

make wildlife matter



ifaw

Spotlight on wildlife crime: Working with police and enforcers for change.



Photo: Melanie Mahoney / © IFAW

vision:
animals and people
thriving together.



Photo: Victor Rosales / © IFAW

mission:
fresh thinking
and bold action
for animals, people
and the place we
call home.

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About IFAW - IFAW (International Fund for Animal Welfare) is a global non-profit helping animals and people thrive together. We are experts and everyday people, working across seas, oceans and in more than 40 countries around the world. We rescue, rehabilitate and release animals, and we restore and protect their natural habitats. The problems we're up against are urgent and complicated. To solve them, we match fresh thinking with bold action. We partner with local communities, governments, nongovernmental organisations and businesses. Together, we pioneer new and innovative ways to help all species flourish. See how at [ifaw.org](https://www.ifaw.org)

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Wildlife crime – What to do if you witness it

Do not put yourself in any danger. Remember, the people inflicting pain and suffering on wild animals are dangerous and involved in criminal activity.

If you witness wildlife crime, contact the police by dialling 999.

For non-emergencies dial 101. You can also report crime anonymously to Crimestoppers on 0800 555111.

Volunteer action

IFAW has used dedicated and trained volunteer task forces in France and Germany to tackle wildlife trafficking online, [ifaw's cyber-spotter program tackles wildlife cybercrime](https://www.ifaw.org/uk/cyber-spotter-program-tackles-wildlife-cybercrime) | IFAW. These cyber-spotters identify suspicious wildlife products including live animals being sold to fuel the exotic pet trade and wild animal body parts sold as ornaments, clothing, and for traditional medicine. They report content

directly to IFAW campaigners, who then collaborate with online platforms to remove it and to improve and develop policies tackling wildlife cybercrime. There are plans for a similar task force in the UK. You can sign up for updates and take action on our campaign issues here: <https://www.ifaw.org/uk/take-action>.

Cover photo: A short-eared owl flies over a field.



foreword

I feel privileged to lead the National Wildlife Crime Unit (NWCU) and I am proud to have oversight of the UK Policing response for UK wildlife crime. The NWCU are here to help all police forces, we provide our service by consent so it's vital we build and maintain relationships and partnerships that have our animals at the heart of what we do. One of our objectives is to give a voice to the voiceless.

I have dedicated my policing career (20 years) to tackling wildlife crime. For the last 3 years I have led the NWCU and during this time it has evidenced my fears as I see the impact and scale of wildlife crime nationally and internationally. As the policing response adapts and

improves, the methods offenders use to persecute and exploit our animals also change too. In recent times I have seen wildlife crime transcend into the digital age and become cyber enabled across many priority areas. I have first-hand experience of organised crime groups who are exploiting animals and people to make ill-gotten financial gains by facilitating the illegal wildlife trade, and I have sadly seen the levels of cruelty and barbarity shown towards animals that far exceed my worst fears.

To give the best service we rely on relationships within policing. We also need the right partners and charities to help keep wildlife crime in the policing priorities. If it was

down to policing alone then wildlife crime would not be recognised by world governments and enforcement bodies.

Wildlife crime and specifically the illegal wildlife trade is one of the few areas of society where there is a total unified voice. Never underestimate the power of your views and voice in this area.

Without your voice, the real voiceless would remain so.

**Chief Inspector Kevin Kelly
Head of the National Wildlife Crime Unit**

▲ Chief Inspector Kevin Kelly.



executive summary

Poisoning, trapping and being set upon by dogs are just some of the thousands of largely hidden and horrific acts of crime and cruelty inflicted on UK wild animals, including badgers, hares, bats and birds of prey, annually. Yet inconsistent laws and limited resources mean limitations in policing and enforcement resources, and a lack of awareness of wildlife crime. This is according to new research commissioned by IFAW from criminologists at [Nottingham Trent University](#) and the [University of Gloucestershire](#).

This research involved a comprehensive review of UK wildlife law and enforcement responses since the [Law Commission's 2014 Wildlife Crime legislative review](#) and subsequent work. It drilled into this further through questionnaires and digital interviews with those on the front line of wildlife crime policing

and experts in the field. Participants in the 2022 research included [police officers](#) – specifically wildlife crime officers – [NGOs](#) and [legal experts](#). Their responses indicate the inequality accorded to wildlife crime throughout the UK and also mounting concerns about wildlife crime links to organised crime.

Twelve (29%) of the 41 [Offices for the Police and Crime Commissioner](#) participated and 16 (37%) of the 43 [police forces](#) via questionnaires. Nine [NGO](#) representatives, academics and other experts in fields relevant to wildlife crime and UK policing were interviewed. The criminologists also examined reports and literature relating to [UK](#) wildlife law developments and the legislation itself. This research took place against a backdrop of still-to-be implemented recommendations from the [United Nations Office on Drugs and Crime \(UNODC\) 2021 report](#)¹ on

how the [UK](#) can better tackle wildlife crime.

