

Strategic Assessment – UK Wildlife Crime 2020 - 2022

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Executive Summary

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 NPCC¹ lead for wildlife crime – currently with Cheshire 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 NWCUC. 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 NWCUC's recommendations regarding the priority areas are formulated via a two-pronged approach:

1) The Wildlife Crime Conservation Advisory Group (WCCAG) advise the NWCUC 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 JNCC² (WCCAG Secretariat) to the NWCUC for inclusion in the Strategic Assessment.

2) The NWCUC assess all other wildlife crime. This is done via a MoRiLE³ 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 - 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 more⁴) 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. The NWCUC act as intelligence lead for every PDG.

¹ National Police Chiefs' Council

² Joint Nature Conservation Committee

³ Management of Risk in Law Enforcement

⁴ Poaching and Raptor Persecution each have a PDG for England & Wales and a PDG for Scotland

Summary of recommendations

1. The UK's wildlife crime **conservation** priorities for 2020 – 2022 should be accepted as:
 - Bat Crime
 - CITES⁵
 - Freshwater Pearl Mussel (FWPM)
 - Raptors – Golden Eagle, Goshawk, Hen Harrier, Peregrine Falcon and White Tailed Eagle
2. The following areas should be accepted as the CITES priorities for 2020 - 2022:
 - European eel (*Anguilla anguilla*)
 - Illegal Trade in Raptors
 - Ivory (all ivory bearing species)
 - Medicinal & Health Products
 - Reptiles
 - Timber (with a new focus on Rosewoods and Aquilaria)
3. Rhino horn should no longer be a CITES priority area.
4. The UK's wildlife crime **non-conservation** priorities for 2020 – 2022 should be accepted as:
 - Badger Persecution
 - Poaching – Hare Coursing, Deer Poaching and Fish Poaching
5. Cyber Enabled Wildlife Crime should be retained as a UK wildlife crime priority for 2020-2022.
6. NPCC to consider the Defra consultation on the extended list of notifiable wildlife crime offences and discuss implementation with the Home Office.
7. The NWCUC to work with each Priority Delivery Group to ensure the wildlife crime guidance notes are completed for each priority area.
8. The wildlife crime guidance to be clearly linked to the NPCC wildlife crime policing strategy and to be thereafter cascaded down through training and the national conference. Guidance to be made available for all force call handlers to ensure an accurate response is provided across the full range of wildlife incident types.
9. UKTCG to decide if Organised Illegal Hunting with Pack Dogs should be progressed via a Working Group (under the NPCC Hunting Portfolio) or a new Priority Delivery Group (under the Wildlife Crime portfolio). The group needs to determine knowledge gaps, utilise supporting evidence and include the outcome of the protest policing review. The appointed chair must be fully independent and seek to fully clarify the scope of the thematic threat area.
10. The NWCUC to work with PND⁶ developers to identify suitable wildlife crime markers and subsequently push the use of markers to all Police Wildlife Crime Officers and force intelligence teams.
11. NWCUC to collate and disseminate good practice policies from Police Forces with expanded Rural Crime teams to assist other forces build

⁵ Convention for International Trade in Endangered Species

⁶ Police National Database

evidence based assessments on the costs and benefits of these teams. Forces can submit the evidenced based assessments to their Police Crime Commissioners (PCC's) to draw attention to the associated benefits that expanded Rural Crime teams will bring to the community. This will also assist forces to deliver the objectives within the [NPCC Wildlife Crime Strategy 2018-2021](#) which all PCC's have signed up to.

12. In order for the UK to adequately tackle the Illegal Wildlife Trade (IWT) there must be a consistent coordinated approach between the NWCU, Border Force and the NCA⁷. A clear investigative pathway needs to be identified to ensure the NWCU and Border Force investigators have formal access to the organisational capabilities of the NCA. This would ensure serious and organised IWT can be effectively identified and investigative linkage between IWT and 'traditional' OCG's⁸ can be analysed.
13. A working group to be set up to consider the issues around improving enforcement of the restrictions on the use of lead shot which is having a negative impact on the favourable conservation status of waterbirds across the UK. Relevant personnel to be identified to chair and participate in such a group.



⁷ National Crime Agency

⁸ Organised Crime Groups

WCCAG Review of UK Wildlife Crime Conservation Priorities

The Wildlife Crime Conservation Advisory Group (WCCAG) is informed by many agencies including Defra, UK Statutory Nature Conservation Organisations, Other Statutory Agencies, Enforcement Authorities and Relevant Non-Government Organisations. See Appendix B for details.

The WCCAG met on 4th February 2020 to review the existing wildlife crime *conservation* priorities and identify any new or emerging priorities using established criteria and scoring matrices (see Appendix B). 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:

- Bat Crime
- Freshwater Pearl Mussels (FWPM)
- Raptor Persecution

It is recommended that these areas remain as the UK's wildlife crime (non-CITES) *conservation* priorities for 2020 - 2022.

It was agreed that Raptor Persecution should continue to be addressed with a focus on 'hotspots' of illegal activity, rather than specific species. Although, five species (that scored highly against the criteria in the matrix) are regarded to need particular attention, to help drive action and encourage community engagement in key areas. The five key species are Golden Eagle, Goshawk, Hen Harrier, Peregrine Falcon and White-tailed Eagle⁹.

⁹ The score for red kite was reduced and recommended to no longer be a priority species, given the significant population recovery

A separate exercise was undertaken to review the CITES priorities¹⁰, to determine whether they remain priorities for concerted action, and to identify any new threats or emerging issues that need further consideration. The following were recommended to be put forward as the UK's wildlife crime CITES priorities for 2020 - 2022:

- European eel (*Anguilla anguilla*)
- Illegal Trade in Raptors
- Ivory (all ivory bearing species)
- Medicinal & Health Products
- Reptiles
- Timber (with a new focus on Rosewoods and Aquilaria)



¹⁰ 29th November 2019

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 at 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.
4. Avoidance of bias in risk assessment.
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.

MoRiLE scores are calculated across three key areas:

- Impact and Harm (victim, community and environment)
- Likelihood (frequency, volume, trend and forecast)
- Organisational Position (public interest, reputation and politics, economic cost, capacity and capability)

An assessment is also made regarding knowledge confidence levels in the scoring for each thematic area.

