

Strategic Assessment – 2022

National Wildlife Crime Unit (NWCU)

Public Version



uk|National Wildlife
Crime Unit

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Executive Summary

The seven UK wildlife crime priorities for 2022-2025 should remain the same as in the 2020 strategic assessment. The conservation priorities are bat crime, Convention on International Trade in Endangered Species (CITES), freshwater pearl mussels and raptor persecution. The non-conservation priorities are badger persecution and poaching (including hare coursing, deer poaching and fish poaching). Cyber related wildlife crime remains a separate priority, although this is also a cross cutting theme with cyber enabled criminality being an important factor across all of the other priorities.

WILDLIFE CRIME PRIORITIES



The sub-categories for the CITES priority have primarily remained the same, with an alteration to include beauty within the health and medical products. The Wildlife Crime Conservation Advisory Group (WCCAG) have highlighted caviar and stony corals as emerging issues.

CITES SUB-PRIORITIES



Although the seven areas will remain as priorities there are several other wildlife themes assessed and highlighted as future risks and/or areas of concern. These are detailed further within the report and include, but are not limited to, marine disturbance, non-native species and hunting with hounds.

Recommendations – Strategic

The following recommendations have been identified across the wildlife crime priorities (both for conservation and non-conservation thematic areas) and for other issues raised within this assessment. Priority specific or species specific intelligence gaps and recommendations can be found within the relevant sections of the document.

1. Increase the priority status of wildlife crime and ensure consistent national approach to tackling and disrupting wildlife criminality.
2. Build on current partnership working and stakeholder engagement for a more co-ordinated response nationally through Priority Delivery Groups (PDGs), working groups and national operations.
3. Develop an improved centralised and accepted dataset for wildlife crime. Make wildlife crimes Home Office notifiable and/or ensure consistency in reporting and recording onto the Police National Database (PND).
4. Enhance support and training for Wildlife Crime Officers (WCOs) / first responders. Ensure they have tools available to effectively tackle wildlife crime and minimise missed opportunities, i.e. toolkits.
5. Develop a smartphone App for WCOs to access toolkits and guidance documentation in live time when at wildlife crime scenes.
6. Develop a consistent national accredited training course for WCOs. Additionally, encourage all forces to consider including wildlife crime awareness packages in probationer training.
7. Review existing wildlife crime legislation, including penalties, to improve prosecution consistency and success.
8. In line with the NPCC strategy for wildlife crime, the strategic review period to be extended to three yearly.
9. Ensure future Strategic Assessments take a more holistic approach with a wider consideration of themes in order to determine priorities, whilst still acknowledging the issues of note that are species specific.



Aims & Objectives

The main aim of this document is to provide a strategic overview of the current picture of wildlife crime in the UK since the last assessment in 2020. This informs the UK Tasking & Co-ordination Group (UKTCG) - chaired by the National Police Chiefs Council (NPCC) lead for wildlife crime - as to the current threats, risks, concerns and emerging issues. This aids the decision making process with recommendations considered for appropriate action to effectively tackle and disrupt wildlife crime. The UKTCG ratifies the areas to become national wildlife crime priorities for the next strategic period. The objectives are to:

- 🦅 Prioritise the most harmful wildlife crime issues within the UK.
- 🦅 Review and assess the current conservation and non-conservation priority areas to understand the present threat and to ascertain if they should remain a priority business area. This assessment is based on specific recent intelligence and information obtained from a range of available and appropriate sources.
- 🦅 Assess other non-priority thematic areas in a systematic way to be consider raising as a priority or as a working group where appropriate.
- 🦅 Ensure stakeholder and partnership input is integrated within the assessment process utilising the knowledge and experience of subject matter experts (SME).

Methodology

Conservation Priorities

The Wildlife Crime Conservation Advisory Group (WCCAG) advise the UKTCG on the impact of crime and conservation status of protected species and/or habitats. Members of the WCCAG are from statutory nature conservation agencies, other statutory agencies, enforcement authorities and relevant non-governmental organisations (NGOs). The WCCAG assesses and identifies conservation priorities and CITES conservation

priorities in the UK. This is completed through the WCCAG scoring matrix and each area is assessed on three criteria; Impact, Enforcement and Action (as shown below). A review and update of the scores for the conservation priorities reflects the current picture, with those scoring highest deemed priority areas.




Score Level	Impact: Favourable Conservation Status (FCS) / Illegal Trade (Impact)	Enforcement Necessary (Enforcement)	Complementary Actions (Action)
4 Very High Concern	Criminality is a/the major factor detrimentally affecting conservation status.	Without enforcement the situation is highly likely to change. A key response.	Wide range of planned actions. Commitment from government and NGOs using a full suite of responses.
3 High Concern	Criminality is having a significant detrimental effect on conservation status.	Enforcement desirable and will have a significant effect to achieving conservation objectives.	Significant action to tackle the problem. Commitment evidenced. National action plans or similar devised.
2 Medium Moderate Concern	Criminality contributes to the conservation status.	Enforcement would be useful contribution to conservation objectives.	Active action to raise awareness contributes to the solution.
1 Minor Concern	Criminality has a minor impact on favourable conservation status, but other issues of more importance.	Enforcement would have a minor beneficial effect on conservation objectives.	Some minor action to heighten awareness but little else.

Non-Conservation Priorities

All other thematic areas not identified as being of conservation concern are scored utilising the Management of Risk in Law Enforcement (MoRiLE) assessment tool. MoRiLE allows a consistent and systematic approach to assessing and identifying priorities. Each thematic area is assessed against the same set of criteria with rationale recorded - allowing the decision making process to be transparent and minimise bias. Once assessed each thematic area will have a risk score and organisational risk indicator (ORI) and these will highlight the current non-conservation wildlife crime areas/concerns to be prioritised. The MoRiLE assessment utilises available

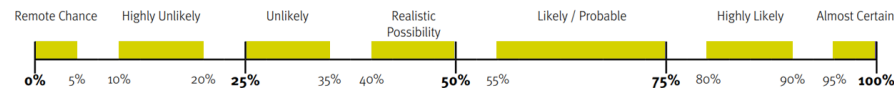
and suitable data sources, including but not limited to; the NWCU Wildlife Intelligence Database (WID), the UK wide policing intelligence database (known as PND) and other information/data from law enforcement, partner agencies and NGOs. Relevant stakeholders for each thematic area are involved in the moderation process to add context to the rationale before assessment and scores are ratified.

MoRiLE scores are calculated across three areas:

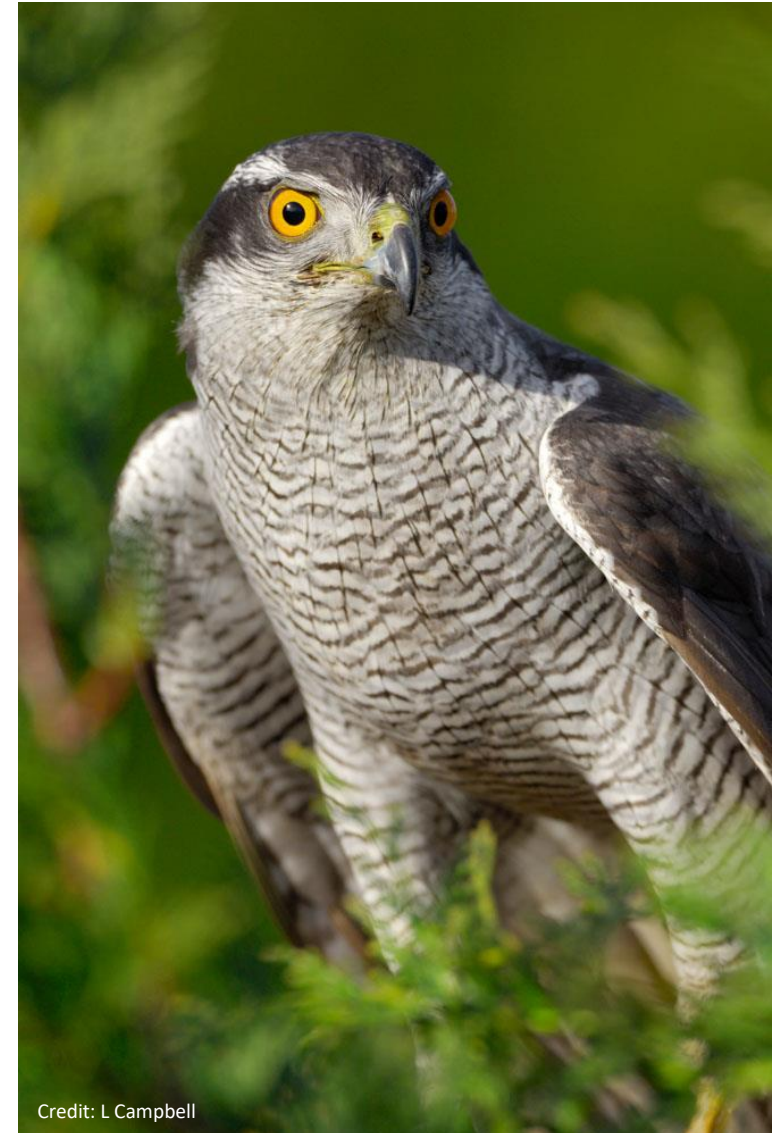
-  **Impact and Harm** (victim, community and environment)
-  **Likelihood** (frequency, volume, trend and forecast)
-  **Organisational Position** (public interest, reputation and politics, economic cost, capacity and capability)

Probability & Confidence

Throughout the assessment the established 'probability yardstick' will be used to ensure consistency when assessing probability across the different priority areas. The following graphic defines the probability ranges when such language is used and the table details the confidence level of statements.



Confidence Statement	
Language	Evidence
High Confidence	Good quality and/or corroborated from a range of different sources, or situations where it is possible to make a clear judgement.
Moderate Confidence	Open to various interpretations, or credible and plausible but lacks corroboration.
Low Confidence	Scant or very fragmented, and/or based on sources of suspect reliability.



Credit: L Campbell

Strategic Overview of Wildlife Crime

Flora and fauna are incredibly important for the health of our planet and our ecosystems are delicately balanced. Wildlife crime poses a significant threat to this from a local level through to national and international activity that can span many national borders. It is therefore necessary to have a co-ordinated approach to tackle wildlife crime.

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 flora and fauna, including species traded in the UK. It is estimated the illegal wildlife trade is worth up to £17billion a year and is a significant (4th largest) serious and organised crime generator - after drugs, firearms and human trafficking¹. Wildlife crime can significantly impact the conservation status by pushing species closer to extinction and can cause pain and suffering to animals. A specific wildlife crime activity can also be linked to other serious and/or organised criminality.

The UK Government is subject to international obligations to ensure wildlife crime is effectively investigated. The police lead on law enforcement and aim to achieve this whilst balancing conflicting priorities, reduced budgets and limited resources. In order to disrupt and tackle wildlife crime effectively, available resources need to be focused to deal with issues likely to have the greatest impact and result in positive effects for wildlife, but also taking into account other factors such as the community and public interest. Border issues between Northern Ireland and the Republic of Ireland as a result of EU-exit continue. This is a risk



factor in relation to wildlife crime as this border is also an external EU border.