This report presents the story of those on the front line of wildlife crime enforcement, spotlighting some of the more prolific national crimes against our wildlife. It doesn't tackle the wider backdrop of the many international illegal wildlife trade challenges the [UK](#) also faces, for example, relating to the trade in ivory and rhino horn, which also impact how scant resources can be directed. The challenges however are created by the same enforcement gaps that affect domestic wildlife, thus addressing them will positively impact on domestic and international wildlife crime.

▲ A European badger on green grass.



Photo: © IFAW

unpicking a confusing patchwork

Crucially both [UNDOC](#) and the [Law Commission](#) recommend that the confusing patchwork of [UK](#) wildlife crime legislation be consolidated under one law – for example a wildlife management act.

Yet despite [UK government](#) claims during its [2021 G7](#) presidency that wildlife crime is a priority, [UNDOC](#) and [Law Commission](#) recommendations remain unaddressed. And there is still no national system in place to indicate which government body should take the lead in relation to the enforcement of wildlife crime.

Combined with relative government inaction on both recommendations, the research findings paint a grim picture of a nation where wildlife crime is given lower status. Where crimes against animals in the wild do not count in the same way as other crimes involving drugs, firearms and violence. And this is despite the long-recognised links between animal abuse and violence against people, and serious organised crime and wildlife crime.

making criminal links

Researchers have highlighted that criminal organisations are diversifying their portfolio from ‘traditional’

criminal activities, such as drug trafficking or human trafficking, into the illegal wildlife trade. This diversification is driven by the perception of the low risks of being caught and high profits.²

Studies also highlight the disturbing connection between animal abuse and crimes including rape, sexual homicide, domestic abuse and robbery. Research reveals that 70% of people found guilty of animal abuse have committed other crimes, and 100% of individuals who commit sexual homicide have a history of animal abuse.³

reporting and recording

[Police](#), [legal experts](#) and [NGOs](#) cite wildlife crime’s ‘non-notifiable’ legal status as a major source of its inequality under the law. Such status means incidents do not have to be reported by the [police](#) to the [Home Office](#) and recorded with national crime statistics.

Consequently, there is a reliance on [NGOs](#) such as the [RSPB](#), the [RSPCA](#), [Wildlife Trusts](#) and the [League Against Cruel Sports \(LACS\)](#) to gather data and fill gaps. [NGOs](#) interviewed by the criminologists shared concerns about escalating wildlife crime.

Combined [NGO](#) data, which is dependent on volunteers, shows an increase in wildlife crime of an

estimated 30% (from 1,056–1,414 incidents) between 2019 and 2021.⁴ The real figure is likely to be much higher—in the tens of thousands—because of the voluntary collation and non-official status of the [NGO](#) work.

Crimes reported included hares chased and ripped apart by dogs for bets, the shooting of birds of prey, the stealing of bird’s eggs, illegal fox hunting and badgers being dug out and baited – set upon by dogs. There are an estimated 30,000 annual offences against badgers alone in the UK.⁵

letting wild animals down

One [NGO](#) research participant commented that the system makes it not worth some officers’ time in investigating wildlife crime.

“Sadly, it’s let down at the very end stage ... some of these trials take 4–5 days and then the guy gets a £200 fine or only 60 hours community service. You can ask what’s the deterrent value in that?”²⁸

And because wildlife crimes occur under such a veil of secrecy and in remote places, overstretched police forces have difficulty allocating



resources to investigate and prosecute them.

The combined effect of law inconsistency, poor application and resource issues is that even the cruellest crimes against wild animals are seen not to count. Under UK law they simply do not matter as much as crimes involving drugs, firearms and violence against people. This is despite evidence of links between wildlife crime and other offences.

making them matter

To tackle the problem IFAW is launching our campaign *Make wildlife matter*. We will galvanise the public, politicians and organisations to press the government to protect our precious wildlife by introducing the following measures.

- ▶ Making wildlife crimes notifiable
- ▶ Harmonising, simplifying and streamlining all UK wildlife law
- ▶ Ensuring that there is at least one dedicated full-time wildlife crime officer per force
- ▶ Incorporating wildlife crime into the [Policing Education Qualification Framework](#)
- ▶ Developing enforcement, prosecution and sentencing

guidelines to combat inconsistencies around wildlife crime scenarios and how those should be dealt with.

See our detailed recommendations on page 25.