The NWCU carried out a MoRiLE scoring exercise in conjunction with the Priority Delivery Groups (PDG's) for the current *non-conservation* wildlife 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 scoring. The NWCU also consulted with subject experts to score several other key non-priority areas - Finch Trapping, Egg Theft, Non Native Species and Organised Illegal Hunting with Pack Dogs. These are areas which continue to be seen in 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 2020 - 2022.**

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

Notification of Wildlife Crime and Wildlife Crime Guidance

Notification of wildlife crime

Most wildlife crime is not notifiable in England & Wales, despite there being nationally agreed wildlife crime priorities. Notifiable offences are those which Police Forces, or those responsible for enforcement of offences, are obliged to report back to the Home Office, so that the offences are documented and contained within national crime statistics. There is therefore a national standard for the recording and counting of these offences. In 2017, the Wildlife & Countryside Link published a review of the effectiveness of wildlife crime notification. There was a recognition that the accurate measuring of confirmed crimes will assist in the identification of national, regional and local priorities. Geographical 'hot-spots', trends and patterns would be revealed by location and over time¹. Police forces need to identify crime levels so they can make appropriate resource allocation to effectively investigate. It is currently impossible to obtain accurate data on wildlife crime levels in England and Wales. Any research into crime recording relies upon statistics from non-governmental organisations (NGOs), which leads to inconsistencies and accusations of impartiality. Several Police Forces have implemented improved crime and incident recording/retrieval on their own data management systems but this appears to be limited only to those few forces who have dedicated Rural and Wildlife Crime teams.

In early 2019, Defra supported the NPCC in drawing up a list of additional wildlife offences to be classed as notifiable. This review was to be presented to the National Crime Registrar so that the Home Office could decide which offences to make notifiable. PAW¹¹ partners, NWCU staff and all members of the Priority Delivery Groups were consulted. However, the results of this consultation have not yet been published.

¹¹ Partnership for Action against Wildlife Crime

It is recommended that the NPCC consider the Defra consultation on the extended list of notifiable wildlife crime offences and discuss implementation with the Home Office.

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 Crime and Badger Persecution but there are several key areas which have yet to be completed. **It is recommended that the NWCU work with each Priority Delivery Group to ensure guidance notes are completed for every priority area. It is also imperative that the guidance is continually reviewed to ensure it meets current legislative and procedural guidelines.** Trained Police Wildlife Crime Officers (PWCOS) provide knowledge and experience in this specialised area and are key advisors for other officers within their force. National wildlife crime guidance must be made available to ensure all officers can investigate offences in a cohesive manner. **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. Furthermore, guidance should be made available for all force call handlers to ensure an accurate response is provided across the full range of wildlife incident types.**

Current Wildlife Crime Priority areas

Badger Persecution



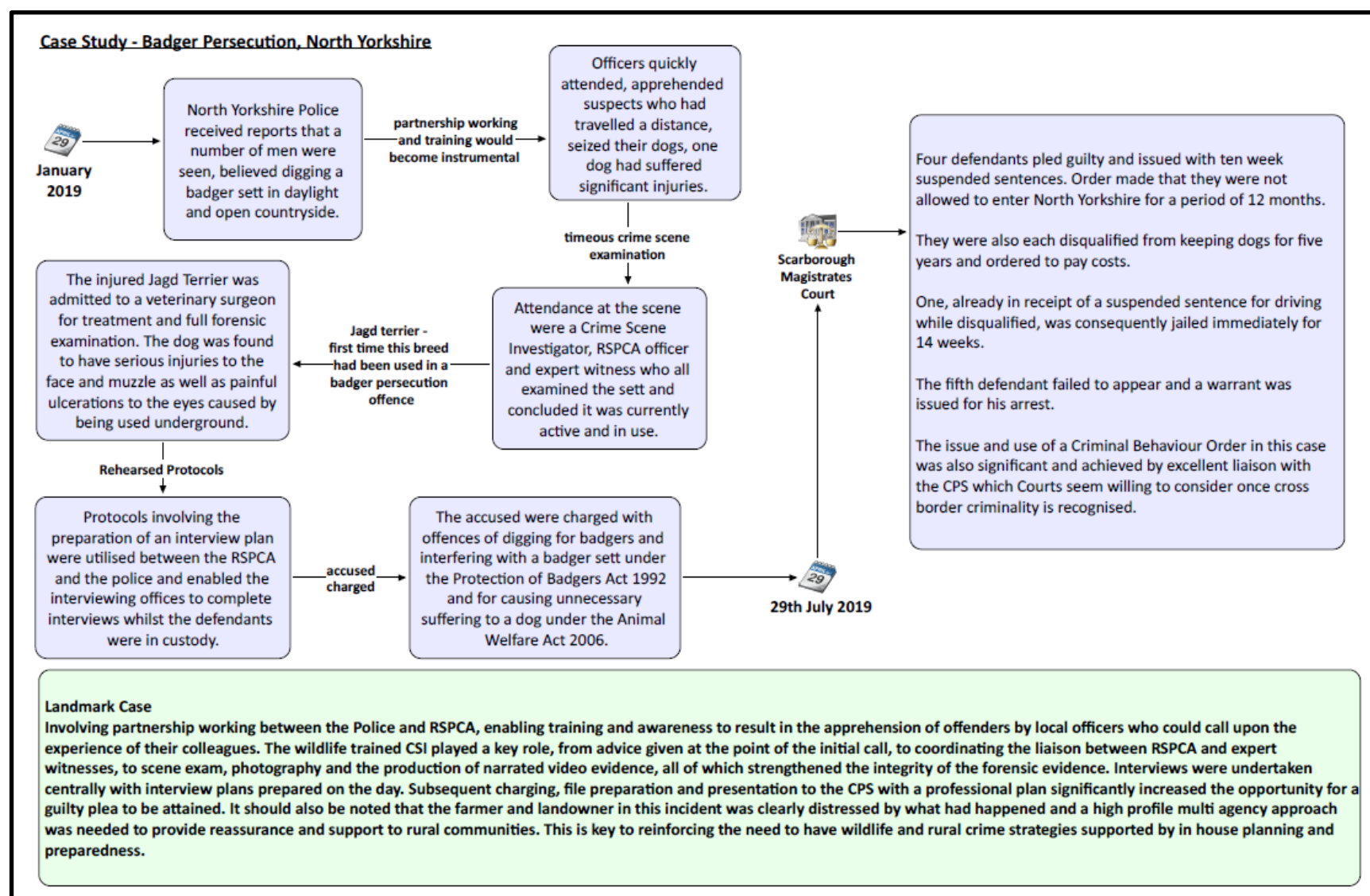
The European Badger is resident across the United Kingdom and is protected under UK legislation. It is an offence to take, injure or kill a badger or attempt to do so, to inflict cruelty on a badger or to possess or sell a badger¹². It is also an offence to interfere with a badger sett whilst it is in current use. Interference includes damaging a sett or any part of it, destroying a sett, obstructing access to any sett or entrance, causing a dog to enter a sett, or disturbing a badger whilst it is occupying its sett.

