tackled in the UK via a recognised and robust priority setting strategy.

In the UK, the setting of wildlife crime priorities is done by the UK Tasking & Coordination Group (UKTCG) chaired by the NPCC lead for wildlife crime – currently North Yorkshire Police. The UKTCG ratifies the areas which should become national wildlife crime priorities. Their decisions are based upon recommendations contained within this Strategic Assessment, which is prepared by the NWCU. Aims and objectives for the Strategic Assessment are outlined in Appendix A. The UKTCG hold a strategic meeting every second year and priorities are set for the forthcoming two year period. The NWCU’s recommendations regarding the priority areas are formulated via a two-pronged approach:

1) The Wildlife Crime Conservation Advisory Group (WCCAG) advise NWCU in relation to the conservation importance of species and habitats and the importance of enforcement intervention. The WCCAG use a scoring matrix to assess the significance of crime against the species/habitats concerned; the conservation importance of the species/habitat and the need for enforcement action to deter offenders and thereby reduce future damage to wildlife. Recommendations/actions agreed by the WCCAG are sent by JNCC (WCCAG Secretariat) to the NWCU for inclusion in the Strategic Assessment.

2) The NWCU assess all other wildlife crimes. This is done via a MoRiLE risk assessment approach.

The resultant priority areas are the ones which have been assessed, by the UKTCG, as posing the greatest current threat to either the conservation status of a species or which score highly on the risk matrix and therefore they are those that are assessed as requiring an immediate UK-wide tactical response.

The tactical response to wildlife crime in the UK follows the agreed priorities and is supported through sound infrastructure. Each priority area has one (or more) Priority Delivery Groups (PDG’s) which implement key objectives and action plans. Each PDG has a plan owner and strategic leads who focus on the prevention and enforcement of crime. NWCU act as intelligence lead for every PDG.

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1 National Police Chiefs Council
2 Management of Risk in Law Enforcement
WCCAG Review of UK Wildlife Crime Conservation Priorities


The WCCAG met on 20th February 2018 to review the existing wildlife crime conservation priorities and identify any new or emerging priorities using established criteria and scoring matrices. Although a number of changes to the scores were agreed by the WCCAG, the following taxa remain as the highest scoring (non-CITES) conservation priorities for enforcement action:

- Bats.
- Freshwater Pearl Mussel (FWPM).

It is recommended that these areas remain as the UK’s wildlife crime (non-CITES) conservation priorities for 2018 - 2020.

A separate exercise was undertaken to review the CITES priorities. These areas were subsequently discussed at the CITES Priority Delivery Group meeting and the following were recommended to be put forward as the UK’s wildlife crime CITES priorities for 2018 - 2020:

- European Eel.
- Illegal trade in Raptors – particularly Goshawk and Peregrine Falcon.
- Illegal trade in Reptiles.
- Ivory.
- Rhino Horn.
- Stony Coral.
- Timber (logs, sawn, veneers) – particularly Rosewood.
- Traditional Medicines, Herbal & Health Supplements.

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3 Convention for International Trade in Endangered Species
4 March 14th 2018
5 The priority areas of rhino horn and the illegal trade in reptiles are subject to review as part of ongoing intelligence processes
MoRILE Review of UK Wildlife Crime Non-Conservation Priorities

The prioritisation of the threats faced for the non-conservation wildlife crime areas has been underpinned by the application of a risk tool known as MoRILE (Management of Risk in Law Enforcement). This model is now used by many law enforcement agencies/related organisations and is an essential technique which has allowed a consistent approach to be taken for the identification of all policing priorities, whether of a local, regional or national level. As more agencies use the MoRILE model, the greater the ability will be to produce an informed national picture of risk.

MoRILE is designed to work with the National Intelligence Model to support the effective assessment and management of risk and allow proportionate decision-making at every level.

The key features of the MoRILE process are:

1. Prioritisation of resources through a transparent and informed decision making process.
2. Assessment of a range of thematic areas alongside each other.
3. Assessment of capability and capacity in relation to each thematic area.
5. Use of a common language in relation to risk.
6. A clear process that is easy to use and understand.