“For the three years I was head of the [National Wildlife Crime Unit \(NWCU\)](#) I was asked by several [Defra Ministers](#) how many wildlife crimes occurred in [Britain](#) and I had to tell them, “I don’t know”.

The reason being is that even in the twenty-first century I could not push a button that would tell me the number of wildlife crimes occurring. Why? Because police forces are not obliged to report wildlife crimes that in essence are not considered serious enough.

Therefore, it is impossible to get a true reflection of the extent of wildlife crime that could then inform British policing about the strategic threat that is posed to some of our most treasured wildlife such as bats, raptors and other protected species.”

Martin Sims, recent chair of Wildlife and Countryside Link’s wildlife crime working group, and former head of the NWCU²⁹

30%

estimated increase in wildlife crime (from 1,056–1,414 incidents) between 2019 and 2021

70%

of people found guilty of animal abuse have committed other crimes, and 100% of individuals who commit sexual homicide have a history of animal abuse²

30,000

estimated annual offences against badgers alone in the UK

IFAW are a member of the Wildlife and Countryside Link. A Link dossier was presented to the Home Office on the ‘case for notifiable status’, which we support and would like to see considered.

▲ An American mink on snow-covered ground.

◀ A wet and harassed fox cub that was chased during the Chiddingfold, Leconfield, Cowdray Hunt in the UK.



introduction

This report *Make wildlife matter – Spotlight on wildlife crime: Working with police and enforcers for change* focuses on the issues surrounding wildlife crime in the [UK](#). It is aimed at everyone determined to give UK animals in the wild protection from cruelty and suffering, and paints a powerful picture of legislative inadequacy and under-resourcing. *Make wildlife matter* draws on research commissioned by IFAW and led by criminologists from [Nottingham Trent University](#), working

with the [University of Gloucestershire](#) from May to November 2022.

Their research involved digital questionnaires with 16 [police officers](#) – many with wildlife crime officer remits – from 16 police forces and 12 [Police and Crime Commissioner respondents](#). Nine [NGO](#) representatives, academics and other experts in fields relevant to wildlife crime and UK policing were also interviewed.

The criminologists also examined reports and literature relating to UK wildlife law developments and the legislation itself. The full research document *Policing Wildlife: The Nature of Wildlife Crime in the UK and its Public Policy Response* will be made available alongside this publication on IFAW's website.

▲ A single stag deer standing in a field.



about wildlife crime

what is wildlife crime?

Wildlife crime can be broadly defined as the illegal exploitation of wildlife species. This includes poaching (i.e. illegal hunting, fishing, killing or capturing), and the abuse and/or trafficking of wild animal species.

Wildlife crime is one of the most lucrative forms of criminal activity globally.⁶ Natural resources – wild animals and plants – ‘worth as much as USD 91 billion to USD 258 billion annually are stolen – stripped out of the wild – by criminals’ according to [Interpol](#) and the [United Nations Environment Programme \(UNEP\)](#).⁷ Behind these figures, is the horrendous pain and cruelty inflicted on animals and catastrophic effects on biodiversity the crimes involve.

In the [UK](#) IFAW are concerned that there are misconceptions that wildlife crime is largely an international issue affecting wildlife in [Asia](#) and [Africa](#) and linked with the trafficking of exotic wild animal parts. Although the import and export of endangered exotic species into the [UK](#) is of serious concern, wildlife crime is also very much a domestic [UK](#) problem.

Links with organised crime means it can have a very negative effect on the communities where it happens. People living in areas where hare coursing and badger digging and baiting occur, for example, have been subjected to intimidation and destruction of property.

One of the academic expert participants interviewed in the research explained:

“The hare coursing gangs are violent, are often violent criminals. They’ll arrive and seriously threaten farmers... Farmers come across them on their land and the farmers are left in no doubt that if they phone the police straight away, they and their farm are in serious, serious trouble in the near future... absolutely credible threats of that. So, it’s very hard to isolate wildlife crime from wider criminality, from wider social issues as well.”⁸

US\$ 91 billion+

to USD 258 billion of natural resources - wild animals and plants - are stolen annually by criminals.

▲ A greyhound races after a hare at the annual Waterloo Cup hare coursing event near Liverpool, England.



UK law relating to wildlife crime

Under UK law, wildlife is generally defined as any non-domesticated non-human animal. [The Wildlife and Countryside Act 1981](#) is the main legislation protecting wildlife in Britain. It defines wildlife with criteria specifying wildlife as animals living 'naturally' in a wild state and excludes wild animals bred in captivity.⁹ It is also aligned with the [European Union's \(EU\) Bird Directive](#) which aims to enhance the protection of all European wild and native birds.¹⁰

Other key wildlife protection laws are outlined in the table. In their number they have led to inconsistency in enforcement, prosecution approaches and loopholes that enable perpetrators to get away with crimes.¹¹ There are national variations to UK wildlife laws too. For example, badgers have different protection in [Scotland](#) than they do in [England](#).