Protection is provided primarily by the Protection of Badgers Act 1992, and additional protection is sometimes provided by the Wildlife and Countryside Act 1981, the Animal Welfare Act 2006 and the Hunting Act 2004. Badgers are also listed on Appendix III of the Convention on the Conservation of European Wildlife and Natural Habitatsⁱⁱ.

MoRiLE review

The NWCU undertook a MoRiLE scoring assessment for Badger Persecution in consultation with key members of the Badger Persecution PDG and other partners. The Impact & Harm, Likelihood and Organisational Position scoring remain significantly high. The Badger Persecution PDG in England & Wales continues to make excellent progress in achieving its key objectives to increase reporting, improve investigations and increase public awareness. **It is therefore recommended that Badger Persecution is retained as a UK wildlife crime priority for 2020-2022.**

¹² Badger culling is permitted **under licence** within defined areas of England

Case Study – Badger Persecution, North Yorkshireⁱⁱⁱ

Bat Persecution

England and Wales host 18 species of bats. All are protected against killing, injuring, harm and disturbance. Their breeding and resting places (roosts) are protected against damage and destruction even when the animals are not present. Protection is provided primarily by the Conservation of Habitats & Species Regulations 2017, and additional protection is provided by the Wildlife and Countryside Act 1981 (as amended) and, in some circumstances, by the Animal Welfare Act 2006^{iv}.

WCCAG review

The WCCAG undertook a conservation scoring assessment for Bat Persecution. Prevention work by the PDG is considered to have been highly successful although difficult to quantify. Most species of bats have stable or increasing populations, and criminal activity was not having a significant impact on species recovery.

The WCCAG decided that the terminology should be altered from bat 'persecution' to bat 'crime' as it is generally accepted that offences tend to be planning contraventions rather than deliberate persecution. Restorative justice is considered to be key to mitigating crimes against bats. The people who get prosecuted are those who knowingly and wilfully commit the crimes.

It is recommended that Bat Crime is retained as a UK wildlife crime priority for 2020-2022.

Focus on Bat Crime and POCA

In a landmark case in 2016, a company was hit with a POCA (Proceeds of Crime Order) confiscation for destroying a bat roost. The POCA legislation is one which is normally used for convicted drug dealers and serious organised fraudsters. It was the first time a POCA confiscation had been made in a case against domestic wildlife. Since then, three additional POCA applications have been successfully taken out against individuals who have committed crimes against protected bats, resulting in a total confiscation of more than £17,000¹³.

The [landmark case](#) occurred in 2016 when Isar Enterprises Ltd were fined £3000, £2000 costs and were subjected to a POCA order of £5737 for destroying a roost of Brown Long-Eared bats in the loft space of one of the properties they were developing, despite commissioning a survey which had identified the presence of bats.

The second successful POCA confiscation was made in 2018 when [two men were sentenced](#) for destroying bat roosts in Dorset. Developers Christopher Wilson and David Stokes were fined a total of £3,350, costs of £1,190 and were ordered to pay £2,500 under the Proceeds of Crime Act. Wilson and Stokes had demolished buildings - that were known to contain roosts for Pipistrelle and Long-Eared Bats – without applying for the correct licenses.

A complex investigation undertaken by Kent Police in April 2018 saw London based Knightspur Homes [convicted on three counts](#) of roost destruction. On each charge the company was fined £4000, with costs of £3036 and a POCA confiscation of £5285. In total, the company were ordered to pay £20,321 to the court within 7 days. Knightspur Homes had failed to secure a licence before demolishing a building that had been known to contain roosting bats.

Most recently, in October 2019, Iain Russell Turner [admitted destroying a bat roost](#) in Dorset and was ordered by the court to pay more than £7,000. Turner had demolished a log store at his property which contained a roost of Natterer's bats. Natterer's bats are scarce in the UK so our population is of international importance. Turner was sentenced by the judge to a fine of £3,000, costs of £425 and a £3,720 POCA confiscation order.

These cases clearly demonstrate why Bat Crime is one of the key UK wildlife crime priorities and the value of using POCA for wildlife offences has been set a clear precedent which will ideally be replicated across all the other types of wildlife crime.

¹³ Although outwith the strategic period, previous cases have been included to augment focus on the development of POCA in protected species convictions.

CITES

International trade in wildlife is regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); an international agreement between governments that aims to ensure that international trade in wild animals and plants does not threaten their survival. CITES lists more than 35,000 species in Appendices, according to the degree of protection they need. Individual governments are responsible for implementation of the Convention. In the UK, Defra is the CITES Management Authority. The Convention is implemented through COTES (Control of Trade in Endangered Species) (Enforcement) Regulations 2018 (or 1997). Defra is advised on plant matters by the Royal Botanic Gardens Kew and on animal matters by the Joint Nature Conservation Committee (JNCC), which together constitute the CITES Scientific Authorities. APHA¹⁴, an executive agency of Defra, provides policy advice to the government on CITES and wildlife enforcement issues. It also issues import, export and sale licences for species listed on the appendices of CITES and the annexes to the EU Wildlife Trade Regulations. The police have primary responsibility for enforcing the provisions of COTES. UK Border Force has primary responsibility for enforcing the Customs and Excise Management Act 1979 (CEMA) and the offences relating to imports and exports of wildlife contrary to the provisions of CEMA and the COTES Regulations. Other domestic legislation such as the Wildlife and Countryside Act 1981 play their part when offences relate to impact on UK species. These can all provide a predicate offence from which Proceeds of Crime Act or Criminal Finances Act offences can be launched.

The UK is implicated as both a transit and destination country for trade in illegal wildlife products, as well as being a source country in some cases (e.g. live raptors for the falconry trade)^v.

WCCAG review

The WCCAG CITES sub-group undertook a conservation scoring assessment for the CITES wildlife crime conservation priorities, determine whether they remain priorities for concerted action, and to identify any new threats or emerging issues that need further consideration.

It is recommended that the following are retained as the UK wildlife crime CITES priorities for 2020-2022:

- **European eel (*Anguilla anguilla*)**
- **Illegal Trade in Raptors**
- **Ivory (all ivory bearing species)**
- **Medicinal & Health Products**
- **Reptiles**
- **Timber (with a new focus on Rosewoods and Aquilaria)**

The WCCAG agreed that Rhino horn no longer meets the criteria for being treated as a current priority and recommended removal. Whilst the WCCAG recognises that poaching remains a serious threat to rhino populations in Africa and conserving rhino remains a global priority, there is no evidence or intelligence to suggest there is any serious criminality involving the UK at the current time. There are no criminal activities associated with this species that require an immediate and UK-wide tactical response.