For wildlife crime, the use of MoRILE allows the UKTCG to weigh up competing demands against limited resources. It has allowed for a comparison to be made for other types of wildlife criminality (which were not included in the WCCAG scoring) despite the fact that the crime types differ in scale, frequency, harm and criminal motivation.

The NWCU carried out a MoRILE scoring exercise in conjunction with the Priority Delivery Groups (PDG’s) for non-conservation crime (Badger Persecution and Poaching). Analysis of intelligence, academic papers and expert advice from the Priority Delivery Groups were utilised to provide clear justifications behind the MoRILE scoring.

NWCU also consulted with subject experts to score several other key non-priority areas - Finch Trapping\(^6\), Illegal Shell Fishing\(^7\) and Egg Theft\(^8\). These are areas upon which NWCU continue to receive intelligence but are not considered under the WCCAG scoring.

The results of the MoRILE scoring matrix confirmed that the current non-conservation priority areas remain the areas of most risk. Therefore it is recommended that these areas remain as the UK’s wildlife crime non-conservation priorities for 2018 - 2020.

- Badger Persecution.
- Poaching – Hare Coursing, Deer Poaching and Fish Poaching.

\(^6\) With advice from RSPCA
\(^7\) With advice from MMO
\(^8\) With advice from RSPB
Thematic Threat Areas

The aim within this Strategic Assessment was to contextualise wildlife crime by considering activity within key thematic threat areas which cut across many aspects of wildlife crime. The structure of this report reflects this, and seeks to focus on the ways in which wildlife crime is perpetrated, rather than limiting it on a species by species basis. This evolution is key, not just to progress operational activity, but more importantly to enable proactive work with partners to prevent further offending. The intention is to outline a clear understanding of the threats, risks and harm posed by wildlife crime affecting the UK. The adoption of this fresh approach has identified the thematic threats which are ultimately allowing criminality to continue or are hindering the effective investigation or prosecution of offences. The thematic threat areas are shown below:

Cyber Crime
The use of the internet, as an enabler in the facilitation of wildlife crime, is manifest throughout many types of wildlife crime - from the online trade in illegal egg collections to the organisation of hare coursing competitions to the trade in CITES species. The true extent of trade in CITES species on the internet is not fully known but is clearly a substantial risk. Online auction houses have a worldwide global reach and current CITES investigations in the UK are rarely without an element of online trading.

Organised Crime Groups
Cross border criminality is an issue that cuts across several types of wildlife crime (most notably hare coursing and badger baiting). Where the NWCU possess evidence of wildlife criminals being part of cross-border Organised Crime Groups (OCG’s) the intelligence is analysed for onward transfer to the national map.

Violence and Community Tension
Hare coursing in particular is associated with violence, threats, intimidation and damage - all of which causes significant fear and distress to sections of the community. Fear of intimidation and violence can prevent landowners/farmers reporting hare coursing to the police. Farmers may resort to ridding their land of hares purely to prevent associated risk when hare coursing occurs.

Wildlife crime guidance
In addition to the above, it is also recognised that a lack of standardised guidance for wildlife crime investigation is an over-arching barrier to successful enforcement. The NWCU and the College of Policing have already published standardised guidance for Bat and Badger Persecution but there are several key areas which have yet to be completed. The guidance also needs to be continually reviewed to ensure it delivers what it was initially intended for. It is also recommended that the guidance is clearly linked to the NPCC wildlife crime policing strategy and is thereafter cascaded down through training and the national conference.
Enforcement of Wildlife Crime and Future NWCU strategy

The outcomes of the NPCC’s wildlife crime policing strategy for 2018 – 2021 will reflect the key enforcement work needed to protect wildlife. In particular, the strategy has outlined several improvements for police forces:

- Establish senior officer leads for all police forces in tackling wildlife crime and raising internal police awareness.
- Seek accreditation for national training for PWCO’s from the College of Policing.