In the [UK](#), the the illegal import of wildlife for particular species attracts significant media attention and fines. For example, the trade in elephant teeth and tusks is illegal in the [UK](#) and punishable by fines of up to £250,000 or up to five years in prison under the [Ivory Act 2018](#). Trade and activity that may significantly affect endangered species such as elephants is covered by [CITES](#) and [COTES](#) and emphasises the need to record related crimes nationally. Many domestic wildlife crimes are not afforded the same status, despite the grave impact on national wildlife.

Notifiable status means crimes have to be reported to the [Home Office](#), and with specific coding, making them worthy of being counted and part of UK crime statistics.

Legislation/Policy	Description
Deer Act 1991	Reformed the Deer Act 1980 and introduced protective regulation relating to the safeguarding of all six deer species present in the UK. The Act set closed seasons for all six species making it a criminal offence to take or kill any deer within this season, the legislation also banned use of specific weapons and articles in which to trap, snare or poison deer. Under the Act it is illegal to hunt deer at night. Exceptions to offences permitted in some circumstances e.g., where the deer is on private land, where the deer pose a threat to public health and safety, and also where the deer becomes invasive to natural habitats and heritage (in England).
Protection of Badgers Act 1992	Consolidates badger protection and creates offences in respect of: <ul style="list-style-type: none"> ▶ Killing, injuring or taking of a badger. ▶ Ill-treatment or cruelty to a badger. ▶ Interfering with a badger sett (home) by causing damage, destruction, obstruction or forcing a dog to enter a sett (highlighting the involvement of dogs in badger baiting). ▶ Sale or possession of a live badger. ▶ Marking or ringing a badger (e.g., attaching a tag or other forms of marking devices).
Wild Mammals Protection Act 1996	Makes it a criminal offence if any person inflicts or is intent on inflicting suffering on a wild mammal through methods such as mutilation, kicking, beating, impaling, stabbing, burning, stoning, crushing, drowning, dragging or asphyxiating. A possible defence exists if the offence can be argued as a method of mercy-killing or carried out for the control of pests.
Protection of Wild Mammals Scotland Act 2002	Bans the use of dogs in hunting wild mammals such as foxes, mink, hares and deer. Contains exceptions in respect of stalking and flushing from cover, use of dogs in falconry and shooting and searching for a wild mammal with no intention of harming that mammal.
Hunting Act 2004	Bans the use of dogs in hunting wild mammals such as foxes, mink, hares and deer, however it does not ban the use of dogs in the hunting process (such as flushing out and finding wild animals).
Wildlife and Natural Environment Scotland Act 2011	Provides protection for Scottish wildlife and specifies prohibited methods of taking or killing wild birds and specially protected animals. The Act amends earlier environmental legislation, including the Wildlife and Countryside Act 1981 and the Deer Act 1996.
Control of Trade in Endangered Species Regulations 2018 (COTES)	Implements the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The UK's earlier COTES Regulations implemented Council Regulation (EC) No 338/97. Following the UK's departure from the EU new COTES regulations were implemented.

◀ European badger by a tree in the forest. Badgers have different protection in Scotland than they do in England.



Photo: © Beau Considerne, CC BY-NC 2.0

legal loopholes – when killing and cruelty is allowed

Not all violence and harm directed towards wild animals is against the law. In some cases, some UK wildlife laws actually permits harm which is not acceptable under other UK wildlife laws. There are legally permissible actions that allow wildlife to be killed or taken for conservation management purposes. These could include:

- ▶ culling to maintain herd health or to conserve other wildlife – for example, badger and deer culls
- ▶ killing for legal (and regulated) sporting interests such as shooting and fishing – certain species of game birds, quarry birds and waterfowl can be shot in ‘shooting season’

- ▶ protecting farming or other commercial interests such as the killing of so-called ‘pest’ species, in some cases rabbits.

A key issue underpinning legal perceptions of wildlife crime in the UK is that it is treated as a victimless crime. Victims are traditionally defined as human while wild animals are viewed as a resource available for human use and exploitation. Consequently, the lines between legal and illegal use of wildlife are often blurred.¹² Wildlife crime is only ever likely to feature as a priority or to be deemed serious in nature if there is a human impact. The end result is that wildlife has no voice and relies on the visible impact of the crime for a response.

An NGO wildlife crime expert interviewed for the research commented:

“We need proper guidance from the Sentencing Council [an independent, non-departmental public body linked with the Ministry of Justice]. I know the Sentencing Council is somewhat removed from government, but you know we need a priority for wildlife crime and for the sentencing guidelines for wildlife crime to be very clearly laid out for magistrates and prosecutors. So that magistrates and judges know they understand the options that are available to them and that they understand the seriousness of these crimes and the serious impacts they have...