¹⁴ Animal and Plant Health Agency

Focus on CITES illegal trade in eels

The UK has been involved as a supply and transit country and even a consumer in the illegal trade in European Eel (*Anguilla anguilla*). There is much recent evidence of huge profits made on illegally exported eels from Europe to the Far East including a recent example of using the UK as a transit country from Spain.

Due to a dramatic decline in numbers the European Eel is protected under the European Eel Regulations 2007. It is also listed under Appendix II of CITES. Trade is therefore controlled and exports outside of the EU are currently banned. Licensed fishing for Glass Eels (young eels) took place between 1st March and 1st May 2020 and was monitored by the Environment Agency who deal with any breaches of licences and unlicensed fishing.

Since the early 1980's there has been a large increase in the market demand for elvers within East Asia. European Eel is imported without the necessary permits, mislabeled (as non-CITES listed species) and provided to varying outlets, including high-end restaurants, for UK consumption.

The NWCU is, and has been, actively involved in the prevention, investigation and enforcement of the legislation relating to eels. In 2015, after an initial meeting with the relevant agencies in the UK, representatives from the NWCU and with Border Force attended the first meeting at Europol under the operational name of Operation Lake. Since the first meeting, the NWCU and Border Force have been regular attendees and contributors at Operation Lake meetings with both Europol and Interpol.



In 2019 the NWCU was responsible for hosting a meeting of all European Enforcement partners at the National History Museum. One of the prime functions of the unit as a partner in Operation Lake has been the exchange of intelligence, which is the life blood of the prevention and investigation into the illegal trade. In 2017, as a result of intelligence received from the Spanish authorities a seizure of glass eels being illegally exported out of the UK via Heathrow was seized by Border Force, the shipper was subsequently arrested by the NCA. After a lengthy investigation by the NCA (aided by Border Force, the Environment Agency, CEFAS¹⁵ and the NWCU) the defendant, [Gilbert KHOO, was found guilty](#) at Southwark Crown court of a number of offences relating to the illegal export of live glass eels and received a two year prison sentence suspended for two years.

Since 2017 the NWCU has coordinated an annual pre-season briefing meeting involving all the relevant enforcement authorities within the UK. The unit has also been involved in raising the profile of the illegal glass eel trade both with enforcement agencies, with the issue of an alert to all police forces, and to the wider general public with an item appearing on the BBC's Countryfile.

¹⁵ Centre for Environment, Fisheries and Aquaculture Science

Case Study – Operation RAMBLER, Lancashire



In August 2020, a Lancashire taxidermy dealer who traded illegally in critically endangered species was [sentenced to a total of 56 weeks in custody](#). The sentence was the result of complex two-and-a-half-year investigation by Lancashire Police and the NWCUC.

Arron HALSTEAD had been offering to sell a black rhino skull, a sawfish rostrum and a sperm whale tooth without the required permits. HALSTEAD had been well aware that permits were required and was attempting to sell the items undetected.

HALSTEAD pleaded guilty to six offences contrary to the Control of Trade in Endangered Species (Enforcement) 1997. These related to the prohibited trade in Tiger skulls, Elephant tusks and Rhino horns – some of the world's most critically endangered species.

This was the third occasion that this offender had come to the attention of the Police and the NWCUC. In 2015 Halstead was given a 24-week prison sentence for the prohibited trade in endangered species. He is believed to be the first person in the UK to be imprisoned twice for offences under the COTES Regulations.

Cyber Enabled Wildlife Crime

Within the last Strategic Assessment, wildlife criminality was contextualised within key thematic cross cutting threat areas, focusing on the ways in which wildlife crime is perpetrated, rather than limiting it on a species by species basis. This evolution was key, and allowed for the identification of cyber enabled wildlife crime as a thematic threat area. Cyber enabled wildlife crime ultimately allows criminality to continue or hinders the effective investigation or prosecution of offences. The true extent of trade in CITES species on the internet is still not fully known but is clearly a substantial risk.

The use of the internet as an enabler in the facilitation of wildlife crime, is manifest throughout many types of wildlife crime. Very few of the NWCU's investigations into illegal trade in wildlife are without a 'cyber' element and the use of on-line tools evidently enables the trade in endangered species to continue unabated.

It is therefore recommended that Cyber Enabled Wildlife Crime is retained as a UK wildlife crime priority for 2020-2022.

Focus on Cyber Enabled Wildlife Crime

The vast majority of illegal wildlife trade investigations that the NWCUC have supported in recent years have included varying aspects of on-line trade. Our growing awareness of 'cyber' enablers highlighted how integral it was to have a Priority Delivery Group look exclusively at cyber enabled wildlife crime.

Arron HALSTEAD, Lancashire Police, August 2020

HALSTEAD was sentenced to 56 weeks in custody. He was engaged in an extensive trade in taxidermy, using his legal trade to front a lucrative illicit trade with dealers from around the globe. HALSTEAD used his business website in an attempt to sell a black rhino skull, a sawfish rostrum and a sperm whale tooth without the required permits. HALSTEAD had already [been jailed for illegal wildlife trade in 2015](#) so was well aware of the legal status of the species involved and the fact that permits were required to sell them.

Slawomir KAZMIERCZAK, Lincolnshire Police, October 2019

In October 2019 KAZMIERCZAK was sentenced to nine months in prison. He pleaded guilty to five charges related to illegal trade in ivory and four charges of fraudulently evading export restrictions. The investigation commenced after UK Border Force intercepted packages at Heathrow. The packages had been mislabelled as bone/wood but were found to contain ivory. They were destined for China and Hong Kong. When Lincolnshire Police and the NWCUC carried out a warrant at KAZMIERCZAK's home, they found wardrobes full of ivory.

Peter MAW, Gloucestershire Police, January 2020

Peter Maw from Cheltenham was sentenced in January 2020 after he pleaded guilty to five counts of fraudulently evading restrictions on the export of elephant tusks and walrus ivory out of the country. MAW was given a three-month suspended sentence and ordered to pay £500 in court costs. The investigation was instigated when customs officers at Heathrow Airport intercepted a package which was declared as a gift worth £15, when in fact it was a carved ivory figure which had been sold for £147 and was on its way to China. MAW did not have the necessary permits to export or re-export outside the UK so the package was seized and follow up enquiries were undertaken by Gloucestershire Constabulary and the NWCUC.



Timothy NORRIS, Metropolitan Police, September 2018

Timothy NORRIS pleaded guilty, in September 2018, to selling clothing which was fashioned from endangered big cats. NORRIS illegally listed fur coats, hats and scarves for sale on eBay. The items were leopard, ocelot, lynx and wolf skin. NORRIS was given 200 hours of community service and the garments were seized by the Metropolitan police.