WCCAG Summary

The WCCAG meeting held in February 2022 reviewed and scored conservation priorities; this led to some score changes, although there is no change to the taxa that remain as conservation priorities since the last assessment. These are [bat crime](#), [freshwater pearl mussel \(FWPM\)](#) and [raptor persecution](#). The five highest scored bird taxa under raptor persecution and of greatest conservation concern are goshawk, golden eagle, hen harrier, peregrine falcon and white-tailed eagle.

The WCCAG also review the existing CITES wildlife crime priorities, these are to remain the same and are; [beauty, health & medical products](#), [European eel](#), [illegal trade in raptors](#), [ivory](#), [reptiles](#) and [timber](#). The Health and Medicinal category has had beauty products added since the last assessment. In addition, the WCCAG have raised two additional thematic areas as emerging issues, these are caviar and stony corals.

The following additional points arising from the WCCAG are discussed in more detail in subsequent sections within this assessment:

- 🦉 [European eel](#) - a species highlighted within the CITES section of concern.
- 🦉 Marine issues - specifically concerning [marine disturbance](#).
- 🦉 The [illegal use of lead shot](#) and the negative impact upon the favourable conservation status of water birds.

WCCAG scoring summary tables of the priority thematic areas can be found in the [Appendix](#).

MoRiLE Summary

The scoring of non-conservation thematic areas using MoRiLE highlights the previous strategic priorities set in the 2020 assessment should remain, these are; [badger persecution](#) and [poaching \(including deer and fish](#)

¹ [Wildlife crime – \[Interpol.int\]](#)

[poaching and hare coursing](#)). These thematic areas have a risk score >70 and organisational risk indicator (ORI) scores of 4. A MoRiLE scoring summary table of thematic areas can be found in the [Appendix](#).

Two other thematic areas are of particular note and a summary of these issues can be found in the non-priority issues of concern section, these are; [hunting with hounds](#) and [non-native species](#). Hunting with hounds scored 5 - very high for ORI, but the risk score was lower than the current set priorities. The non-natives species risk score is >100, however the ORI score is low at 2. Therefore, neither have been raised to become new priority areas.

Covid-19 Pandemic

The global pandemic resulted in major changes to everyday life and a shift in offending patterns due to restrictions imposed – i.e. international illegal trade impacted due to restrictions on transport modes and routes. Wildlife crime on the whole has had a perceived increase during this period potentially due to several factors; increased awareness of environmental/wildlife issues resulting in increased reporting, increased interaction between wildlife and humans and the increased online and cyber enabled aspect to offending. The pandemic restrictions didn't significantly impact on how and why offences within the UK were committed. As restrictions eased criminals may have stuck with new methodologies to operate or may have returned to previously effective modus operandi. The other significant ongoing and increased concern is the risk of zoonotic disease transfer from animals to humans. With the current and increased levels of exploitation of natural resources and wildlife it is a highly likely to be an issue again in the future.

NPCC Wildlife Crime Strategy²

The purpose of the NPCC strategy is multifaceted and the aims of the 2018-2021 strategy were to:

- ✔ Enhance the conservation of wildlife.
- ✔ Develop strong partnership and stakeholder working.
- ✔ Raise awareness of wildlife crime.
- ✔ Embed a wildlife focus into policing culture.
- ✔ Improve wildlife crime legislation with proportionate sentences.
- ✔ Secure future funding for the NWCUC.
- ✔ Develop information sharing agreements with key stakeholders.

Although there have been great strides in progressing these aims there are still opportunities to improve and better tackle wildlife crime. The NPCC Wildlife Crime Strategy is currently being reviewed. This has included in-person consultations, a survey of enforcers, partners, and stakeholders and discussions with government agencies and funding bodies. The review will also link with the Rural Affairs Strategy.

NPCC Wildlife Crime Strategy Survey

The NPCC Wildlife Crime Strategy Survey conducted in 2022 received a total of 189 responses from across police and partners working within the wildlife crime arena. The majority of respondents (64%) were WCOs.

The vast majority (83%) of respondents agree that within the last three years the profile of wildlife crime has been raised across the UK. The proportions of forces/organisations that have set wildlife crime objectives or adopted a problem solving approach to wildlife crime are 69% and 70% respectively. These results indicate there is scope to homogenise objectives and support partners to adopt a problem solving approach.

² [NPCC Wildlife Crime Policing Strategy 2018 2021.pdf](#)

Survey results indicate there is limited awareness of some national operations and working groups, specifically the newly launched hunting with hounds working group and newly reformed PAW. These variations are likely to be due to factors including, but not limited to, the effectiveness of the campaigns, cross over with individual's roles and remit (for both police and stakeholders) and the relevance to the type of criminality experienced in a given police force area.

Experience of intelligence sharing between agencies is mixed. The survey results suggest that intelligence sharing processes could be improved; in turn this may generate better opportunities to detect and prevent wildlife criminality.

The best practice toolkit and the practical 'hands on' crime scene training for each PDG area were ranked the top two key deliverables. Lobbying to make wildlife crimes notifiable ranked third. An enhanced cyber enabled wildlife crime capability is ranked fourth with the use of academia fifth.



WCOs answered further questions about their experience of investigations and nominals involved in wildlife crime. 90% of WCOs have identified wildlife crime nominals or groups who are also linked to other types of non-wildlife organised criminality. However, only 15% of WCOs said that they have worked with their local ROCU to investigate wildlife crime in the last three years. 21% used a Financial Investigator and 30% utilised cyber services to investigate a wildlife crime. Although these are low numbers, additional context is needed to identify if this is an indicator of missed opportunities, lack of resources, a capacity and/or capability factor or related to the local prioritisation of wildlife crime. It also needs to be considered these specialist resources are not appropriate for every

investigation. Respondents were also asked: "what three things would dramatically support you in delivering your wildlife crime policing service in 2022-2025?" The following word cloud highlights the responses to the question - with training being a key issue raised.



The NPCC will be utilising the results of the survey and preparing a revised wildlife crime strategy for 2022-2025. **It is recommended that the UKTCG strategic cycle is re-aligned to match the timeframe of the new strategy – allowing for three years to effectively tackle the newly formed objectives.**

ICCWC report 2021

The ICCWC toolkit report highlights the UK's primary enforcement focus is inward facing with most investigations relating to domestic flora and fauna. Most CITES related crime investigations refer to specimens originating from other countries, although the trade in UK sourced raptors and eels are of concern. The report noted a terrestrial fauna bias with an absence of representation for marine, plant or forestry issues. The current existing legislation in the UK is inconsistent and a harmonisation of the

different statutes is required to enable more effective prosecutions. If advanced techniques and detective capability are utilised this will enhance the UK's ability to achieve increased conviction and prosecution results. The following section [\[wildlife crime policing staff\]](#) provides context to the issues of policing wildlife crime across the UK. In addition, the current sentencing guidelines do not act as a deterrent to offenders and require strengthening to combat those who choose to commit wildlife crime.



The issues concerning data collection and analysis are related to inconsistent process across the UK, but also the level of unreported, undetected and unrecorded crime. Data ownership is held by a variety of agencies and the data which is used to inform the current picture of wildlife crime is collected for differing reasons. Incident data held by NGOs usually reflects a higher prevalence than law enforcement. The systematic crime recording practices in the UK are not applied to wildlife crime and therefore it is very difficult to accurately measure as the data is not easily extractable or comparable across the UK.

Wildlife Crime – Notifiable Offences

Wildlife crimes are not notifiable to the Home Office. If they were notifiable, our knowledge and understanding of the current picture of wildlife crime in the UK would be greatly enhanced. Several partner agencies have requested that the Home Office consider making a subset of wildlife crimes recordable and notifiable as per the recommendation in the ICCWC toolkit report.

Legislation

The current legislation covering wildlife crime in the UK creates challenges for law enforcement agencies; it differs across the UK and requires updating and consolidation. The Department for Environment, Food and Rural Affairs (Defra) have acknowledged there is a need to evaluate current legislation. Consolidation across the wide range of laws would improve how we tackle wildlife crime, but focus also needs to be on sentencing guidelines and penalties. The current penalties are not a deterrent for individuals committing wildlife crimes. In order to successfully elevate penalties, wildlife crime would need to be viewed differently - highlighting the serious and organised elements and the impact the activity has on communities. Changes to legislation that are politically charged or evoke strong responses (i.e. hunting) need to be considered carefully as current exemptions make law enforcement difficult and clarity is required.

In regards to Control of Trade in Endangered Species (COTES) Regulations in the UK - the offence of possession requires *proof of intent to supply* which differs from CITES legislation in other countries.

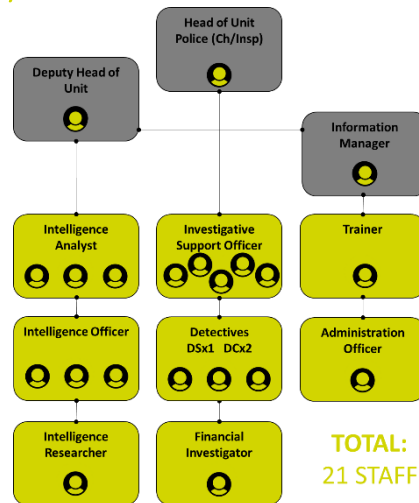
The amendments to the [Police, Crime, Sentencing and Courts Act 2022](#) includes details relating to wildlife crime (specifically hare coursing and other associated criminality). The amendments include:

- ✎ Increased penalty for offences related to game.
- ✎ Trespass with intent to search for or to pursue hares with dogs.
- ✎ Being equipped for searching for or pursuing hares with dogs.
- ✎ Recovery and disqualification order on conviction for certain offences involving dogs.
- ✎ Seizure and disposal of dogs in connection with disqualification order.

These additional powers will assist officers when responding and tackling these particular wildlife crimes. However, as wildlife crime is a complex issue, each case is fairly unique and requires detailed understanding of the possible legislation available when presented or responding to a wildlife crime.

National Wildlife Crime Unit (NWCU)

The future capacity and capability of the NWCU has been strengthened through additional short term funding. This has allowed the unit to expand and recruit for additional positions. These include an uplift in Analysts, Investigative Support Officers and Intelligence Officers but also includes new specialist roles such as a Financial Investigator, Trainer and a Detective capability. Once at full capacity (and all vacancies filled) the NWCU will have a total of 21 staff (an increase from 12).



Wildlife Crime Policing Staff

The roles and responsibilities of WCOs across the UK differ and this impacts on our ability nationally to tackle wildlife crime effectively. The following points highlight some of the issues and considerations related to WCOs that can make it difficult for enforcement:

- UK police forces have different organisational structures in place to tackle wildlife crime. The specific roles and responsibilities of WCOs varies, as do the processes for allocation and investigation of wildlife crimes. These differences do not necessarily identify an ideal standard - each have their own merits and are in place due to specific factors such as capacity, demand and resource restrictions.
- There are approximately 800 WCOs across the UK. However, not all forces have full time allocated WCOs - many are part-time or have wildlife crime duties as an add-on to full time operational roles. In addition, there is a high attrition rate amongst WCOs and because it is such a highly specialised area, the inconsistency can result in knowledge and skills gaps across many forces.