I think wildlife crime has been kind of regarded as a victimless crime, and that’s partly why it hasn’t been taken seriously enough.”¹³

▲ Fox hunters riding horses accompanied by coonhounds.



raptors killed on Norfolk pheasant shoot

Wildlife and Countryside Link Wildlife Crime in 2021 report – RSPB submission abridged

Gamekeeper Matthew Stroud was convicted of multiple raptor persecution offences in Norfolk. Offences included shooting five buzzards and one goshawk, the poisoning of another buzzard, the laying of poison baits and illegal possession of poisons including a banned poison strychnine and phostoxin, a dangerous fumigant which was stored improperly. He received a 200-hour community order and was ordered to pay fines, costs and compensation totalling more than £1,200.

The RSPB Investigations team conducted lengthy enquiries on an area of land managed by Stroud for pheasant shooting at Fengate Farm in Weeting. Following a number of visits, in August 2021 they discovered a pheasant carcass – later found to also contain strychnine.

The use of a poison bait such as a pheasant, laced with pesticides, is one of the most common methods of illegally killing birds of prey.

A subsequent search with Norfolk Police and partners uncovered further poison baits plus shot and

poisoned raptors. Stroud's phone also contained the photo of a goshawk and several buzzards which he admitted to shooting.

Stroud also became the first person convicted for the unauthorised release of gamebirds on a Special Protection Area. However, it was difficult not to be disappointed with the outcome considering the significance of the offences.

▲ Close-up of an adult buzzard standing in purple heather on managed moorland in Nidderdale, Yorkshire Dales.



harmonising the law

The [United Nations Office on Drugs and Crime \(UNODC\)](#) in 2021¹⁴ and the [Law Commission's](#) wildlife crime review in 2015 recommend that the patchwork of [UK](#) wildlife legislation – some dating back to 1831 – be harmonised under one law. When implemented, these recommendations, so far ignored by the [UK government](#), will make the law governing the protection, control and management of wildlife more consistent, easier to understand and simpler to use.

““The legislation [domestic] is so scattered and there are so many disparities between the UK’s constitute countries...There’s great need for harmonization. I think there’s like 40 different statutes that are out there in relation to wildlife crime.”

Academic expert speaking to researchers 2022¹⁵

▲ Man shooting birds in field of flowers.



hunt terrierman sentenced for cruelty to a fox

Wildlife and Countryside Link Wildlife Crime in 2021 report¹⁶

Contribution from the League Against Cruel Sports (LACS)

In December 2021, the terrierman for the East Essex hunt, Paul O'Shea, was caught being filmed flushing a fox from an artificial earth with the use of a hard 'terrier' (one that will still attack and bite a fox as opposed to stand off and indicate).

The horrific and graphic film footage also showed O'Shea then trying to pin the fox to the ground using a four-pronged fork. The footage was handed to Essex Police which resulted in O'Shea being interviewed and subsequently charged with two offences of illegal hunting and causing an animal unnecessary suffering.

He pleaded guilty to both offences. O'Shea was banned

from keeping dogs for five years, fined £233, received an 18-week custodial sentence that was suspended for two years and also handed a 200-hour community service order. This sentence was significant as since the Animal Welfare (Sentencing) Act 2021 was enacted, offenders are liable for a custodial sentence of up to five years.

▲ A young red fox hunting in a field after harvest.



Photo: © RSPB Scotland

setting the UK's wildlife crime priorities

The [National Wildlife Crime Unit \(NWCU\)](#) identifies seven key priority areas of wildlife crime in the [UK](#). This government-funded body collects wildlife and wildlife-crime related data from organisations – including the police – and assists the police in prevention and detection of wildlife crime. Their analysis highlights local and national threats to wildlife. The current priorities, which are reviewed every couple of years, follow below¹⁷.

- ▶ **Badger persecution** – this includes the horrific practice of badger baiting where badgers are dug out and set upon by dogs. It can also involve poisoning, gassing, snaring, shooting and sett disturbance/destruction. Despite badgers having one of the highest levels of protection in law, the [Badger Trust](#) estimates 30,000 badgers fall victim to wildlife crime each year.
- ▶ **Bat crime** – this can involve the destruction of roosts, hunting or killing these endangered animals. According to the Bat Conservation Trust, 97% of bat crime incidents reported to the police in 2018 involved damage/destruction of roosts.¹⁸

- ▶ **CITES issues** – these include the illegal trade in raptors such as falcons and buzzards; ivory; medicinal and health products such as bear bile, lion bones and pangolin scales; reptiles including snakes, lizards and tortoises, and rhino horn and timber. [CITES](#) linked wildlife crimes are classified as notifiable in the [UK](#).