With the launch of the NPCC’s wildlife crime strategy, PWCO’s across the UK will be better equipped to tackle wildlife crime - with senior officer leads in every force, accredited training and future funding. The NPCC strategy for wildlife crime should also consider tackling the thematic threat area of violence and community tension. If all UK police forces are given clear objectives to tackle this threat they can collectively take action to enforce and prosecute wildlife crime associated violence.
Proposed NWCU Response to Wildlife Crime Priorities

There needs to be a clear differentiation between NWCU’s response to the wildlife crime priorities and that of the police. NWCU have historically sought all intelligence for every priority area. However, the collation of all intelligence regarding the non-conservation crime priorities (Badger Persecution and Poaching) has resulted in overwhelming volumes that the NWCU no longer has the capacity to fully process. In addition, a vast proportion of non-conservation wildlife crime is committed at the local or regional level where it is adequately and professionally investigated by local PWCO’s and is not generally of national significance.

NWCU have recently taken steps to review the intelligence submissions of the non-conservation priority areas and focus on “quality over quantity”. It is recommended that NWCU no longer collate all intelligence on Badger Persecution and Poaching but rather focus on actionable or developmental intelligence.

Both Badger Persecution and Poaching would remain as national priorities and their Priority Delivery Groups would continue to meet objectives around Prevention, Intelligence and Enforcement. NWCU will still continue to support both these PDG’s - as currently done via continued attendance at the PDG’s, analysis as appropriate and continued support for training.

Intelligence regarding Badger Persecution and Poaching will continue to be developed locally by police forces across the UK and NWCU will continue to identify and map OCG’s for these areas.

It is recommended that NWCU develop a national strategy that will allow the continued support to all priority areas without the overwhelming collation of non-conservation intelligence, while also tackling several of the thematic risk areas, as outlined above. NWCU strategy would therefore be set as:

To support Police Forces and partners in criminal investigations where required.
NWCU Investigative Support Officers will continue to support investigations where required, regardless of priority status. NWCU ISO’s regularly support investigations into non priority areas (such as SSSI damage, the illegal trade in parrots or the release of non-native species). If additional ISO support is imperative in any investigation, it will be provided whenever possible.

To identify Organised Crime Groups (OCG’s) involved in wildlife crime through the information sharing process.
Analytical staff should identify OCG’s across England & Wales for all relevant priority areas, both conservation and non-conservation.

To enhance cross-border work amongst police forces and partners.
This strand would follow directly from the identification of OCG’s but would also apply even for non-priority areas, provided cross border work is clearly vital - such as with Operation EASTER, which NWCU supports on a yearly basis.

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9 Subject to capacity
To develop methods of working together between all agencies/businesses in reducing wildlife crime and enhancing conservation.
NWCU will continue to support all Priority Delivery Groups as normal. NWCU will also continue to support all groups which operate under PAW (Marine, Training and Forensics Working Groups) and any other groups who tackle substantial issues of need such as the Non Native Species board.

Focus on tackling the key areas of Cyber-Crime and wildlife crime guidance.
It is recommended that these thematic threat areas/barriers to effective enforcement, as outlined above, serve as key drivers in the ongoing strategy of NWCU. Rather than NWCU collecting all intelligence for the non-conservation crime areas, a focus on the thematic threat areas will allow NWCU to add value to the enforcement of all types of wildlife crime via a clear strategic methodology.

As a neat corollary - if adopted, this strategy for NWCU will also reflect several of the key areas for enforcement which are outlined in the forthcoming NPCC wildlife crime policing strategy:

- Focus on online and dark-web wildlife crime (via focus on cyber-crime thematic threat area).
- Strengthen approach to tackling OCG’s (via focus on OCG thematic threat area).
- Develop the briefing notes available on the College of Policing’s Authorised Professional Practice (APP) to assist investigators and call handlers (to ensure lack of standard guidance is no longer a barrier to successful enforcement).