- Some WCOs are part of Rural Crime Teams with additional focus on other criminality including heritage and environmental crime.
- The status of wildlife crime is considered as a low priority compared to other criminality resulting in lack of support and resource allocation required to tackle and disrupt.
- Lack of unified training. NWCU addressing this by employing a trainer who will build upon the wildlife crime training that is offered to WCOs and ensure it is aligned to the NPCC strategy for wildlife crime. However, there is still a need for wildlife crime awareness to be highlighted within entry level (probationer) training.

Priority Delivery Groups (PDGs)

Each priority area has a PDG with an assigned plan owner and leads identified for prevention and enforcement. The NWCU lead on intelligence for every PDG. The purpose of these PDGs is to set specific aims and objectives related to their priority. However, overall objectives are:

- Raise the profile of wildlife crime.
- Increase awareness through partners, law enforcement agencies and the wider public arena.
- Identify and progress change (i.e. legislation).
- Respond to cross-border, national and international threats.
- Ensure intelligence sharing between stakeholders is effective at targeting and disrupting wildlife criminality.

A lack of standardised guidance for WCOs and investigators was seen as a barrier to successful enforcement. As a result, practical toolkits are being delivered by PDGs which support and upskill officers responding to wildlife crime - for example, by providing specific information regarding investigative opportunities at crime scenes or giving guidance for interviewing suspects. These have been developed in collaboration with stakeholder representation from the PDGs.



Wildlife Forensics

Officers attending a wildlife crime scene need to be alert to all potential forensic opportunities. Ideally the use of specialist crime scene investigators should be used but if they are not available, specialist sampling kits allow evidence to be properly collected and follow a strict chain of custody procedure to support the subsequent investigation. The [PAW Forensic Working Group](#) have developed a sampling kit and also provide detailed guidance for attendance at crime scenes and what evidence to look out for. This includes various evidential opportunities from; DNA, firearms, poisons to bite injuries, but also noting the importance of digital forensics – photographs and videos that are used to support prosecutions.

The Forensic Analysis Fund (FAF) offers financial support for forensic analysis during wildlife crime investigation and has been used to assist cases which would have otherwise failed to reach prosecution stage.

ZSL (Zoological Society London) hold a biological specimen database which could have potential use in wildlife forensic research. **It is recommended that the PAW Forensic Working Group link with ZSL to ascertain potential access to this biological specimen database as finding reference specimens is crucial for forensic casework.**

Future

The current wildlife crime priorities in most cases are species specific with the PDGs aims and objectives reflecting the observed issues and problems. However, there are many overlaps between the priority areas with some offenders targeting multiple species. In addition there are evident MOs which can impact several species i.e. the construction industry destroying habitats for badgers, great crested newts, field mice, bats or deer. Current targeting of nominals of interest is priority focused and there needs to be greater consideration for those committing multiple types of wildlife crime, those involved in serious and organised crime, and those making significant illicit financial gain from wildlife crime.

The aim of future Strategic Assessments will take a more holistic approach with a wider scope and consideration of themes in order to determine priorities, whilst still acknowledging the issues of note that are species specific.



Bat Crime – Conservation Priority

Current Picture – Key Themes

The UK is host to 18 species of bat. All bat species and their roosts are afforded protection under The Conservation of Habitats and Species Regulations (2017) and Wildlife and Countryside Act (1981). Bats roost in trees, the roof and wall spaces of buildings and underground sites such as caves and tunnels. As a result, bats and their roost sites can be particularly vulnerable to destruction by anthropogenic activity such as property development and tree felling [**High Confidence**]. Government agencies within the UK issue licenses to permit certain activities relating to bats and their roost sites. The licencing process requires specialist oversight by an ecological consultant, which in turn can have financial and time implications for projects.

Bat crime has been recognised as a UK wildlife crime priority since 2003.

There is a strong evidence base to suggest that development of land or property is the key driver of bat crime [**High Confidence**]. In 2021, 75% of bat related incidents reported to UK Police forces involved development of land or properties (BCT data) [**High Confidence**]. These types of incidents may also impact other protected species, such as dormouse or great crested newt. Trends with regards to bat incidents are relatively consistent over time, with incident reports peaking in the summer months [**High Confidence**]. Since 2012, an average of 135 incidents per annum have been recorded nationally.

75% BAT CRIME



Investigations

The Bat Crime Toolkit for investigators has been developed by the Bat PDG. The toolkit comprises tactical bat crime guidance, guide to Proceeds of Crime Act (POCA) applications, generic bat crime interview questions, a

ten-point investigators aide, a “bats and the law” document, an MOU and a flow chart for call handlers.

The prosecution of bat crime has challenges in common with other areas of wildlife crime, specifically:

- ✎ Crimes are summary offences and have a six month window for proceedings to commence.
- ✎ Summary offences carry lower penalties.
- ✎ Prosecution relies on expert testimony.

Despite these challenges, there has been recent success with the utilisation of POCA legislation.

Emerging Issues

Urban exploring is a term used to describe the exploration of man-made structures, particularly abandoned buildings. Many urban explorers document their activity on social media and have an online following [**Moderate Confidence**]. In recent months there have been several incidents where purported urban explorers have disturbed roosting bats. The current intelligence picture suggests that these types of bat disturbance offences are due to lack of awareness about legislation rather than deliberate acts of persecution [**Moderate Confidence**]. However, there is a potential risk that other content creators and urban explorers may seek out opportunities to film interactions with bats given the novelty factor of this content [**Low confidence**].

PDG

The Bat Crime PDG recognise the importance of effective partnership working to prevent the incidence of bat crime in the UK. The ICCWC Toolkit highlighted the value of this preventative approach, particularly those campaigns that inform developers/homeowners about their obligations regarding bats and bat roosts.

In the next strategic cycle, the PDG will utilise increased analytic capability to develop more evidence led prevention activity. Crime hotspot analysis

will identify opportunities to work more closely with specific partners and target messaging at the public.

Intelligence Gaps

- There is a relatively low volume of intelligence submissions relating to bat crime as criminality is not organised or attributable to prolific offenders.
- The majority of investigations are generated by reports from members of the public, including ecologists and local residents, rather than intelligence led operations.



Case Study³

Bellway Homes – Metropolitan Police – Bat Conservation Trust – December 2020

Bellway Homes was convicted of destroying a soprano pipistrelle roost at a construction site in Greenwich. Bellway Homes was ordered to pay a £600,000 confiscation order under the Proceeds of Crime Act. The developer was also ordered to pay court costs and went on to make a £20,000 voluntary donation towards the Bat Conservation Trust.

The developer was advised they would need a European Protected Species licence for demolition work. However, the developer proceeded with the demolition work without a licence, destroying the breeding site of soprano pipistrelle bats.

The penalty imposed in this case is the largest fine ever issued by a UK court in relation to wildlife crime.

WCCAG Summary: Bat crime to remain as a conservation priority for enforcement action after scoring review. Bat populations are currently stable or increasing, although current trends need to be considered in the context of severe historical declines.

Recommendation: Bat Crime to remain as a UK wildlife crime priority as the WCCAG have highlighted as a priority conservation issue.

³ [Largest ever fine for wildlife crime \[Bat Conservation Trust\]](#), [Bellway fined £600,000 for destroying bat roost - \[The Guardian\]](#)



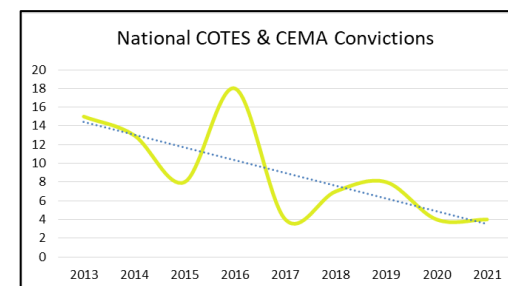
CITES – Conservation Priority

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, through its executive agency APHA, is the CITES management authority. Defra is advised by the scientific authorities, Royal Botanic Gardens Kew for plant matters and Joint Nature Conservation Committee (JNCC) for animal matters. APHA provides policy advice to the government on CITES and wildlife enforcement issues. It also issues import and export permits for species listed on the appendices of CITES and the annexes to the UK wildlife trade regulations as well as permits allowing commercial use of Annex A specimens (Article 10 certificates).

The convention is implemented through COTES (Control of Trade in Endangered Species) (Enforcement) Regulations 2018. The police have primary responsibility for enforcing the provisions of COTES. UK Border Force has primary responsibility for enforcing offences relating to imports and exports of wildlife contrary to the provisions in the Customs and Excise Management Act (CEMA) 1979 at the border. Other domestic legislation such as the Wildlife and Countryside Act 1981 play their part when offences relate to impact on UK species.

The adjacent chart highlights the number of COTES and CEMA convictions for the UK since 2013:



COTES and CEMA conviction levels have not exceeded those seen in 2016. Low levels have remained static over the last two consecutive years, which may be indicative of the fact that

wildlife crime, including CITES, is not a current priority for police forces. Another aggravating factor is the impact of Covid-19 restrictions on IWT and COTES/CEMA convictions.

The UK continues to be linked to the import and export of illegal wildlife products, and is also as a source country for some species (e.g. live raptors for the falconry trade and European eels for the Asian consumer market). The UK is also a transit and consumer market for a large number of CITES species.

There are numerous different themes that fall under the CITES umbrella, all of which present their own unique issues and key threats. To ensure that these themes are assessed appropriately, key themes have been looked at in isolation in order to identify the most prominent risks.

European Eel (*Anguilla anguilla*) Trade - CITES Priority

The current impact of the UK leaving the EU remains unknown. Prior to EU-exit there was unrestricted movement within the EU, whereas now any trade or restocking of eels requires a permit. The Covid-19 pandemic appears to have delayed the evaluation of these regulation changes.

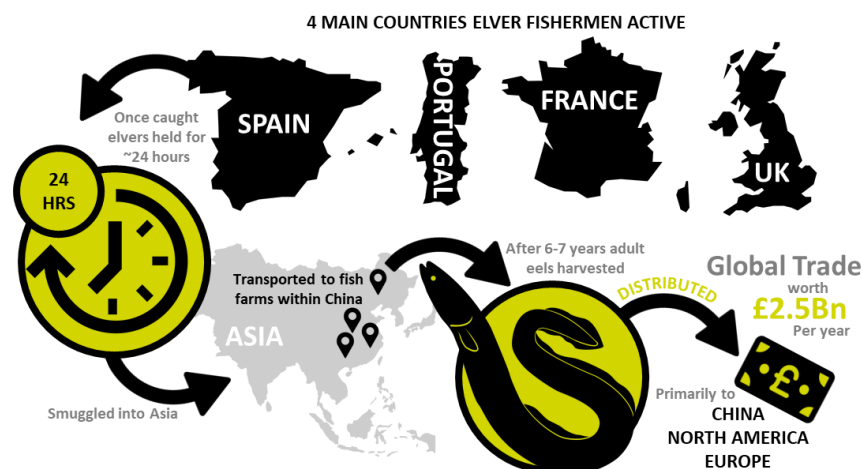
The illegal trading of European eels is an extremely lucrative business. The illegal global trade in eels is worth up to £2.5billion each year. Op LAKE is the European operation that has been adopted to try and tackle this trade.