Michael TANG, South Wales Police, October 2019

In October 2019, Michael TANG from Cardiff pleaded guilty to 18 charges contrary to the COTES (Enforcement) Regulations 1997 and six charges contrary to the Customs and Excise Act 1979. TANG was given a 12 week suspended sentence. He was also given 120 hours unpaid work and ordered to pay £1200 costs. All the items subject to the charges were forfeited, the majority being primate skulls but also including a La Plata River Dolphin skull. TANG admitted to purchasing a number of items on eBay and also to importing items from outside of the EU. He was unable to provide evidence of their legal purchase or importation and the items were seized. Expert examination of the Gorilla, Chimpanzee and Orangutan skulls highlighted that all still had gun shots within them - indicating they had been shot and taken directly from the wild. Although there was no evidence that TANG was directly concerned with the original taking of these species from the wild, his involvement in the trade as a buyer helped fuel the demand for such items and the subsequent illegal taking and trade from the countries of origin of these species.



Fresh Water Pearl Mussel (FWPM)

Freshwater pearl mussels are similar in shape to common marine mussels but grow much larger and can live for more than 100 years, making them one of the longest-lived invertebrates. A mussel may very occasionally bear a pearl. These mussels live on the beds of clean, fast-flowing rivers, where they can be buried partly or wholly in coarse sand or fine gravel. They feed by drawing in river water and ingesting fine particles of organic matter. An adult freshwater pearl mussel can filter more water in a day than an average person uses to shower. Mussels have a complex life cycle: in their first year, they live on the gills of young Atlantic salmon or brown trout, without causing harm to the fish.

Freshwater pearl mussels are rare and are under threat from illegal pearl fishing, poor water quality and habitat damage. The mussel's over-exploitation for centuries is the primary reason for the massive historic decline in its numbers and range. As filter feeders, freshwater pearl mussels are also extremely vulnerable to water pollution and engineering work in rivers. The effect of these threats means that the species is on the brink of extinction in several rivers, particularly in Scotland. It is illegal to disturb, injure, take or kill a freshwater pearl mussel. Despite this protection, illegal pearl fishing continues^{vi}.

WCCAG review

The WCCAG undertook a conservation scoring assessment for FWPM crime. Criminal activity affecting Freshwater Pearl Mussels is rare, but each incident has a severe and disproportionate impact. Deterrence and detection are difficult given that offences generally occur in remote and inaccessible areas. The focus remains on prevention through awareness raising, reporting and proactive policing operations.

It is recommended that FWPM crime is retained as a UK wildlife crime priority for 2020-2022.

Case Study – Fresh Water Pearl Mussel investigation, Scotland^{vii}

In June 2018, a fisherman came across a pile of more than 50 discarded shells lying on the bank of the River Spey in Scotland. Local Police Officers attended the scene in company with the water bailiff and ultimately more than 80 good size shells were recovered. All had their backs broken, were wide open and most still contained their mussel. They appeared very fresh and it was suspected the crime had occurred very recently.

Following DNA examination of a cigarette butt left at the scene, a 72 year old man was identified from the DNA database. Checks on the man's name hit against a newspaper article that related to an Inverness Court case against one of his family members who had been accused of illegally catching fresh water pearl mussels from the River Spey over 20 years previously!

Application was made for a search warrant for the home address of this identified male and it was executed in December 2018. Recovered within the house were six pearls of different sizes. A statement was obtained from an expert witness who was shown the six pearls and he confirmed they were Scottish Fresh Water Pearls (*Margaritifera margaritifera*). He estimated the largest pearl could have been in the mussel for up to 25 years and the smaller one's between five-ten years.

Both the subject and his wife were arrested and charged with sec 9 (1a) and sec 9 (2) of the Wildlife & Countryside Act 1981. The court case eventually took place (via virtual court) in August 2020. The 70 year old female stood trial on the charges listed above. She was acquitted. The sheriff accepted her husband's evidence that he had inherited those six pearls from his parents and no further action was taken.

Poaching – Deer

Deer poaching is the illegal or unauthorised hunting of deer. It is carried out in a variety of ways including shooting at night under spotlight (lamping) and illegal hunting with dogs.

Day poaching

Under section 30 of the Game Act 1831 it is an offence for any person to trespass in the daytime by entering or being upon any land in search or pursuit of game, woodcock, snipe or rabbits. Daytime is one hour before sunrise to one hour after sunset. Trespass means a physical entry by a person onto land without permission. For the purposes of poaching law a person shooting or sending a dog from the public road or footpath is a trespasser.

Night poaching

Under the Night Poaching Act 1828 it is an offence at night to unlawfully take or destroy any game or rabbits on any land, open or enclosed, this includes public roads, paths and verges. Night is one hour after sunset to one hour before sunrise.

The trespassing on land with dogs to hunt game is an unlawful act under the Hunting Act 2004.

Poaching – Fish

It is an offence to take or destroy, or attempt to do so, any fish in water which is private property or in which there is a private right of fishery. This includes all forms of fish, whether game or coarse, and is covered by Schedule 1 of the Theft Act 1968. The Environment Agency and Natural Resources Wales are the governing bodies responsible for regulating and enforcing fisheries legislation in England and Wales respectively^{viii}.



Hare Coursing

Hare coursing is the pursuit of hares with sight hounds, which chase the hare by sight and not by scent. Hare coursing can take the form of organised events in which dogs are, by the use of live hares, assessed as to their skill at hunting hares. As well as being an issue of animal welfare, hare coursing can also have a wider impact. This can include vandalism of property, loss of income for farmers and landowners, theft, intimidation and road traffic issues including the driving of unlicensed and uninsured vehicles. Primarily there are three pieces of legislation which can be considered for charge i) Section 30 Game Act 1831, ii) Section 1 Night Poaching Act 1828 and iii) Hunting Act 2004. Hare coursing can cause significant disturbance in the countryside and is a cause of serious concern to those who live in rural communities^{ix}.

Hare coursing is seen by offenders as a sport. Hare coursing has strong links to organised crime, with farmers and land owners often being threatened and intimidated by the hare coursers, along with illegal betting taking place on the results of each race. It is a competitive activity where dogs are tested on their ability to run, overtake and turn the hare before finally catching it, this usually results in the death of the hare. As a result the winning dogs become very valuable to their owners. Hare coursers will travel great distances to carry out this illegal activity, they will travel to areas of the country where the land is flat and when the crops in the fields are low, and this is normally in rural areas^x.