- ▶ **The collection of freshwater pearl mussels** – The quest for pearls has led to the extinction of populations of this species from many rivers. These critically endangered molluscs are very important to ecosystems because of their water filtration abilities. It's estimated only 1 in 1,000 mussels will contain a pearl.

- ▶ **The poaching of deer and fish, and hare coursing**, where dogs are used to chase, catch and kill hares.

- ▶ **The persecution of raptors** such as hawks, eagles, kites, buzzards, harriers, falcons and owls through poisoning, shooting, trapping, habitat and nest destruction/disturbance.

- ▶ **Cyber-enabled wildlife crime** – There is a large UK market for exotic species and the trade takes many forms such as taxidermy, skulls, plants and bones as well as tusks, teeth, feathers, skins and claws. Online platforms facilitate this trade domestically and globally.¹⁹

Wild animals have a lower level of protection against cruelty in the UK than pet and farm animals, adding to the picture that their pain and suffering simply does not count. And this lack of protection is underpinned by the 'victimless' perception of wildlife crimes.

30,000

estimated badgers fall victim to wildlife crime each year

97%

of bat crime incidents reported to the police in 2018 involved damage/destruction of roost

▲ Young golden eagle found poisoned on a grouse moor in the Cairngorms National Park laying next to a dead mountain hare that had been used as the poisoned bait.



poacher who took £60k of salmon and trout from Welsh river avoids prison

Steven Morris
The Guardian 8 July 2022
(abridged)²⁰

The ringleader of a fish-poaching operation that caused “staggering damage” to salmon and sea trout populations in a Welsh river, has avoided prison after a judge expressed regret that he did not have the power to give him a custodial sentence.

Bricklayer Emlyn Rees, 35, from the village of Cenarth in Carmarthenshire, headed an operation that caught 989 sea trout and 302 salmon over seven years.

The judge at Swansea crown court told Rees he would probably have sentenced him to time in prison if he had the power, but

instead fined him £1,600 and had his fishing equipment confiscated. The judge also made a confiscation order for £61,791.50 – the value of the fish – but as Rees claimed he had no savings, he was ordered to pay a nominal £1.

The investigation was triggered after Natural Resources Wales (NRW) enforcement officers patrolling a stretch of the River Teifi near Cenarth found that a net was illegally set in the river. They watched the river overnight and spotted a poacher return to check the net.

He escaped by jumping into the river but was traced to his home, where a detailed ledger of his illegal catches was found.

NRW said the illegal fishing by Rees and his associates led to the loss of an estimated 686,534 salmon eggs and 2,285,164 sea trout eggs.

Judge Thomas told Rees: “It is surprising that there is no custodial option. Had there been, the chances are I would have taken that custodial option. You have been a persistent poacher of salmon over many, many years. You had significant impacts on fish stocks in the river.”

The operation involved 25 police officers from the force and nine NRW enforcement officers.

▲ Atlantic salmon leaping upstream during salmon run in the UK.



who fights wildlife crime in the UK?

[Police forces](#) are expected to be the first port of call regarding wildlife crime. [Police Scotland](#) is a single force responsible for policing across [Scotland](#). In most cases, the police service can enforce relevant legislation. In some cases, however, this power falls to other statutory agencies, such as [Natural England](#) and the [Welsh Government](#) for poisoning incidents, or the [Environment Agency](#) for unlicensed fishing.

All police forces have wildlife crime under their remit, but they are operating against a backdrop of austerity. In 2019 there were 20,000 fewer police officers than in 2009.²¹ Many but not all police forces have at least one wildlife crime officer.

These officers are specially trained in wildlife crime detection and prosecution, but normally undertake their wildlife duties on top of all their other policing work leaving little time

to actually focus on wildlife crime. Many volunteer to take on the responsibility because of their interest, however, a few forces have a full-time wildlife crime officer.

The research found there is inconsistency in how the wildlife crime officer role is implemented and supported. Local response very much depends on the dedication and experience of existing officers and in some cases support from [NGOs](#). Under resourcing results in wildlife crime being considered a low level offence.

NGO action against wildlife crime

Other bodies (statutory, enforcement and voluntary / campaigning) are also involved in combating or monitoring wildlife crime. These include [NGOs](#) with a wildlife protection focus such as the [RSPB](#), [LACS](#), the [RSPCA](#) and

the [Bat Conservation Trust](#). There is close collaboration between such [NGOs](#), the government funded [NWCUC](#) and [The Partnership for Action Against Wildlife Crime UK \(PAW UK\)](#). [PAW](#) meets twice yearly and helps statutory and non-government organisations to work together to reduce wildlife crime.

