

# Bat Crime Tactical Delivery Group

NEWSLETTER



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## Bat Crime Tactical Delivery Group (BCTDG) Chairman



Nationally, the police investigation of bat and other wildlife crime continues to face challenges.

I have reported previously on the removal of experienced staff from rural crime teams and wildlife crime units, reducing investigative effectiveness, and now we await outcomes on reforms to the UK's planning system.

Unfortunately, negative rhetoric around protected species in particular bats, perceived to hold up the delivery of new homes and infrastructure projects, is not ideal when failures to follow planning processes during development and refurbishment work is the main causation factor in the commission of offences.

It is clear that 2025 planning reform will focus on streamlining processes, increasing housing and development, whilst promoting economic growth.

However, it must follow current legislation whilst maintaining or improving the conservation status of the species and their habitats across all counties in the UK.

We are monitoring police incident numbers carefully, for any changes.

### Bat Fact

- British bat species in general cannot generate enough lift to take off from the ground. If one of these species lands on the floor they need to climb up a structure such as a tree, and drop off it, using gravity to gain speed and transition into flight.



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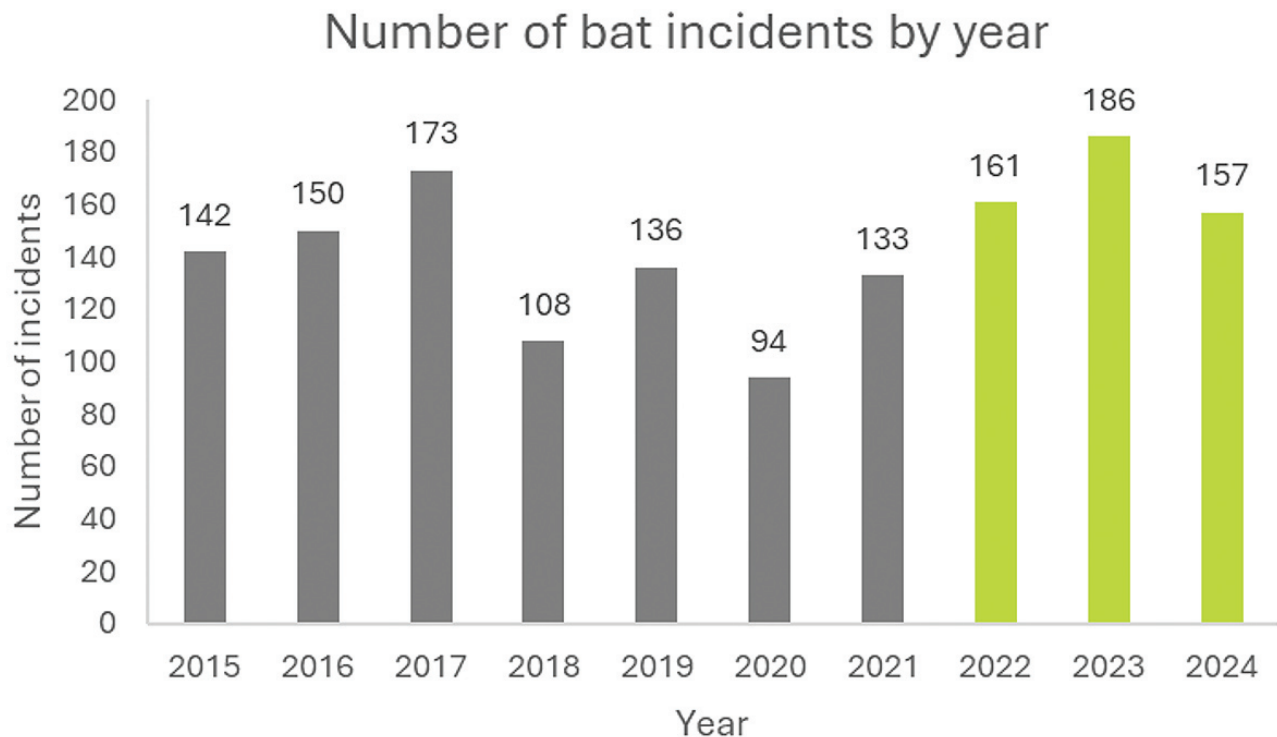
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## 2024 figures on bat incident reports to police



The Bat Crime Tactical Delivery Group (BCTDG) can confirm there were 157 incidents reported to the Police in 2024 relating to bats, a decrease of some 8% in bat incident reporting in comparison to 2023 data.