MoRiLE review

The NWCUC undertook a MoRiLE scoring assessment for Deer Poaching, Fish Poaching and Hare Coursing in consultation with key members of the Poaching PDG and other partners. The Impact & Harm, Likelihood and Organisational Position scoring remain significantly high. Deer Poaching, Fish Poaching and Hare Coursing all continue to be key elements of the Poaching PDG¹⁶ and excellent progress continues with the PDG setting specific three-year targets and producing a detailed delivery plan.

It is therefore recommended that Poaching (Deer, Fish and Hare Coursing) is retained as a UK wildlife crime priority for 2020-2022.

¹⁶ For both England & Wales and Scotland

Raptor Persecution

All birds of prey are fully protected under the Wildlife & Countryside Act 1981. Offences include the killing, taking and injuring of birds and eggs, damage and destruction of nests. There are also offences relating to possession, sale and prohibited methods of killing and taking. Trade offences relating to raptors are also covered by the Control of Trade in Endangered Species (Enforcement) Regulations 2018 (or 1997). Offences involving the abuse of pesticides are covered under various pieces of legislation^{xi}.

WCCAG review

The WCCAG undertook a conservation scoring assessment for Raptor Persecution. The WCCAG recognised that the Raptor Persecution PDG's are very active, with a significant on-line presence raising awareness of raptor persecution and encouraging community engagement in prevention activities.

In previous years WCCAG identified species particularly threatened by raptor persecution. However, it is now thought that targeted enforcement over crime and incident 'hotspots' may be a more effective approach. Both the report from the raptor persecution PDG and the findings of JNCC indicate that the affected species are not necessarily specifically targeted and removal of potential predators of grouse is, for the most part, indiscriminate. For species such as the Hen Harrier, whose primary habitat and territories coincides with the managed grouse moorlands, the impact significantly increases. It was agreed that raptor persecution should continue to be addressed with a focus on hotspot areas rather than specific species. Although, five species scored highly against the criteria in the WCCAG matrix so they are regarded as in need of particular attention, to help drive action and encourage community engagement in key areas. These are shown overleaf:

1. Hen Harrier

The species has an extremely low population in the UK and any death causes a significant setback to population recovery. The southern reintroduction through Defra's Hen Harrier Action Plan is continuing. Scotland has had some success with Hen Harrier monitoring schemes and more estates are willing to come on board.

2. Golden Eagle

Population modelling indicated that persecution is responsible for an estimated 3–5% of annual deaths of adult Golden Eagles. In the absence of this mortality, the Scottish population in particular, would increase.

3. White-tailed Eagle

Despite successful reintroduction programmes and a local population increase in the UK, the White-tailed Eagle is classified in the UK as Red under the Red List for Birds. Increasing population in Scotland is causing more human-wildlife conflict. Ongoing monitoring and management measures are considered imperative to maintaining population growth.

4. Goshawk

Goshawk persecution appears relatively limited although anecdotal evidence suggests expansion of the species range from core areas is limited by persecution. The main threat is considered to be females being taken from the nest, potentially for laundering or inclusion in falconry breeding programs for export to the Middle East.

5. Peregrine Falcon

The main threats for peregrines are conflict with pigeon racers and theft from the nest. Domestic persecution interacts with the CITES priority of illegal trade in raptors, where there are concerns about laundering wild specimens into the falconry breeding programs for export to the Middle East.

Red Kites were previously identified as a key species at risk. However, the WCCAG score for Red Kite was reduced and it should no longer be a priority species, given the significant population recovery. Any on-going incidents of illegal killing will be covered by the 'hotspot' approach.

Short-eared Owl has been flagged as being a species of concern, however evidence of illegal killing is poor. Incidents of illegal killing will be covered by the 'hotspot' approach so no specific further action is recommended at this time.

It is recommended that Raptor Persecution is retained as a UK wildlife crime priority for 2020-2022.



Focus on Raptor Persecution Risk Mapping

In 2018, the NWCUC produced a series of Raptor Persecution risk maps in order to increase crime prevention opportunities for the [South of Scotland Golden Eagle project](#). The project was a high profile conservation scheme to release Golden Eagle chicks each year for a five year period in the Scottish Borders region to repopulate the area. The project was awarded £1.1m from the Heritage Lottery Fund and is led by Nature Scot, with the support of RSPB, Scottish Land & Estates, Buccleuch Estates, Southern Uplands Partnership and Forestry Commission Scotland with a Project Manager appointed to oversee operational matters. For each year of the project, up to ten Golden Eagle chicks will be taken from nests elsewhere in Scotland and relocated to the Borders. Each young bird will be fitted with a satellite transmitter so they can be monitored by the Project Officer who then informs partners of the birds' movements, which allows for an early warning if the birds are flying into high risk areas for persecution.

In late 2019, the NWCUC repeated the risk mapping analysis for Police Forces in the South of England who were likely to have newly released White-tailed Eagles over their area. The [White-tailed Eagle Reintroduction on the Isle of Wight](#) is a partnership between Forestry England and the Roy Dennis Wildlife Foundation with support from conservation organisations and other key stakeholders. The Natural England licence permits the release of up to 60 juvenile eagles on the Isle of Wight over a five year period from 2019. It is hoped that a small population will become established on the Isle of Wight and in the wider Solent area, with birds spreading east and west along the South Coast thereafter.

Golden Eagles and White-tailed Eagles have few predators but it was recognised that some of the released eagles from each project will be at risk over areas of land where raptors have previously been persecuted. The media interest in crimes against eagles is enormous. Any incident will make national headlines with subsequent pressure and scrutiny applied to both Government and the Police. Both projects recognised that illegal raptor persecution could lead to some of the eagles dying due to unlawful practices. To provide the best opportunity for the projects to succeed, measures to reduce illegal practices - that present a risk to the eagles in relevant regions - are considered essential. The NWCUC produced the risk maps to demonstrate the areas that pose most threat to these eagles. Police forces across the risk areas were asked to plan early and put in place robust crime prevention measures in the risk areas highlighted - in association with partner agencies wherever appropriate.

To ensure the risk maps were as comprehensive as possible, the NWCUC undertook Crime Pattern Analysis, utilising data going back 10 years and including all known persecution incidents recorded by a number of partner agencies including RSPB, police forces, and WIIS¹⁷ data.