Despite the level of interest, the number of organisations involved and government statements that wildlife crime is taken seriously, this report suggests that it lacks importance in policing priorities. Consequently, enforcement remains heavily dependent on [NGOs](#).

▲ Flying pipistrelle bat.



what is stopping change for wildlife?

The situation is not likely to improve for wildlife until the law and policy changes to make crimes against them become 'notifiable' and counted by the [Home Office](#).

Offences that are not notifiable are recorded as miscellaneous, and so are difficult to measure. This makes them less of an incentive to investigate even though there is strong evidence for links between some wildlife offenders and serious organised crime.

Such potential links have been documented by many sources over the years including the [NSPCC](#), [WWF](#) and [TRAFFIC International](#).

Associated criminality has been found to include drugs, firearms, property, violence and disorder related.²²

making wildlife matter

Changing the law and the policy approach so that wildlife offences are notifiable, and ensuring proper resourcing is essential to make wildlife crime a priority in the [UK](#). There is a long history of concern around the priority afforded to wildlife crime.

[Naturewatch](#) surveys as early as 2005 of police wildlife crime officers – with

87% of forces responding – agreed that serious wildlife crimes should be notifiable. And [NGO](#) presentations from 2012 onwards to the Environmental Audit Committee called for this type of crime to be more formally recordable.

▲ A wild hare in a field of grass.



wildlife crime – a police priority?

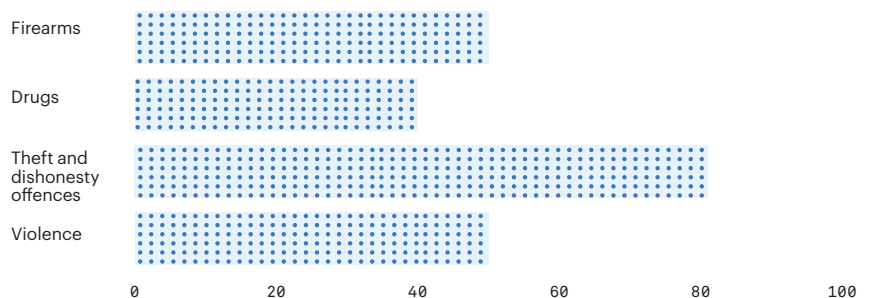
Written police officer response 2022

Of the police forces who responded to researchers, thirteen of them (81%) said that wildlife crime is never treated with the same priority as more traditional types of crime. Three, however, said that sometimes it was.

Thirteen forces (81%) also felt that wildlife crime was linked to theft and dishonesty offences. Fifty percent highlighted links to firearms, six forces (38%) linked it to drugs, and eight forces (50%) felt that wildlife crime was connected to violent crimes.

And nine forces (56%) said that wildlife crime should be given the same priority as more traditional types of crime. There was recognition of the links between offences committed against animals and violence towards humans.

Offences linked to wildlife crime



“Wildlife crime is also linked to anti-social behaviour, but it has its own right to be investigated at the same level as other more traditional crimes. There is legislation in place to protect wildlife and therefore it is a police responsibility to investigate unlawful acts.

Wildlife crime creates concerns amongst local communities who

report it to the police and expect action to be taken. It has an impact on the environment, biodiversity and communities. Finally, there are proven links between offences committed against animals and violence towards humans, with offenders eventually moving from animals to commit violent crime against humans.”

Police Force Respondent²³

policing attitudes to wildlife crime

All 16 respondents said that wildlife crime was not regarded as an important role for the police. For those forces who expanded on their answers they said it was mostly not regarded as important but in some respects it could be.

For example, some said that rural communities found this an important aspect of policing. They pointed out that this is against a backdrop of the public more generally starting to take more of an interest, particularly with re-wilding and climate change featuring in mainstream media more.

Most said that the police as an organisation did not think wildlife crime was an important role for police, with these views often mirrored by other officers. However, those working in or with a wider understanding of wildlife crime, felt it was a very important role for policing.

All [Police and Crime Commission](#) respondents said they believed that wildlife crime is viewed differently to more traditional types of crime. The key reasons included that wildlife crimes having a lesser status in legislation as they are not notifiable. They said because there is not a human victim, there is under reporting and a perception of less threat, harm and risk.

“There is a human victim on the end of burglary, rape and robbery with a level of harm that can be articulated. These crimes are also more generally reported and so the demand is understood. However, wildlife crime is so broad, misunderstood and under-reported that the true impact is not understood.”³⁰

lack of resourcing an issue

Twelve forces (62%) said that they needed more resources including equipment, additional staffing and better training to successfully investigate and prosecute wildlife crime. Thermal binoculars, drones,

quad bikes and better vehicles were listed as important equipment. One officer stated that the aforementioned equipment is important to catch criminals involved in hare coursing - the most prevalent offence in his region which had more than 700 recorded incidents in 2021.