It is recommended that the NWCU response to wildlife crime should be tailored depending upon whether the issue is one of conservation\textsuperscript{10} or non-conservation\textsuperscript{11}:

National conservation priorities
- Priority Delivery Groups continue with NWCU involvement.
- NWCU intelligence requirement\textsuperscript{12}.
- NWCU investigative support given as a priority\textsuperscript{13}.
- PDG will receive NWCU analysis if requested.
- NWCU will continue to identify OCG’s.

National non-conservation priorities
- Priority Delivery Groups continue with NWCU involvement.
- Focused intelligence collection (quality over quantity).
- PDG will receive NWCU analysis if requested\textsuperscript{14}.
- NWCU will continue to identify OCG’s.

Altering the NWCU’s ongoing strategy will not impact on the day to day work of wildlife crime officers across the UK but is intended to enhance the NWCU’s ability to support that work. Whether the issue is a conservation one or not; whether it is a priority or not, UK police forces will continue to enforce with an appropriate and measured response. In addition, the policing response will be further enhanced by both the introduction of the NPCC policing strategy and the ongoing development of the APP guidance.

\textsuperscript{10} Bat Persecution, CITES, FWPM, Raptor Persecution
\textsuperscript{11} Badger Persecution, Poaching (Deer and Fish Poaching and Hare Coursing)
\textsuperscript{12} Except where previously agreed protocol in place to receive incidents rather than intelligence - such as with BCT
\textsuperscript{13} Subject to capacity
\textsuperscript{14} Hotspot/seasonality analysis can only be provided when incident data is supplied, such as that collated by the Badger PDG
Appendix A – Aim and Purpose of Strategic Assessment

Aim and purpose
The Strategic Assessment is a National Intelligence Model product aimed at providing a strategic overview of the threats faced by the UK since the last Strategic Assessment was produced\textsuperscript{15}. The purpose of this Strategic Assessment is to:

- Enable the prioritisation of the most harmful issues within the UK’s response to wildlife crime.
- Review the current priority areas to understand whether the threat is still present and ultimately to recommend if each needs to continue to be a priority area of business.
- Take into consideration the priorities which are highlighted by the Wildlife Crime Conservation Advisory Group (WCCAG) which are based on conservation status/concerns.
- Describe and explore the strategic threats and harm caused by wildlife crime.

Methodology
The following data sources were used to underpin both the MoRiLE scoring and the assessment:

- Data held by NWCU in the Wildlife Intelligence Database (WID). WID contains intelligence from a range of sources, including regulatory and law enforcement bodies and Non-Government Organisations. This is augmented by intelligence generated by NWCU staff.
- Data held on the Scottish Intelligence Database (SID).
- Other information or data received from UK Law Enforcement Agencies (LEA’s).
- Other information received from partner agencies.

Limitations:
This assessment focuses on priority setting and an analysis of cross cutting strategic issues. It does not form an exhaustive review of the response to wildlife crime by regulators, law enforcement bodies or partner agencies. As such this assessment has not included plan owner updates from the priority delivery groups – these will be considered, as normal, in the next Tactical Assessment (due November 2018).

\textsuperscript{15} May 2016
Appendix B – WCCAG

The Wildlife Crime Conservation Advisory Group (WCCAG) is comprised of:

UK Statutory Nature Conservation Organisations:
- Joint Nature Conservation Committee
- Natural England
- Scottish Natural Heritage
- Department of Agriculture, Environment and Rural Affairs (DAERA NI)
- Natural Resources Wales

Other Statutory Agencies:
- Animal and Plant Health Agency
- Association for Inshore Fisheries and Conservation Authorities
- Environment Agency
- Royal Botanic Gardens (Kew)

Enforcement Authorities
- National Wildlife Crime Unit
- Marine Management Organisation
- Metropolitan Police Wildlife Crime unit
- UK Border Force (CITES Team)

Defra

Relevant Non-Government Organisations:
- Bat Conservation Trust
- RSPB
- TRAFFIC
- WWF (on behalf of the Species Survival Network)

The WCCAG met on 20th February 2018 to review the existing wildlife crime conservation priorities and identify any new or emerging priorities ahead of the next Strategic Review by the UKTCG, using established criteria and scoring matrices.