This figure only gives a flavour on the extent of police incidents recorded against bats and their breeding sites, as not all UK police services provided their numbers.

This data does not consider *Breach of Licence* incidents recorded by our Statutory Nature Conservation bodies.

The BCTDG is continuing its work on the accurate capture and recording of police incident data for 2025. With planning and legislative reform taking place this year it is critical we have accurate figures to complete comparative analysis for 2026/27 on any impacts such changes will have on the reporting and investigation of bat crime.

Investigative outcomes for 2024 are still coming into the BCTDG but at the time of writing there were 7 Community Resolutions (out of court disposals), 1 Police verbal warning, 2 Police conditional cautions, 1 conviction, 1 statute barred (run out of time) whilst three cases are pending CPS/Court decisions.

Currently wildlife crime is not recordable/notifiable, if it was, this would allow the Police and Government to know the true extent and impacts crime is having on our UK species and habitats. Allowing already established resources to focus in on these areas of work more effectively, in an environment of competing demands.

\*Graph courtesy of NWCUC; Green bars represent combined BCT/NWCUC data.



## Fruit bats and CITES



*Black flying foxes*

© Charley Bird

The Wildlife Crime Project (WCP) at the Bat Conservation Trust has noted an increase in concerns over possession of fruit bats here in the UK.

One such report indicated concern for the welfare of an animal being held in an inappropriate cage.

Whilst possession of a UK species of wild bat whether alive or dead is an offence (with some exemptions), fruit bats are native to tropical and subtropical regions of Africa, Eurasia, Australia, and many Pacific Islands and fall outside of such legislation.

Despite this, several species in the genus *Pteropus* (flying foxes) are listed under the Convention on International Trade in Endangered Species (CITES).

The purpose of CITES is to regulate international trade and protect species from over-exploitation, with many included in Appendix I and or II of particular concern, and therefore of interest to enforcement and regulatory services.

Appendix I lists species that are the most endangered, such as the Mariana fruit bat.

Trade in CITES-listed species requires permits or certificates to ensure the animal is legal, traceable, and the trade therefore sustainable.

Investigations into such matters can involve Local Planning Authorities, the Police, and species specialists such as an Animal and Plant Health Agency (APHA) Wildlife Inspector.

In law there is a requirement for a person in possession of a CITES listed species to provide proof of lawful import or acquisition.

All species under Appendix I will require an article ten certificate (A10) for commercial activity (Sale, etc), those under Appendix II may require proof of legal import or acquisition (bred within the UK) but not an A10.

Persons in possession of a fruit bat in the UK subject of investigation will be asked to provide such documentation, which may also include purchase receipt, address of seller/breeder, species ID as well as any veterinarian treatments.

## Fruit bats and CITES – continued

Like many animals, bats can carry human transferable viruses.

Failure to provide such documentation may require authorities to have the animal identified as to whether it is listed under Appendix I to ensure the animal was not part of an illegal trade.

The animal's housing will also be inspected to assess suitability for the species.

Housing and upkeep of a captive fruit bat will cost more than the animal itself each year!