¹⁷ Wildlife Incident & Investigation Scheme

Non-priority wildlife crime issues

The NWCU incorporate non-priority wildlife crime issues within the MoRiLE review process. Specifically, intelligence analysis and a scoring exercise were conducted for Finch Trapping¹⁸, Egg Theft¹⁹ and Non Native Species²⁰:

Finch Trapping

Although environmental impact and volume levels are thought to be moderate, there is an indication of organised criminality evidenced through recent investigations. In 2019, the RSPCA worked in partnership with the Metropolitan Police on [Operation QUILL](#). Several suspects were arrested, birds seized and convictions obtained. Learning points from Op QUILL were cascaded to wildlife crime officers at the 2019 National Enforcers Conference. RSPCA confirm they have sufficient organisational capability, at this time, to deal with Finch Trapping with uniform inspectors investigating directly.

Egg Theft

Volume of egg theft offences are currently low, however there can be an impact on endangered species and there is known international trade on the internet. The NWCU continue to identify the UK's main egg thieves under Operation EASTER. Organisational capacity to investigate offences is sufficient, with RSPB and police collaboration.

Non Native Species

The introduction of invasive non-native species can have critical impact on the environment. Public interest is high and there is national political interest. There may also be significant financial pressures on impacted land owners. The Invasive Alien Species (Enforcement and Permitting) Order 2019 has introduced a raft of new offences concerning invasive species, including restrictions on the sale, breeding, keeping, release and transport of 66 invasive species and the number of species on the list is expected to grow in future. Defra have indicated that preventative measures to stop the spread of non-native species will be far more cost effective for the UK over the financial burden that ensues when an established species has to be eradicated. The NWCU have extended an invite to the Defra non-native team to attend the Cyber Enabled Wildlife Crime Priority Delivery Group so capacity for research into on-line trade in non-native species can be explored.

At this time, the Impact & Harm, Likelihood and Organisational Positions do not score significantly high to warrant any of the above issues being elevated to priority status.

¹⁸ In consultation with RSPCA

¹⁹ In consultation with RSPB

²⁰ In consultation with Defra

Organised Illegal Hunting with Pack Dogs

The Hunting Act 2004 bans the hunting of wild mammals (notably fox, deer, hare or mink) with dogs in England and Wales. Trail and drag hunting (where the hunt follows an artificial scent laid out in a trail) is legal. Dogs can be used legally as part of a trail or drag hunt. Dogs can be legally used to 'flush' a fox from cover so it can be shot. However, it is an offence to: Engage or participate in the pursuit of a wild animal; Use or allow a dog or dogs to pursue a wild animal; Knowingly allow land to be entered for the purpose of hunting a fox or Hunt foxes with dogs. There are exemptions under the Hunting Act 2004 which allow for wild animals (including foxes) to be 'humanely' killed^{xii}.

The NWCU recognises that Organised Illegal Hunting with Pack Dogs is a significant issue for PWCO's in England & Wales so as part of this strategic cycle, a MoRiLE scoring assessment was undertaken in consultation with key partner agencies. The scoring exercise was done with a focus specifically on 'Organised Illegal Hunting with Pack Dogs' to ensure a clear differentiation between this issue and other illegal activity that is already covered by existing Priority Delivery Groups (particularly in relation to Hare Coursing). Inclusion within the thematic area of Organised Illegal Hunting with Pack Dogs is the illegal hunting, on foot or horseback with a pack of dogs, in pursuit of Fox, Deer, Hare or Mink.

Further clarity around the thematic area is required, so it is recommended that a Working Group is commissioned to fully determine knowledge gaps. The group should incorporate Police, partner agencies (pro and anti-hunt), training providers and CPS - to tackle this thematic area from all perspectives. The group would ensure delivery against key objectives to reduce violence associated with hunts, reduce policing costs and restore community confidence for the benefit of lawful sporting, public safety and community harmony whilst protecting UK wildlife.

Emerging threats

The NWCU consulted with all PWCO's in the UK to assist in the identification of emerging threats for this strategic cycle. Several issues were raised during the consultation:

Cruelty and Shooting

Increased levels of cruelty and shooting were reported by many Police Forces in England. Target species mainly appear to be birds and waterfowl with reports of persons catapulting birds for 'fun', targeting birds with air rifles, and the killing of ducks and swans. There are also frustrations with perceived lack of support for effective enforcement when the targeted species are those commonly regarded as 'pests', such as pigeons or corvids. True levels of cruelty and shooting are extremely difficult to assess but the volume of intelligence initially scoped on PND indicates the issue is widespread. The NWCU do not have the capacity to capture the volume of cruelty/shooting incidents with keyword searching so it is **recommended that the unit works with PND developers to identify suitable wildlife crime markers and subsequently push the use of markers to all PWCO's and force intelligence teams.**

Community tension

The threat posed by wildlife criminals is also a significant contributor to community tension. In particular there has been a reported increase in intelligence relating to 'saboteur' type activity. There is a significant risk that wildlife crime community tensions will either escalate into violence or translate into a fear of reporting crime due to intimidation and threat.

It is recommended that NWCU seek to collate and disseminate good practice policies from Police Forces with expanded Rural Crime teams to assist other forces build evidence based assessments on the costs and benefits of these teams. Forces can submit these assessments to their Police Crime Commissioners (PCC's) to draw attention to the associated benefits that expanded Rural Crime teams will bring to the community, ensure local response to wildlife crime has an increased capacity to engage with protest groups, encourage members of the public to report wildlife crime and tackle local community tensions before they escalate into violence or criminal damage. This will also assist forces to deliver the objectives within the NPCC Wildlife Crime Strategy 2018-2021 which all PCC's have signed up to.

Focus on Illegal Wildlife Trade

Reports that the Covid-19 outbreak originated from illegally sourced wildlife has brought about a significant and increased global interest in the Illegal Wildlife Trade (IWT). IWT is an international organised crime which is often cited as being the fourth biggest illegal trade in the world, worth over an estimated £15 billion annually^{xiii}. There is a large UK market for exotic species and the trade takes many forms such as taxidermy, skulls, plants and bones as well as tusks, teeth, feathers, skins and claws. Much of the UK trade is conducted via on-line platforms and the opportunities to buy and sell over the internet has opened the trade to a global customer base. The use of on-line sales platforms create a volume of legal trade amongst which illegal items can be sold. The NWCU has evidence of UK wildlife trade offences involving money laundering where illegal sale profits are hidden.

Despite the investigative knowledge that has been gathered to date, there is still a considerable intelligence gap within the UK in relation to the scale and distribution of the illicit financial flow from IWT trade. Although there have been notable successes in combatting IWT offences in the UK, and there is undoubtedly a knowledge and skill base within the current law enforcement establishment (primarily the NWCU and the Border Force CITES Team), the capacity to identify and investigate the most serious and organised IWT is significantly impaired by lack of capacity. Intelligence disseminated internationally in relation to IWT links across the world has not had consistent take up.