European eel fishing takes place on the tidal sections of rivers on the west coast of the UK. The vast majority takes place on the River Parrett in Bridgewater, Somerset, and the River Severn in Gloucester, with small scale fishing on the River Wye in Gwent. There are a handful of fishermen who operate on rivers in Devon and on the Rivers Ribble, Lune and Dee. There are around 350 licensed fishermen in total, with a large proportion operating around Bridgewater and Gloucester. Elvers are also found in a number of other rivers in the UK, albeit in smaller numbers, although there are no licenses issued for elver fishing on any of these rivers **[High Confidence]**.

The UK elver fishing season is between February and May each year **[High Confidence]**.

Once eels are netted they are transported to storage facilities, where they are kept for approximately 24 to 36 hours. Following this settling period the eels are smuggled out of the UK **[High Confidence]**.



Illegal Trade in Raptors - CITES Priority

The last strategic period raised the illegal trade of raptors as a CITES priority issue. It was acknowledged that data barriers and issues within recording processes resulted in a true reflection of the trade not being captured. A continuation of these blockages has ensured that the significant intelligence gaps and scale of this theme remain largely undetermined **[High Confidence]**. The illegal trade in falcons, particularly peregrines, continues to be driven by a demand within the Middle East and the desire to have birds from wild stock **[Moderate Confidence]**. Currently, the volume of supply is potentially causing a glut in the legal market, which may result in a decrease in the sale value of birds **[Low Confidence]**.



Ivory - CITES Priority

Africa continues to be the key source for raw ivory. The demand for ivory in Asia is one of the most important drivers for high levels of elephant poaching and ivory trafficking. Intelligence levels surrounding ivory continue to be limited, and the threat to the UK from the wider trade continues to be low. **[Moderate Confidence]**.



Beauty, Health & Medicines - CITES Priority

Both Flora and Fauna derivatives continue to be seen within medicines, health and beauty products. It is currently unknown what environmental impact this has on the UK, and it is acknowledged that this is part of a wider global issue **[Moderate Confidence]**. The UK is an importing country of Beauty, Health and Medicines⁴ **[Moderate Confidence]**.



⁴ Border Force Strategic Assessment 2022



Timber - CITES Priority

During the last strategic period it was agreed that timber would remain a priority, but WCCAG determined that there would be a focus on Rosewoods and Aquilaria. Timber products have seen a significant rise in seizures from 2020 to 2021, particularly for agarwood **[High Confidence]**. The theme of smaller timber products - typically relating to musical instruments - has continued within this reporting period. It has been assessed that high volume imports of timber are being identified and managed appropriately at the border **[Moderate Confidence]**. In light of this, whilst it is recognised there is a demand for timber within the UK and that this is a current priority for Border Force, it does not currently represent a priority for UK policing or the NWCU.



Reptiles - CITES Priority

The import of reptiles into the UK are for both personal and commercial purposes. The personal demand surrounds individuals purchasing live reptiles as pets and accounts for 4% of reptile seizures. Commercial trade surrounds the import of derivatives and reptile parts and has three main strands; collectors (mainly skulls and shells), Beauty & Health (including herbal medicines), and the main consumer demand; fashion. Not only have reptile seizures accounted for the highest proportion of overall CITES seizures, they usually relate to bulk seizures rather than one or two units **[High Confidence]**.



Changes within the regulations surrounding the trade in reptiles changed once the UK left the EU. The effect of this has potentially been delayed due to Covid-19 and therefore the true scale and picture cannot be determined. It is anticipated that there will be a greater understanding during the next strategic assessment.

The illegal trade of live reptiles, parts and derivatives has also been linked to cybercrime, with the sale of reptiles on internet market places becoming increasingly more common. However due to the complexities of cyber enabled crime, the true scale is currently undetermined **[High Confidence]**.

Illegal Trade in Taxidermy (including skulls) – CITES Non-Priority

There are links to cybercrime, with online social and marketing platforms being utilised to advertise and sell products. Intelligence and seizures currently suggest that skulls are typically imported in bulk, but then sold on individually. A further risk, albeit seen within historical data, is that some parts/skulls are not being treated before entering the UK. Primate skulls being a specific issue - with some flesh still remaining on the bones. This highlights a potential threat of zoonotic disease being brought into and then transmitted within the UK.

Caviar - CITES Non-Priority

Limited data from both law enforcement and partnership agencies means that an accurate risk assessment cannot be determined. However there is a cross over with the beauty, health & medicines section as an increased use of caviar and sturgeon oil used is observed linked to high-end beauty products.

Stony Corals – CITES Non-Priority

Limited data from both law enforcement and partnership agencies means that an accurate risk assessment cannot be made. The only data available relates to historical offending as per the WCCAG summary.





Flora - CITES Non-Priority

Limited data from both law enforcement and partnership agencies means that an accurate risk assessment cannot be determined.

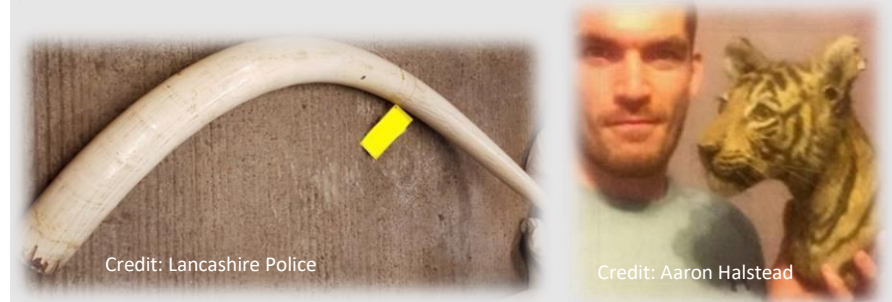
PDG

- ✎ The ongoing multi-agency response to the Global INTERPOL Op THUNDER has continued in 2021 and will be run again in 2022. This is hoped to build on the successes of 2021 where the UK made almost 25% of the global seizure total.
- ✎ Consideration is being given to forming an enforcement subgroup to focus on the European eel trade and address the lack of intelligence being submitted in this national priority area.

Case Study

Arron HALSTEAD – Lancashire Police & NWCU – August 2020⁵

HALSTEAD, a taxidermy dealer, was the first person in the UK to be imprisoned twice for offences under the COTES regulations. As reported in the previous Strategic Assessment, HALSTEAD was sentenced to 56 weeks in custody in August 2020. 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.



POCA update: A POCA investigation has now been completed on HALSTEAD. This resulted in a benefit figure of £99,137.32, with a £71,489.40 confiscation order imposed. This was to be paid within 3 months with 14 months imprisonment default. HALSTEAD was also issued with a Serious Crime Prevention Order (SCPO).

⁵ [Wildlife trader jailed for endangered animal sales \[BBC\]](#)

WCCAG Summary:

European eel: Consideration as a standalone PDG to tackle the domestic illegal activities. The conservation status in the UK is different from the global assessment as *'critically endangered'* due to surplus production in the UK. The supply and demand can lead to trafficking and laundering internationally, however the local level conservation status of the species does not seem heavily impacted by that threat. To consider a targeted domestic enforcement response to the threat of illegal elver fishing and increased attention/co-ordination between relevant agencies to improve monitoring, potentially delivered through a new PDG (and/or sub-group of CITES PDG).

Illegal trade in raptors: Although little raptor trade has been detected at UK border in last two years, there is evidence of wild-taken birds (especially peregrines) being laundered into captive breeding operations for export to the Middle East. There are many Middle East-owned breeding facilities within the UK. Also new breeders and dealers joining the raptor market require attention to ensure compliance.

Reptiles: Focus currently is the trade between the UK and EU following the EU-Exit with demand from hobbyists for rare reptile species. There is still a significant illegal trade even with a responsible and largely law-abiding pet market.

Beauty, health & medical products: Beauty products have become an increasingly important issue especially high-end cosmetics containing caviar and sturgeon oil – these are the most seized caviar item by Border Force. There has been a decline in numbers of products containing animal extracts (e.g. big cats). Beauty products added to the health and medicinal products sub-priority.

Timber: Significant intelligence gap of what products are entering the UK - of concern are large sawn wood and log shipments. Agarwood is one of the

most important products dealt with at the border. Timber identification is a major issue of note.

Stony corals: Consideration as an emerging issue. Border Force confirmed corals were seized in large numbers in the UK in 2019 with an observed trend for coral imports via third countries.

Caviar: Consideration as an emerging issue. The illegal trade is of concern due to the critical state of wild sturgeon populations despite efforts to promote sustainable captive breeding. EU seizures indicate products are moved and traded around the continent in large quantities. EU-Exit and new restrictions are likely to impact the illegal trade.

Recommendation: CITES to remain as a UK wildlife crime priority as highlighted as a priority conservation issue by the WCCAG. The main sub categories of CITES include; European eel (*Anguilla anguilla*), illegal trade in raptors, ivory, beauty, health & medicines, timber and reptiles. The illegal trade in taxidermy (including skulls), stony corals, caviar and flora are concerns to monitor.



Credit: L Campbell



Freshwater Pearl Mussel (FWPM) – Conservation Priority

Current Picture – Key Themes

Freshwater pearl mussels (*Margaritifera margaritifera*) are a critically endangered species. A stronghold of colonies exist in Scottish rivers and these populations are of global importance. It is illegal to disturb, injure, take or kill a freshwater pearl mussel (Wildlife and Countryside Act 1981). Freshwater pearl mussels have specific habitat requirements and a complex lifecycle which make them particularly susceptible to habitat degradation and overexploitation. As filter feeders, freshwater pearl mussels are extremely vulnerable to water pollution and engineering work in rivers [**High Confidence**]. Freshwater pearl mussels are further threatened by overexploitation due to illegal pearl fishing [**High Confidence**].

There are only two jewellers in the UK that hold licences to trade freshwater pearls. Only pearls taken from the wild prior to 1991 can be sold under the licence.

Criminal activity involving freshwater pearl mussels is rare. However, individual incidents have a severe impact on the species. Deterrence and detection continue to be difficult, as offences generally occur in remote and inaccessible areas [**High Confidence**]. Prevention is the main focus around this criminality through raising awareness, reporting and proactive policing operations.

A previous investigation conducted by Police Scotland in 2018 indicates that pearl fishing techniques are handed down within families and pearls are likely to be kept for personal collections [**Moderate Confidence**].

Emerging Issues

There have been no new emerging themes or trends identified.

PDG

Due to the low volume of incidents the PDG continue to focus on prevention and conservation.



WCCAG Summary: Freshwater pearl mussels remain a taxon identified as a conservation priority for enforcement action after scoring review. Following droughts in 2021, translocations may become necessary in future and long-term survival depends on availability of host stocks.

Recommendation: Freshwater pearl mussels to remain as a UK wildlife crime priority as the WCCAG have highlighted as a priority conservation issue.