Whilst possessing certain species of fruit bat in the UK may not be an offence, there are other offences that will be considered, including animal welfare offences such as unnecessary suffering, basically failing to meet one or all of the five freedoms:

1. Freedom from hunger and thirst: access to fresh water and a diet to maintain full health and vigour.
2. Freedom from discomfort: providing an appropriate environment including shelter and a comfortable resting area.
3. Freedom from pain, injury or disease: prevention through rapid diagnosis and treatment.
4. Freedom to express normal behaviour: providing sufficient space, proper facilities, and company of the animal's own kind when appropriate.
5. Freedom from fear and distress: ensuring conditions and treatment which avoid mental suffering.

Failure to evidence lawful possession and failure to meet an animal's needs, will result in potential prosecution and seizure of the animal.

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## Environmental damage regulations police template launched



The purpose of the Environmental Damage Regulations (EDR) is to legally compel individuals or businesses responsible for causing environmental damage, to actively remediate any harm done.

They apply where damage to land, water or biodiversity is extremely severe; in the case of biodiversity, damage must be severe enough to prevent certain 'protected species' such as bats and their 'natural habitats' from achieving or maintaining their UK favourable conservation status or adversely affect the integrity of a Site of Special Scientific Interest (SSSI).

This is a little-known piece of legislation, which can be used in parallel with an investigation under other laws such as the Conservation of Habitats and Species Regulations 2017, into the loss of a breeding site or resting place.

This is particularly useful for the police; as a result, working with the Statutory Nature Conservation Bodies (SNCBs) Natural England, Natural Resources Wales, and NatureScot the WCP and members of the Bat Crime TDG developed a police template for reporting such offences to an SNCB. These bodies are responsible for establishing if the conservation status of a site or species has been impacted, and will decide on necessary measures in response.

The consequences of non-compliance with such measures could allow an SNCB to issue Stop notices, warnings, requirements to remediate and/or action a prosecution.

For all, the emphasis should be on proactively reporting, and then for those responsible, putting in place appropriate prevention measures, so that imminent threats and damage do not arise, fundamentally that is the purpose of the Environmental Damage Regulations.

The police pilot will run for one year, with the objective of producing a final template suitable for all police services, agencies and NGOs with an interest in conservation of species and habitats.



## Retirement of DC Sarah Bailey from the Metropolitan Police Wildlife Crime Unit



DC Sarah Bailey retired after 28 years' service in the Metropolitan Police, twelve of which she spent as a detective constable in the MPS Wildlife Crime Unit.

During this time, Sarah investigated numerous wildlife crimes, many of which have resulted in convictions, her last involved the destruction of a badger sett at Wimbledon in which the defendant pleaded guilty and was fined £1,650.

DC Bailey had also assisted colleagues with many wildlife crime investigations, including the destruction of a bat roost during a high-end refurbishment to an apartment. The defendant pleaded guilty and received a fine of £10,249.

Those who met Sarah knew she always went above and beyond to tackle wildlife crime. Her knowledge, experience and achievements have been invaluable, and she will be greatly missed.

The image shows DC Bailey receiving a Bat Conservation Trust *Certificate of thanks* and a Bat Crime Priority Delivery Group challenge coin.

## Retirement of Carol Cotterill (BEM) Rural Crime Co-ordinator Warwickshire Police

Carol was a mainstay as the representative for the West Midlands Region for the Bat Crime Tactical Delivery Group, providing accurate data on Bat offence investigations whilst having oversight and offering critical direction to her region when required on bat crime.

Carol was the Rural Crime Coordinator for North Warwickshire Police where she worked on a lot of initiatives to tackle rural crime, including Warwickshire Rural Watch.

As a volunteer, Carol chaired Warwickshire Horse Watch - which she helped set up; and various other work supporting local Safer Neighbourhood Teams.

The impact of her work tackling rural crime has resulted in multiple awards including a Police Commendation and the British Empire Medal for her sustained, local contribution and innovative, high-impact delivery on crime prevention.

Carol's contributions have been exceptional, and she will be missed.

The image shows Police and Crime Commissioner Philip Seccombe of Warwickshire police presenting Carol with her Bat Conservation Trust *Certificate of thanks*.