There have been a number of occasions where NCA have investigated IWT matters and some of these have resulted in effective prosecutions²¹. However, the NCA have other significant priority areas which they must focus their resources on so the vast majority of IWT investigations fall back onto the constraints of the owning police force.

In order for the UK to adequately tackle IWT offences there must be a consistent coordinated approach between the NWCU, Border Force and the NCA. A clear investigative pathway needs to be identified to ensure the NWCU and Border Force investigators have formal access to the organisational capabilities of the NCA. This would ensure serious and organised IWT can be effectively identified and investigative linkage between IWT and 'traditional' OCG's can be analysed. This will also ensure the intelligence gap in relation to illicit financial flows can be addressed within the UK and provide additional opportunity for POCA confiscations.

²¹ See www.NCA.Khoo and www.NCA.owls and www.NCA.Stocks

WCCAG - emerging threats and concerns

The WCCAG identified the following as areas of emerging concerns in need of further attention by the UKTCG:

Illegal use of lead shot (impact on water birds)

The illegal use of lead shot in the UK is likely to be having a significant negative impact on the favourable conservation status of waterbirds across the UK. Without enforcement, the situation is highly unlikely to change. Wildfowl impact from lead shot was raised as an emerging threat by the WCCAG. The differing Regulations between England & Wales and Scotland cause some confusion but research indicates offences are widespread and increasing. There is a clear impact on the conservation status of species. There is currently no enforcement of the legal restrictions on the use of lead shot on waterbirds and over wetlands across the UK. The WCCAG has considered the conservation impact associated with the use of lead shot and the necessity for police intervention. **It is therefore recommended that a working group is set up to consider the issues around improving enforcement of the restrictions on the use of lead shot.**

Reptiles

For reptiles, low-volume trade in rare, highly endangered species that are protected in their natural ranges is of particular concern. UK traders often buy and sell stock at large fairs such as Hamm. On-line trade has become a major component of global reptile sales. With current Covid-19 restrictions, fairs like Hamm have not taken place and are unlikely to be held in the forthcoming year, amplifying on-line trade, including from other EU Member States and the wider international community.

Rosewoods and Aquilaria

Timber represents 8% of seizures. Timber remains a priority but WCCAG had agreed to focus on Rosewoods and Aquilaria. There needs to be awareness amongst traders that certificates are required for *Dalbergia nigra* (listed in Appendix I/Annex A). Paperwork is often missing or incorrect. It is difficult to identify rosewoods to species-level for musical instruments. Some rosewood from Madagascar enters Europe illegally. There is a current suspension of commercial trade in specimens of the species *Dalbergia* spp. from Madagascar until further notice, with the exception of *Dalbergia* spp. products which had been produced, registered and authorised for export prior to 2 January 2017²².

²² https://www.speciesplus.net/#!/taxon_concepts/23766/legal

Illegal Trade in Raptors

Illegal trade in raptors to the Middle East is a growing concern. There is an identified risk that wild UK populations are being targeted for chick/egg theft and laundered into the lucrative legal trade where birds can sell for up to £250,000 in the Middle East. The true scale of the trade remains a key intelligence gap. There has been a significant increase in the number of breeders and of live falcons being exported to the Middle East. Furthermore, it is possible that pure-bred falcons are being purposely misidentified as hybrids in order to avoid the registration requirements and the increased scrutiny that would bring. The use of DNA fingerprinting to determine family relationships of captive-bred birds has the potential to be used to great effect to detect or confirm incidents of laundering of wild birds into captive breeding programs.



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 produced²³. 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 the 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 Police National Database (PND).
- Other information or data received from UK Law Enforcement Agencies.
- Other information received from partner agencies.

²³ 2018

Appendix B – WCCAG Scoring Matrix

The Wildlife Crime Conservation Advisory Group (WCCAG) is comprised of representatives from Defra along with:

UK Statutory Nature Conservation Organisations:

Joint Nature Conservation Committee

Natural England

Nature Scot

Department of Agriculture, Environment and Rural Affairs (DAERA Northern Ireland)

Natural Resources Wales

Other Statutory Agencies:

Animal and Plant Health Agency

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)

Relevant Non-Government Organisations:

Bat Conservation Trust

RSPB

TRAFFIC

WWF (on behalf of the Species Survival Network)

The Wildlife Crime Conservation Group (WCCAG) met on 4th February 2020²⁴ 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, as shown overleaf.

WCCAG agreed the following criteria²⁵ for identifying conservation priorities:

1. The feature of conservation interest is known, or is believed or suspected, to be subject to significant and persistent criminal activity, and
 - (a) Such criminal behaviour may prevent the feature of conservation interest from being maintained at, or recovering to, favourable conservation status²⁶, or
 - (b) Illegal trade to, from or via the UK is at a level which is likely to have a detrimental impact on wild populations of the species.
2. Action by enforcement agencies, through prevention, intelligence gathering or detection and prosecution of offences, is necessary to make a significant contribution to overall conservation efforts to maintain the feature at, or enable it to recover to, favourable conservation status.
3. The relevant features of conservation interest are also subject to complementary action to enhance their conservation status, such as through species recovery programmes or similar with co-ordinated actions involving numbers of partners.

²⁴ CITES sub group met 29th November 2019

²⁵ To be scored objectively against the criteria giving consideration to whether the criminal activities associated with the species still required an immediate and UK-wide tactical response, and what obstacles to reducing the associated threat still existed, and where police effort would be best focused in preventing / enforcing wildlife crime

²⁶ For example, the feature being prevented from occupying its full geographic range or by suppressing populations to below a natural carrying capacity.

The definition of 'Favourable conservation status' is derived from Article 1 of the Habitats Directive, namely:

The conservation status of a natural habitat will be taken as 'favourable' when:

- *Its natural range and areas it covers are stable or increasing, and,*
- *The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and,*
- *The conservation status of its typical species is favourable as defined in (i) [i.e. below].*

The conservation status of a species will be taken as 'favourable' when:

- *Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and,*
- *The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.*

References

i	The recording of Wildlife Crime in England & Wales, reviewing the effectiveness of current practices
ii	Wildlife & Countryside Link Annual Report 2018
iii	RSCPA and North Yorkshire Police. Charted by NWCU
iv	Wildlife & Countryside Link Annual Report 2018
v	Wildlife & Countryside Link Annual Report 2018
vi	Nature Scot
vii	Police Scotland
viii	BASC: Poaching of Game, Deer and Fish
ix	Crown Prosecution Service, England & Wales
x	Lincolnshire Police, National Approach to Hare Coursing project (E03)
xi	Wildlife & Countryside Link Annual Report 2018
xii	Metropolitan Police
xiii	WWF

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