Raptor Persecution – Conservation Priority

Current Picture – Key Themes

Raptor persecution has been a UK wildlife crime priority since 2009. All birds of prey are fully protected under the Wildlife and Countryside Act (1981). Raptor persecution encompasses the killing, taking and injuring of birds and eggs, disturbance, damage and destruction of nests. [RSPB data](#)⁶ indicates 2020 was the worst year on record for raptor persecution in the UK, with North Yorkshire a hotspot for incidents.

The extent of raptor persecution and the offender demographic is well established through:



It has become increasingly evident that the majority of raptor persecution occurs in and around certain habitats and land-use types. Upland areas managed for grouse shooting continue to be a locus for raptor persecution, and other areas managed for gamebird shooting have also seen a share of incidents [**High Confidence**]. The persecution of raptors in these areas is largely indiscriminate and all raptor species are vulnerable to persecution. Shooting and poisoning are the preferred methods of removing birds of prey [**High Confidence**]. Poisoning is indiscriminate and the use of poisoned baits can have a greater impact than what was originally intended. There is evidence that dogs have died following the ingestion of

poison bait material and such baits could also pose a risk to members of the public [**High Confidence**].

The ICCWC Toolkit highlighted progress in Scotland with regards to policy change to prevent raptor persecution and support enforcement action. The introduction of vicarious liability gives enforcement agencies greater jurisdiction to hold landowners and sporting agents to account. Furthermore, changes to the general licence have increased the powers of the licencing authority, NatureScot. NatureScot are able to apply general licence restrictions to those operating on land where it is suspected that wildlife crime has taken place. This is an important development given the challenges associated with meeting evidential thresholds and the low numbers of successful prosecution cases. The Scottish Government has used the findings of the [Werritty Report \(2019\)](#) as a foundation for research-led policy change. NatureScot are currently exploring options for sport shooting licenses, on behalf of the Scottish Government. Currently, Scotland is the only country in the UK to implement such policy changes.

The Rome Strategic Plan for Eradicating Illegal Killing, Taking and Trade in Wild Birds in Europe and the Mediterranean region was officially adopted into the Bern Convention in December 2019⁷. By 2030, member states will strive to achieve a reduction in the scale and scope of the illegal killing, taking and trade by at least 50% within their national territories.

Priority species

The WCCAG identified five priority species, a brief summary is provided below:

Species	Summary
Hen harrier <i>Circus cyaneus</i>	Hen harrier persecution remains a top priority for wildlife crime enforcement. Conservation and enforcement efforts have supported improved breeding success in recent years. However, population levels are still well below expected numbers and any deaths setback

⁶ [Birdcrime 2020](#)

⁷ <https://rm.coe.int/tpvs-2019-03rev-draft-romestrategicplan-ikb-rev-06-12/168099315b>

	species recovery. A diversionary feeding scheme has been established in a bid to prevent hen harriers predating on grouse. Licence conditions must be carefully observed to prevent disturbance to hen harriers at ecologically important sites.
Golden eagle <i>Aquila chrysaetos</i>	Persecution of golden eagles continues to harm population recovery and expansion into suitable habitat.
White-tailed eagle <i>Haliaeetus albicilla</i>	After being persecuted to extinction, white-tailed eagles have successfully been reintroduced into the UK. The re-introduction scheme has been a multi-agency effort with international support. As re-introduction efforts have expanded, so has conflict and persecution.
Peregrine falcon <i>Falco peregrinus</i>	Pigeon fanciers are known to target peregrine falcons to prevent them from predating on racing pigeons. Furthermore, the theft of eggs and chicks from peregrine falcon nests threatens population viability. This type of criminality is covered in detail in the illegal trade in raptors section.
Goshawk <i>Accipiter gentilis</i>	There is more limited intelligence to suggest that wild goshawks are illegally taken from the wild and laundered into the falconry trade. Like other raptor species, goshawks are persecuted due to their predation of game species.

Current Operations

Op EASTER is a long running operation targeting egg collectors and traders. The taking of wild bird eggs is illegal yet it remains the pastime of some determined individuals. Whole clutches of eggs can be taken and rarer species (including raptors) are particularly prized by collectors. The eggs are generally stored in private collections and the collectors are highly secretive of them.

Op OWL is a multi-agency initiative created by the Chair of the Raptor Persecution Priority Delivery Group and the North Yorkshire Police Rural Task Force. It was adopted to increase public awareness of bird of prey persecution and to seek support in tackling crime. Op OWL has not been progressed in 2021/22 due to the absence of a chair for the Raptor Persecution PDG in England & Wales.

Investigations

Raptor persecution incidents typically occur in remote locations and it can be challenging to identify offences. The increased use of satellite tags has improved the detection rate of raptor persecution incidents for some species – notably hen harriers and white-tailed eagles. However, the full scale of raptor persecution is still unfolding and the proportion of raptor persecution incidents which are detected and suitable for investigation are only a small fraction of cases **[High Confidence]**.

A Raptor Persecution Toolkit is in development which will provide guidance and information to investigators. The toolkit will equip investigators with the knowledge they need to investigate raptor persecution effectively and increase the likelihood of successful prosecutions.

Forensic specialists at SASA and those bodies involved in the Wildlife Incident Investigation Scheme (WIIS) continue to offer invaluable expertise in the investigation of raptor persecution. Maximising forensic opportunities is an essential component of raptor persecution investigations, because eyewitness and digital evidence are rare. The acquisition and strategic distribution of wildlife carcass freezers in Scotland has improved the effectiveness of wildlife crime infrastructure. The Raptor Persecution Toolkit will provide investigators with an aide memoire with regards to forensic opportunities and scene management.

PDG

There is currently no appointed chair for the Raptor Persecution PDG in England & Wales. It is essential that a permanent chair is appointed to manage progression of PDG objectives.

Case Study

Invercauld Estate – Police Scotland – NatureScot – March 2021⁸

In March 2021, the carcass of a golden eagle was found on Invercauld Estate, Aberdeenshire. A rabbit and a hare laced with poison bait were found alongside the golden eagle. Forensic analysis confirmed the eagle had been poisoned. No arrests were made despite there being evidence of criminal behaviour. This case study exemplifies a common outcome of raptor persecution incidents, whereby the forensics point to criminality, but there is insufficient evidence to build a case.

Police Scotland's evidence was presented to NatureScot and a decision was made to restrict the use of general licences on a part of the Invercauld Estate for three years. Without a general licence, the landowner is not able to control certain predators (such as carrion crows and magpies) on that part of the estate.



Credit: BBC / RSPB Scotland

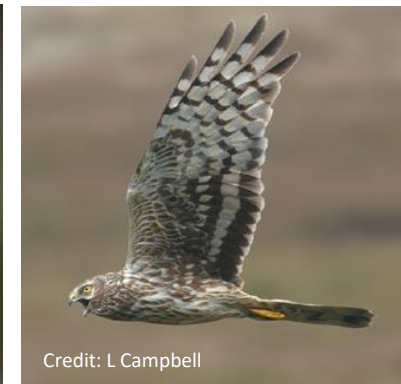
The Scottish Government have adopted a more progressive approach to addressing raptor persecution which enables NatureScot to take action even when there is insufficient evidence to progress a criminal prosecution. There is a greater level of accountability for landowners to ensure raptor populations are protected from abuse.

WCCAG Summary: Goshawk, golden eagle, hen harrier, peregrine falcon and white-tailed eagle (all taxa) to remain as a conservation priority for enforcement action after scoring review. Advantages and disadvantages of tackling raptor persecution by species discussed along with a hotspot focus (i.e. grouse moors) of illegal activity affecting a wide range of species.

Recommendation: Raptor persecution (focus goshawk, golden eagle, hen harrier, peregrine falcon and white-tailed eagle) to remain as a UK wildlife crime priority as the WCCAG have highlighted as a priority conservation issue.



Credit: L Campbell



Credit: L Campbell

⁸ [Estate licence restricted over golden eagle poisoning \[BBC\]](#)



Badger Persecution – Non-Conservation Priority

Current Picture – Key Themes

Badgers are one of the most persecuted mammals in the UK and have been subject to this cruelty for hundreds of years. The main legislation covering badgers is the Protection of Badgers Act 1992 but there are also aspects of other legislation that can be used against those who persecute badgers – including the Wildlife & Countryside Act 1981, Animal Welfare Act 2006, Wild Mammals (Protection) Act 1996 and the Hunting Act 2004.

Analysis of incident data⁹ indicates sett interference is the most prolific type of persecution against badgers. Hunts followed by sett blocking, development and sett digging are the main sub categories of sett interference [**High Confidence**].

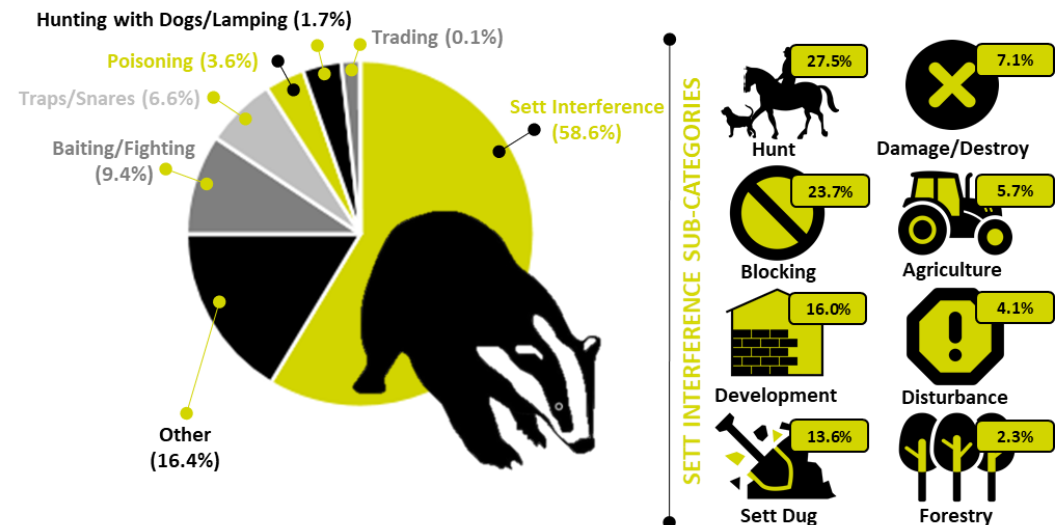
The association to hunts is likely to be an underestimate as other sub-category activities can also be an indicator of fox hunting - where setts are blocked prior to hunts or damaged if dogs chase a fox into a sett and they are dug out.

Other types of persecution directed at badgers remain a significant concern as harm, suffering and death can result. Activities include baiting, fighting, lamping, shooting and hunting with dogs [**High Confidence**]. These activities can be interlinked and are associated to cohorts of men who are violent in nature and commonly have links to other types of criminality; including serious and organised crime and other wildlife crime including poaching and hunting offences. Status dogs used in these activities are bred and sold, and can command high prices [**Moderate Confidence**].

Dogs that interact and come into contact with badgers as part of these activities are almost certain to have facial/muzzle injuries and de-gloving is common. However, as these activities are illegal there is only a remote

chance that dogs will receive veterinary treatment with owners providing their own medical assistance [**High Confidence**]. Responding to the welfare concerns of dogs by seizing them protects the dogs from further harm, but also disrupts offenders' ability to persecute badgers in the immediate future.

TYPES OF BADGER PERSECUTION



There are many indicators suggesting individuals are involved in badger persecution, from the possession of a spade (used to dig sett) to more technical equipment (trackers) with collars placed on dogs underground location when entering a sett [**High Confidence**]. One incident of note concerned dogs forced into a sett in order to drive a badger out - a metal chin guard had been attached to the dog in order to minimise facial injury and locator collars and tracking devices were located at the scene. One dog

⁹ NWCUC Badger Incident Analysis 2016-2020 – England & Wales

had to be euthanised due to injuries received and the offender was banned from keeping animals for life¹⁰.

In certain circumstances badgers are deemed vermin and are killed in order to remove them from a particular location, such as on agricultural land by farmers/gamekeepers. This can involve poisoning, gassing or the use of traps and snares. The use of poisons and gases have potential risk to health or life and these incidents should be reported into the Wildlife Incident Investigation Scheme (WIIS). Some items i.e. Cymag have been banned in the UK, but are still used and may be illegally stored. Traps may also be used to catch badgers for baiting purposes.

Investigations can be complex and it is important an expert in badger ecology is consulted at the earliest opportunity. Thorough data collection from initial scene visits are vital to secure evidence i.e. video (body worn camera) and photographs. The badger toolkit (launched in October 2020) provides guidance and information for investigations such as managing crime scenes, forensic and search opportunities. Acquiring this information will aid investigations and provide the greatest opportunity to achieve a successful result. Evidence such as hair, soil or DNA samples can be used to later match to other samples linked to offenders. The toolkit can be accessed from the [Knowledge Hub](#) Wildlife Crime Group or from the NWCU, however a smartphone App for WCOs to access toolkits etc. would aid and assist officers in live time when dealing with wildlife crime incidents.



Credit: L Campbell

Emerging Issues

There has been a significant increase (+221%) in sett interference incidents related to developments between 2019 and 2020 [**High Confidence**]. It is unclear as to why there is such a large increase, incidents refer to a wide range of activities and are associated to individuals, farmers, construction industry and councils in addition to work on the HS2 route. The type of sett disturbance is also varied and includes blocking setts with earth and/or wire to the complete destruction of the sett. Development related sett interference is likely to remain a significant issue and concern due to the continuous development plans across the UK to build more homes, infrastructure improvements and other construction plans. This land development will result in increased likelihood of conflict with badger habitats in the future.

¹⁰ [Robert KING Badger Baiter \[thescottishsun.co.uk\]](#), [Man banned from keeping animals for life \[Daily Record\]](#), [Badger baiter banned from keeping animals \[BBC News\]](#)

PDG

- 🦅 Campaign to raise awareness and tackle the increase in sett interference incidents working with the Association of Local Government Ecologists (ALGE).
- 🦅 NWCU annual analysis of incident data. Disseminated to PDG in order to focus resources.
- 🦅 Improve consistency for badger investigations, including the use of expert witnesses.
- 🦅 Badger Trust campaign to raise sentencing guidelines for badger persecution.

Recommendation: Badger Persecution to remain as a UK wildlife crime priority due to the high MoRiLE risk and ORI scores.

Case Study

**Grant LEIGH Jnr, Grant LEIGH Snr & Paris CARDING
Cheshire Police & RSPCA – March 2022 Sentenced¹¹**

Police alerted to a Facebook group showing graphic evidence of illegal fox hunting, badger baiting and other wildlife crimes with the use of dogs as part of a 'family day out'. Footage showed children (two years old) present who were encouraged to inflict and injure wild animals. Warrants were conducted leading to arrests. Seizure of phones uncovered video and photographic evidence consistent with hunting activity and cruelty. LEIGH Jnr had been exposed to violence and hunting (LEIGH Snr was a previous huntsman) from a young age. The case showed how this behaviour is learnt and then perpetuated to younger generations.



Animal welfare issues were identified due to the poor conditions the dogs were kept in and they exhibited historic injuries on faces - indicating use in baiting/fighting. There were also indications in involvement in other wildlife crime i.e. hunting deer.

Result: Seven dogs seized (terrier and lurcher types). All offenders banned from keeping dogs for life. CARDING - 22 weeks custody suspended for 12 months and £1,000 costs. LEIGH Snr - 12 weeks suspended for 12 months and £1,000 costs. LEIGH Jnr - 26 week sentence added to a prison sentence for different matters.

¹¹ [2 year old encouraged to kill wildlife on day out \[The Independent\]](#), [Graphic and perverse cruelty at its worst \[Manchester Evening News\]](#)



Poaching & Hare Coursing – Non-Conservation Priority

Current Picture – Key Themes

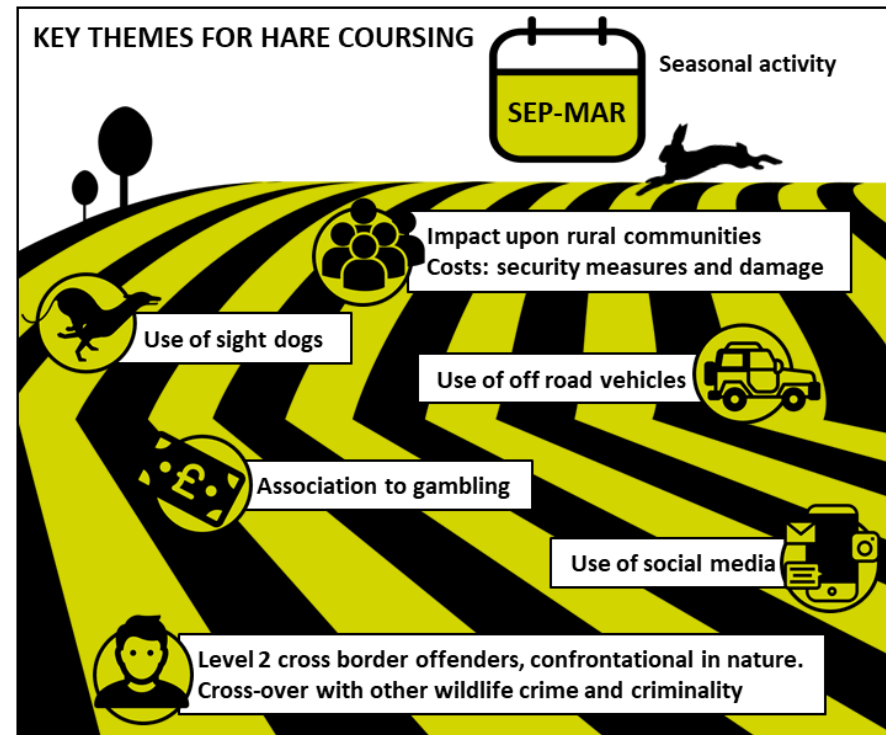
Poaching (fish and deer) and hare coursing are volume wildlife crime issues impacting the UK **[Moderate Confidence]**.

Hare Coursing is a serious seasonal activity (peak September-March) of concern for rural communities as it can cause significant physical, psychological and/or financial impact for farmers and landowners.



Confrontational and threatening behaviour of offenders, occurring repeatedly and continuously over a long time period can result in victims living in fear of violence, reprisals and repercussions if they report to police **[High Confidence]**. Of note are several incidents where children/youths have been present and therefore exposed to violent wildlife criminality, this exposure is likely to lead them to be future offenders.

Additional security measures implemented (i.e. gates, padlocks, bunds) by farmers/landowners result in a financial cost and loss of working time. Criminal damage to security features and crops occur when coursers/poachers trespass onto land (some of which is protected i.e. SSSI) in pursuit of wildlife **[High Confidence]**.



Individuals linked to hare coursing and poaching are commonly associated to other types of criminality including other wildlife crime **[High Confidence]**. Many coursers are Level 2 cross border offenders and it is likely they will travel hundreds of miles from their home address to course, indicating a planned and organised element to offending **[High Confidence]**. The activity is also associated to illicit finances with gains made by betting on outcomes. Details of finances is limited, but a winning pot on average is worth £2,000 with funds transferred electronically **[Low Confidence]**.



Poaching occurs throughout the year with a seasonal peak around Christmas for venison and salmon. There are potential public health risks if unregulated poached meat enters the food chain and is processed below basic hygiene standards. The extent of this activity and risk to the public is unclear and not fully understood **[Low Confidence]**. Financial gain through selling poached meat is made through sale to friends/family, but intelligence also indicates it is sold/supplied locally in shops, butchers, hotels, and pubs or for dog food **[Moderate Confidence]**. There is a cohort of offenders who hunt only for fun or thrill as a social/sporting activity.

Poaching is highly likely to impact wildlife, especially if occurring frequently and intensively in specific areas, locations and/or habitats or at certain times (i.e. close season). Poaching can alter the behaviour and structure of a herd, affect breeding and movement patterns especially if the wrong animal is targeted or raise animal welfare concerns of unnecessary suffering; i.e. mother deer killed that has dependant young, wounded deer left to die or undersized fish taken. Illegal poaching will also impact upon the management strategy of the herd or fish stocks **[Moderate Confidence]**. Police Scotland reported a 282% increase in fish poaching during 2020, with the pandemic being a contributory factor¹². Salmon and sea trout catches are at record lows with poaching a contributing factor affecting the future sustainability of these species. Course, sea and game fish poaching all differ in the type and modus operandi of offending.



¹² [Operation Wingspan Fish Poaching \[fms.scot\]](#)

¹³ [Dogs used to kill animals shared on TikTok \[Lancashire Telegraph\]](#), [Burnley trio Dog attacks on TikTok \[BBC News\]](#)

Emerging Issues

There are many groups of young men hunting wildlife with their own dogs in small packs. Some are specifically targeting certain species while others will target any wildlife including pets. They will poach and course to kill deer, badger, foxes, hares, rabbits etc. mainly for fun/thrill but also for status and bragging rights. Many record incidents on their phones and post on social media **[Moderate Confidence]**.



Case Study

**Ryan HANCOCK, Marcus LEVERETT and 16 year old male
Lancashire – February 2022¹³**

Two young men and a youth were involved in cruel acts, hunting and unnecessary suffering. Target animals included domestic cats, rabbits, deer, birds and badgers. They targeted animals on a council estate and nearby wildlife. A witness filmed them encouraging dogs to attack a cat. Lancashire Police executed warrants and mobile phones were seized. When examined they identified HANCOCKS lurcher dogs in 182 images and videos used to attack animals. Some video footage was edited, set to music and uploaded to TikTok.

Result: HANCOCK - 18 weeks prison sentence. LEVERETT - 12 weeks suspended for 18 months, 20 days rehabilitation activity requirement, £1k costs and £128 surcharge. The 16 year old male - 12 month referral order. All banned from keeping animals for 10 years.

PDG

- 🦅 The wider use of the DISC System¹⁴ to allow real-time information sharing for rural and wildlife crime issues including hare coursing.
- 🦅 New legislation introduces tougher sentencing and improved police powers to tackle hare coursing,¹⁵ with the aim to be effective from the start of the 2022-2023 season (August 2022).

¹⁴ System (app and website) that enables local crime reduction partnerships self-manage low level crime and ASB. [The Disc System](#)

¹⁵ [Hare Coursing Legislation \[www.gov.uk\]](#), Amendments to the Police, crime, Sentencing & Courts Bill

- ✔ National approach to targeting prolific and cross border hare coursing/poaching nominals with an aim to prevent further offending and enforcement opportunities for those in breach.
- ✔ Improved working with CPS to raise standard of prosecution files and to create best practice guides.

Recommendation: Poaching and hare coursing to remain as a UK wildlife crime priority due to the high MoRiLE risk and ORI scores.



Cyber Enabled Wildlife Crime – Thematic Priority

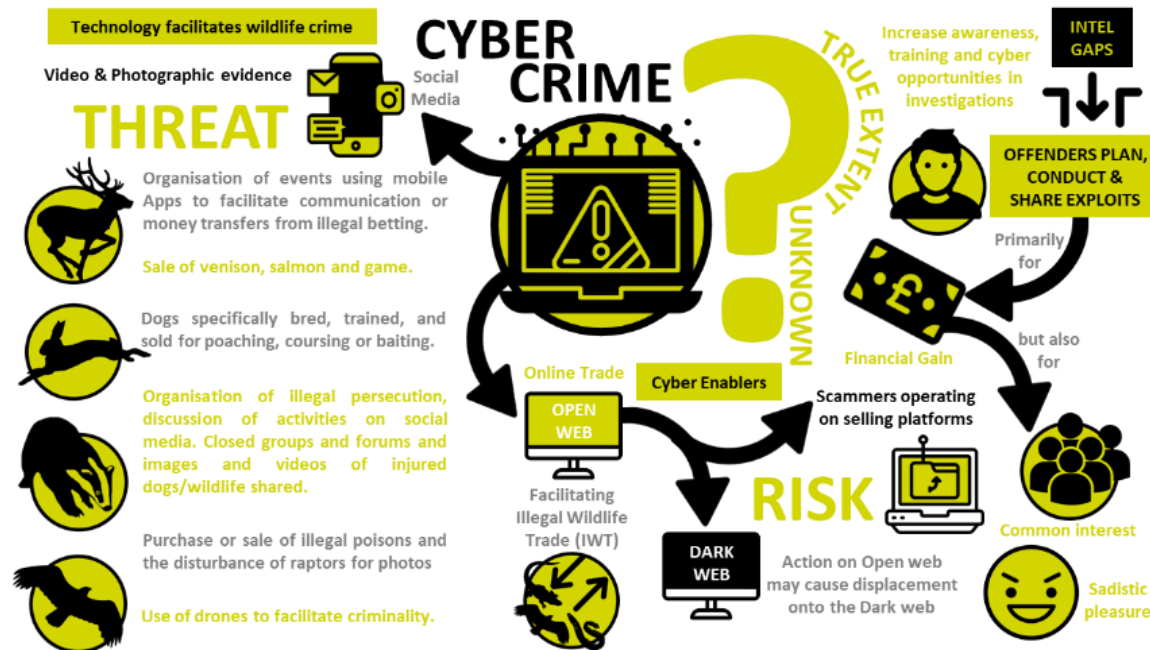
Current Picture – Key Themes

Cyber-crime is an **'umbrella'** term for lots of different types of crimes which either take place online or where technology is a means and/or target for the attack. It is one of the fastest growing criminal activities across the world, and can affect both individuals and businesses.

It enables offenders to both facilitate and engage in criminality.

The NWCU contextualise wildlife crime across key thematic threat areas – focusing on the ways in which wildlife crime is perpetrated, rather than limiting it on a species basis. As a result, in 2018, cyber enabled wildlife crime became one of the areas of priority focus within the UK.

Cyber enabled wildlife crime ultimately allows criminality to continue or hinders the effective investigation or prosecution of offenders. The use of the internet as an enabler in the facilitation of wildlife crime is manifest throughout many types of wildlife crime – from the on-line trade in illegal egg collections to the organisation of hare coursing competitions to the trade in endangered species.



The vast majority of illegal wildlife trade investigations that the NWCU 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.

The true extent of the trade of CITES and protected species via the internet continues to be largely unknown, however it does continue to be highlighted as a clear substantial risk. Intelligence has consistently

identified links between illegal wildlife trade and online selling platforms. Challenges arise when examining advertisements and images for sale on internet sites, as there may not always be sufficient details/evidence to confirm whether they are in fact CITES-listed or protected.

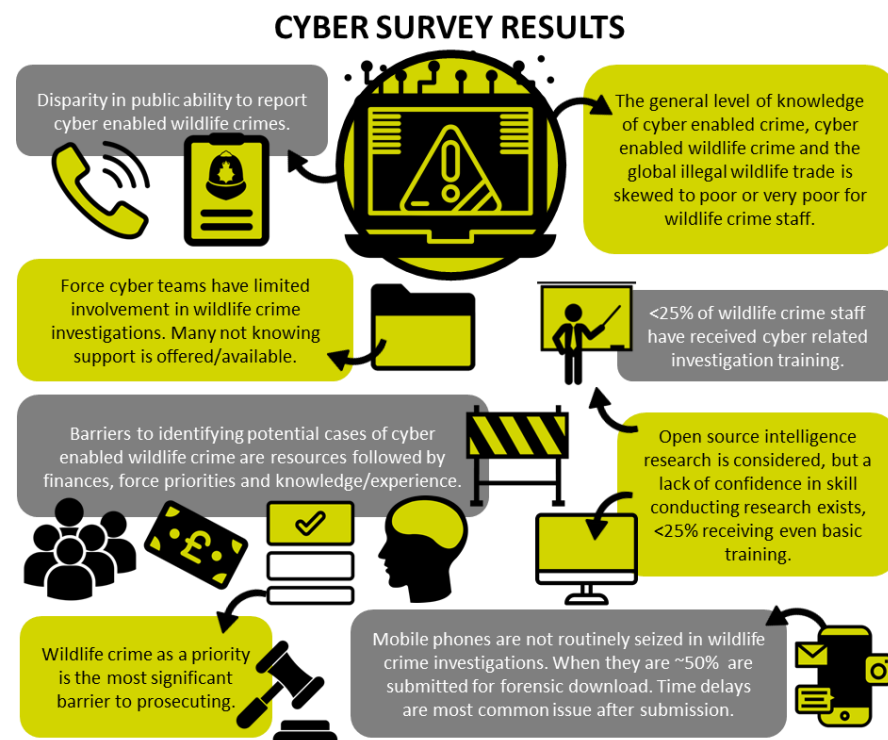
The ICCWC Toolkit outlines a number of recommendations to assist with combating cyber enabled wildlife crime.

Emerging Issues

It is anticipated that cyber enabled crime will continue in line with the growth of technology. In essence this crime type allows criminality to continue or hinders the effective investigation or prosecution of offenders. However, it is acknowledged that proactive investigations of cyber enabled offences are likely to cause displacement, with the potential for offenders moving to the dark web.

PDG

The cyber enabled wildlife crime PDG is made up of representatives from government, law enforcement agencies, non-government organisations and civil society organisations, all working together to target cyber enabled wildlife crime. Geographical remit is primarily UK, but assistance may be provided internationally, if deemed appropriate. The following highlights some of the main findings from the Cyber PDG Survey.



Recommendation: Cyber enabled wildlife crime to remain as a UK wildlife crime priority due to the cross-cutting nature of this thematic area. Most wildlife crime priorities have a cyber element to offending and opportunities exist to identify and target offenders and reduce harm.

Cross-Cutting Themes



Serious & Organised Crime (SOC)¹⁶

The cost of SOC to the UK economy is estimated to be £37billion annually and is a national security threat **[High Confidence]**. SOC is becoming an increasingly key threat within the UK but also globally. Two significant influencing factors have been the global Covid-19 pandemic and the UK's exit from the EU **[High Confidence]**. SOC offenders have continued to pursue activities, adapting to the changing situations and exploiting any new opportunities that arise. The exact contribution of wildlife crime to the SOC estimate is unknown and would be difficult to estimate. However, wildlife crime continued throughout these changes indicating these external factors had no impact upon offending or offenders were able to adapt and alter their modus operandi **[Moderate Confidence]**. The association between wildlife crime and SOC is overlooked and under prosecuted - due to evidential difficulties and the associated legislation. This has resulted in the continuing exploitation of wildlife - the activity is perceived as low risk, high reward.



PROSPERITY



VULNERABILITY



COMMODITY

SOC is broken down into three strands; Prosperity, Vulnerability and Commodity. Some examples of where SOC has a specific link to current wildlife crime priority areas are outlined for context:

¹⁶ [SOC \[crimestoppers-uk.org\]](https://www.nca.gov.uk/nca-national-strategic-assessment-2021), [NCA National Strategic Assessment 2021 - \[nationalcrimeagency.gov.uk\]](https://www.nca.gov.uk/nca-national-strategic-assessment-2021)

Prosperity: Laundering money from illicit finances generated from wildlife crime can include the sale and export of European eels, or betting related to badger baiting/hare coursing. Fraud offences can be committed when fake/false declarations are made on wildlife permits. Blurring the lines between legitimate activity and criminal activity occurs in order to mask wildlife crime; such as wild caught raptors recorded as captive bred, or illegal shellfish catches mixed with legitimate ones or recorded incorrectly on documentation.

Vulnerability: Few wildlife crimes have a human related SOC vulnerability factor as flora and fauna are the focus of the criminality/persecution. However, Modern Slavery & Human Trafficking concerns have previously been associated to cockle pickers due to the organised criminal element associated to this activity and the exploitation of vulnerable persons.

Commodities: The Illegal Wildlife Trade (IWT) covers items listed under CITES concerning flora and fauna traded globally. Most listed items originate from outside the UK e.g. ivory, skulls, reptiles etc. However, there is great concern regarding the trade of some UK sourced commodities including the glass eel trade with China/Asia and the raptor trade to the Middle East **[High Confidence]**.

Due to societal change, a greater proportion of peoples' daily lives are now conducted online. This is also the case for



SOC and as such criminality is becoming an increasing global threat **[High Confidence]**. Certain wildlife crimes have a cyber element or technology is used by criminals to facilitate criminality. This could include live streaming a hare coursing event or the use of drones to locate raptor nests **[High Confidence]**.

The 2022 NWCU Illegal Wildlife Trade (IWT) report will focus on the international trade in UK species. It will identify and recommend that illicit finances should be pursued in order to tackle and disrupt organised wildlife criminality.



Illicit Finances

As previously highlighted the illegal wildlife trade is estimated at £17billion and this is highly likely to only be the tip of the iceberg as a large proportion goes unreported and unrecorded **[High Confidence]**. The highly organised criminal trade can be very lucrative and can be viewed as lower risk compared to movement of other commodities (people, drugs and firearms) where penalties are more severe. There are opportunities for law enforcement to identify and target those laundering criminal proceeds through the financial system. Individuals and cohorts targeting/persecuting wildlife do



so for financial gain in other ways such as betting on outcomes of badger baiting or hare coursing. It is near impossible to ascertain the financial value of this activity as funds are lower and are not always processed through the financial industry.

Where activity and laundering of proceeds of crime occurs then resources should be focused on those that have greatest impact and where the use of a financial investigator (FI) can be utilised to identify, freeze and seize the illicit finances associated to wildlife crime. The current capacity and capability across the UK to investigate and target those involved in illicit finances is limited as FI resources are not routinely allocated to wildlife crime investigations. The allocation of specialists including detectives and FIs aims to improve the response to tackling wildlife crime and to disrupt offenders. The use of the proceeds of crime act (POCA) against offenders can be used effectively to recover finances from individuals who have profited from wildlife crime. As shown by Ngie LAW in the following case study, but also in the case against [Arron HALSTEAD](#) **[High Confidence]**.

Case Study¹⁷

Ngie LAW – Derbyshire Police – August 2021

LAW was convicted in August 2021 of 18 different counts related to the buying, selling and possession of ivory goods to the value of approximately £65,000. Investigation led by Derbyshire Rural Crime Team - supported by the NWCU and Border Force - resulted in a two year sentence suspended for two years. In March 2022, LAW was subject to a significant confiscation order under the Proceeds of Crime Act (POCA), totalling £61,266.97.

¹⁷ [POCA Seizure for Ivory trader \[Derbyshire Times\]](#)

Non-Priority Issues of Concern

The following issues are of concern, but have not been highlighted as areas to be raised as a priority (either through the WCCAG or MoRiLE scoring process). A summary of each thematic area is provided for context. Some of these thematic areas already have operational activity or working groups set up to focus on and tackle specific issues. **Where these have been established, it is recommended they continue in order to enhance the intelligence picture and continue the progress made in tackling the wildlife crime issues of concern.**



Egg Collection

Egg collecting has seen a significant decline in popularity over many years and those still collecting are low in number. Offenders tend to fit a certain cohort (commonly older men) and their activity is obsessive in nature and a 'lifestyle' choice with a desire to own eggs and trade collections [**High Confidence**]. Historically this was a popular activity, but has died out in part due to changes in legislation and the wider public understanding of how egg collecting impacts upon wildlife. Egg collecting can have significant impact upon certain birds, especially if rare species (including raptors) are targeted and whole clutches taken. This will harm the wild bird population. However, targeting of endangered species is less common and most targeted species now are not of conservation concern [**High Confidence**].

Although the collection of eggs is seasonal in nature, the trade and sale (commonly online) of eggs can occur anytime throughout the year.

Egg collection to remain as an issue of concern to monitor, but not raised as a priority due to low MoRiLE risk and ORI scores. Operation EASTER is an annual operation focused on this issue. It raises awareness of offenders of note and the priority areas impacted by egg collection across the UK.

Finch Trapping

The current picture surrounding finch trapping has changed since the last strategic assessment. A perceived reduction in intelligence suggest this activity is occurring less frequently [**Low Confidence**]. The target species now are more likely to be common, rather than rare species/those of conservation concern. Where incidents are reported, the RSPCA have sufficient capacity and capability to respond and investigate.

Finch trapping to remain as an issue of concern to monitor, but not raised as a priority due to low MoRiLE risk and ORI scores.

Hunting with Hounds (HwH)

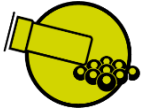
This is an activity strongly associated with fox hunting and use of pack hounds. Hunting is a highly political and polarised issue that affects and impacts rural communities in many and varied ways. Hunting activity is showing a return to pre pandemic levels after significantly low levels during lockdown. The National Trust banned all hunting on its land in November 2021, however multiple reports of hunting on National Trust land has occurred since the ban [**High Confidence**].

Many hunts are currently being investigated for various wildlife crimes even since the introduction of the Hunting Act in 2004, many with repeated accidental kills [**High Confidence**].

Due to the concern and organisational risk, a working group was set up to tackle the issue in January 2022. The focus of the group is to ensure national consistency in the investigative response and improve engagement with hunts and sabs. The group is also developing a toolkit that includes guidance documents similar to those developed by PDGs.

Hunting with Hounds to remain as a Working Group developing and progressing the aims of the sub groups (Enforcement and Engagement) to establish improved national consistency. Although Hunting with Hounds scores very high for ORI the risk score is lower than the established priority areas.





Illegal use of Lead Shot

A working group met in February 2021 to examine the issues concerning use of lead shot. The use is shown to have a negative impact on the favourable conservation status of waterbirds across the UK, but also has an environmental and human impact. Lead shot has been identified as the primary cause of lead pollution for waterbirds, but also poses a secondary risk of poisoning to humans (i.e. ducks illegally shot with lead ammunition) **[High Confidence]**. Restrictions of the use of lead shot are in place across the UK, however the use is believed to be widespread and increasing. Enforcement of restrictions is currently limited and challenges exist in tackling this issue under current legislation. There is also a need for education to support enforcement to improve compliance, progressed under the banner of a national operation. Defra are also exploring options to restrict the use of lead shot.

Lead Shot to remain as an issue of concern to monitor, with a need for enforcement and compliance/education focus potentially as a national operation.

Marine Disturbance

There has been increased concern for wildlife within marine environments across the UK with specific locations identified as focal points due to increased disturbance. This has been especially of note since the Covid-19 pandemic, where restrictions on travel led to increased staycations. Coastal/marine locations are popular for leisure and tourism activities and draw people to enjoy the natural environment and wildlife (ecotourism). This has resulted in increased interactions between people and wildlife; some of which is intentional and criminal, but some is reckless or unintentional. This may be due to lack of awareness and/or



consideration of the impact of individuals' actions and behaviour **[High Confidence]**.

There are financial and ethical reasons for protecting marine locations; for leisure and tourism, but also for the protection of wildlife and conservation. Anthropogenic interactions between humans and marine fauna (primarily cetaceans and seals) can alter species behaviour such as breeding patterns and range **[Moderate Confidence]**. This could result in the loss of species in a certain area or decline in population. Where negative interaction is likely then suitable guidelines can be applied for behavioural changes i.e. considerate use of jet skis near to seals.

Operation SEABIRD, a multi-agency plan, was set up to tackle issues within the Humberside area; the main focus is on engagement, education, explaining and enforcement (only where appropriate) – a 4E approach. The draw to these locations alongside the growth in marine ecotourism is likely to continue in the future placing the UK's marine environments and wildlife at even greater risk of disturbance. Each marine ecosystem across the UK will have specific factors that are unique to their location; such as the environment itself and the habitats that support the marine fauna. Tackling disturbance issues in each area would need to be bespoke, but can draw from what works under Op SEABIRD.

Marine disturbance to remain an issue of concern to monitor, but not raised as a priority due to low MoRiLE risk and ORI scores. Op SEABIRD to be adopted by NWCU as an annual operation to increase awareness and improve the intelligence picture of marine disturbances across the UK. Issues to be tackled locally where marine disturbance occurs with the application of suitable tactics from Op SEABIRD. The WCCAG and PAW Marine Working Group to gather more evidence on the conservation impact of disturbance on marine mammals.



Non-Native Species (NNS)

NNS can have significant environmental impacts within a localised area, including upon native species. While most are harmless, approx. 10-15% can spread and become invasive - impacting upon the environment and affecting the economy¹⁸. Those with the potential to cause significant and widespread impact can disrupt food production e.g. Asian hornet preying on bees and other pollinating insects. This impact however is related to the spread after accidental introduction in Europe and the potential future risks rather than as a result of criminal activity. These concerns are monitored by other agencies i.e. [Non-Native Species Secretariat \(NNSS\)](#).

The response in relation to criminal aspect of NNS introduction is hard to ascertain or quantify as there are various considerations and factors that need to be taken into account. It can include the introduction of a NNS from one area to another within the UK leading to adverse effects such as foraging e.g. Muntjac deer. Muntjac populations are now widespread in the UK and increasing in number and range. However, other NNS introductions result in more significant impact on the environment, ecology and other species. For example signal crayfish predate on native white tailed crayfish, but they also carry disease leading to the native species localised eradication.

There is an increased focus on this issue within Defra with the impact caused by NNS being species specific. This has led to the Invasive Alien Species Order¹⁹ that lists 14 species requiring management. The current reporting levels of criminal activity associated to NNS is low. In addition, there is an intelligence gap between what we know and what is reported. Therefore, there is a potential future risk and need for police to be able to respond to any increase in reporting criminal activity associated to NNS. This may also lead to increased scrutiny on police **[Moderate Confidence]**.

NNS to remain an issue of concern, but not raised as a priority. Although the risk score is high this is mainly due to the environmental and financial impacts caused by invasive NNS. The associated criminal impact is difficult to evidence and low in volume. The ORI score is low as the UK has the capability and capacity to deal with current reporting levels and responsibility of monitoring NNS sits with appropriate agencies. A Working Group to raise awareness, develop training packages and toolkits would assist in preparation for a future raise in reporting.

¹⁸ www.nonnativespecies.org

¹⁹ [Invasive Species Order 2019 \[GOV.UK\]](#)

Glossary

Acronym	Definition
APHA	Animal & Plant Health Agency
BCT	Bat Conservation Trust
CEMA	Customs and Excise Management Act
CITES	Convention on International Trade in Endangered Species
COTES	Control of Trade in Endangered Species
CPN	Community Protection Notice
CPW	Community Protection Warning
Defra	Department for Environment, Food & Rural Affairs
DICE	Durrell Institute of Conservation & Ecology
DC	Detective Constable
DS	Detective Sergeant
EA	Environment Agency
EU	European Union
FAF	Forensic Analysis Fund
FI	Financial Investigator
FWPM	Fresh Water Pearl Mussel
HwH	Hunting with Hounds
ICCWC	International Consortium on Combating Wildlife Crime
IWT	Illegal Wildlife Trade
JNCC	Joint Nature Conservation Committee
MoRiLE	Management of Risk in Law Enforcement
MOU	Memorandum of Understanding

Acronym	Definition
NGO	Non-Governmental Organisation
NNS	Non-Native Species
NNSS	Non-Native Species Secretariat
NPCC	National Police Chiefs Council
NWCU	National Wildlife Crime Unit
ORI	Organisational Risk Indicator
PAW	Partnership for Action Against Wildlife Crime
PDG	Priority Delivery Group
PND	Police National Database
POCA	Proceeds of Crime Act
PPE	Personal Protective Equipment
REG	Regional Enforcement Group
ROSIE	Researching Open Source, Internet and Email
SGARs	Second generation anti-coagulant rodenticides
SCPO	Serious Crime Prevention Order
SOC	Serious & Organised Crime
SSSI	Sites of Special Scientific Interest
UKTCG	UK Tasking Co-ordination Group
UNODC	United Nations Office on Drugs and Crime
WCCAG	Wildlife Crime Conservation Advisory Group
WCO	Wildlife Crime Officer
WID	Wildlife Intelligence Database
ZSL	Zoological Society London

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