Just six of the 16 forces (38%) said that they had access to all the resources and equipment they needed to perform their wildlife crime officer roles.

working partners

Fourteen of the 16 forces (88%) said that they regularly work with non-governmental organisations. Those cited included the [RSPCA](#), the [RSPB](#), various [Wildlife Trusts](#), [Environment Agency](#), [British Association for Shooting and Conservation \(BASC\)](#), the [National Gamekeepers Organisation](#), [Badger Trust](#), [Bat Conservation Trust](#), [LACS](#) and the [National Farmers Union](#) and the [Country Landowners Association](#).

Respondents also highlighted partnerships with other police forces, other enforcement agencies, the [NWCU](#) and the local authority.

enforcing concerns

The academic and [NGO](#) participants interviewed by the researchers raised concerns about the lack of available expertise in some areas. They were concerned that wildlife crime enforcement is regarded as a ‘fringe’ area of policing, with a system insufficient to deal with contemporary wildlife crime problems.

A general lack of understanding of wildlife crime issues among enforcers was felt to be an issue. This resulted in effective wildlife crime enforcement being heavily dependent on the enthusiasm, dedication and specialist knowledge of individual officers.

They felt the lack of a clear, coordinated, effective system in place across the [UK](#) meant enforcement response varied. [Police Crime Commissioner](#) respondents indicated

a clear belief that some police forces investigate and respond to wildlife crimes better than others. Concerns were raised about difficulties accessing specialist prosecution expertise and guidelines, and training on evidentiary requirements for wildlife crime cases. Consequently, consistency regarding investigations and offences is lacking.

The prevention of wildlife crime is also not seen as a priority for policing. One academic expert summarised the concern.

“Proactive problem-oriented crime prevention, partnership working all of those things are generally more effective forms of policing than reactive. I think that wildlife crime enforcement, as it’s currently set up doesn’t have the resources, doesn’t necessarily have the expertise... certainly doesn’t have the time to do that more beneficial type of work.”²⁴

The fact that wildlife crimes are not notifiable was repeatedly raised as an issue. One of the police officers interviewed said: “If you brought in overnight that wildlife offences would be notifiable, it may force forces to reconsider how they record crime. This is because they’d be set to task if they didn’t record it properly, and secondly, we’d probably be held to account for the way we then investigate those crimes, and with wildlife and rural crimes it isn’t given a classification, but it is thought of subconsciously as a less important crime.”²⁵

In response to 2013 research, police officers widely commented that wildlife offences should be made notifiable. Nine years later, for the 2022 research, police officers reiterated that the response to wildlife policing in the [UK](#) would be improved if offences were notifiable.

Notifiability would mean increased accountability, increased status and potentially more structure in the response to this area of business as the demand on police would be recorded by the Home Office.

◀ Poacher Watch Area sign in the British countryside.



how austerity is affecting the wildlife crime officer role

The research found that the number of full-time wildlife crime officers has fluctuated since a 2013 survey. This revealed that an estimated third of police forces had dedicated wildlife crime officers in the [UK](#). Overall policing numbers were cut by the coalition's government's austerity measures in 2010 which would have inevitably affected the prioritising of wildlife crime.

All [NGO](#) and academic research participants commented that the wildlife crime officer role was one that needed to be properly resourced and supported. There was general agreement that the role should be dedicated rather than one carried out alongside other duties. A key theme emerging from the research is the extent to which wildlife crime officers' duties risked being voluntary or part time.

One expert commented:

"If you've got competing priorities, wildlife loses out and they just end up spending their time on your normal kind of routine stuff and the wildlife just doesn't get taken care of."²⁶

grouping with rural crime

The remaining 12 forces who responded to our 2022 survey (75%) stated that they have dedicated wildlife crime officers. However, 11 of these forces went on to say that the dedicated wildlife crime officer role is grouped in with rural crime more generally. It has not been established how much time is spent dealing with wildlife crime versus the more traditional types of crime such as theft and burglary that affects rural communities.

There is inconsistency in how the wildlife crime officer role is constituted. Four police forces (25%) advised that they have wildlife crime officers who undertake this role on a voluntary part time basis alongside their full-time policing role. One police officer interviewed for this research explained that a consequence of this is wildlife crime potentially becoming a secondary issue against the provision of essential or priority policing services.

25%

of police forces advised that they have wildlife crime officers who undertake the role on a voluntary part time basis alongside their full-time policing role

▲ The Wildlife & Rural Crime Officer's patrol car from Humberside Police Force parked in Beverley, UK.

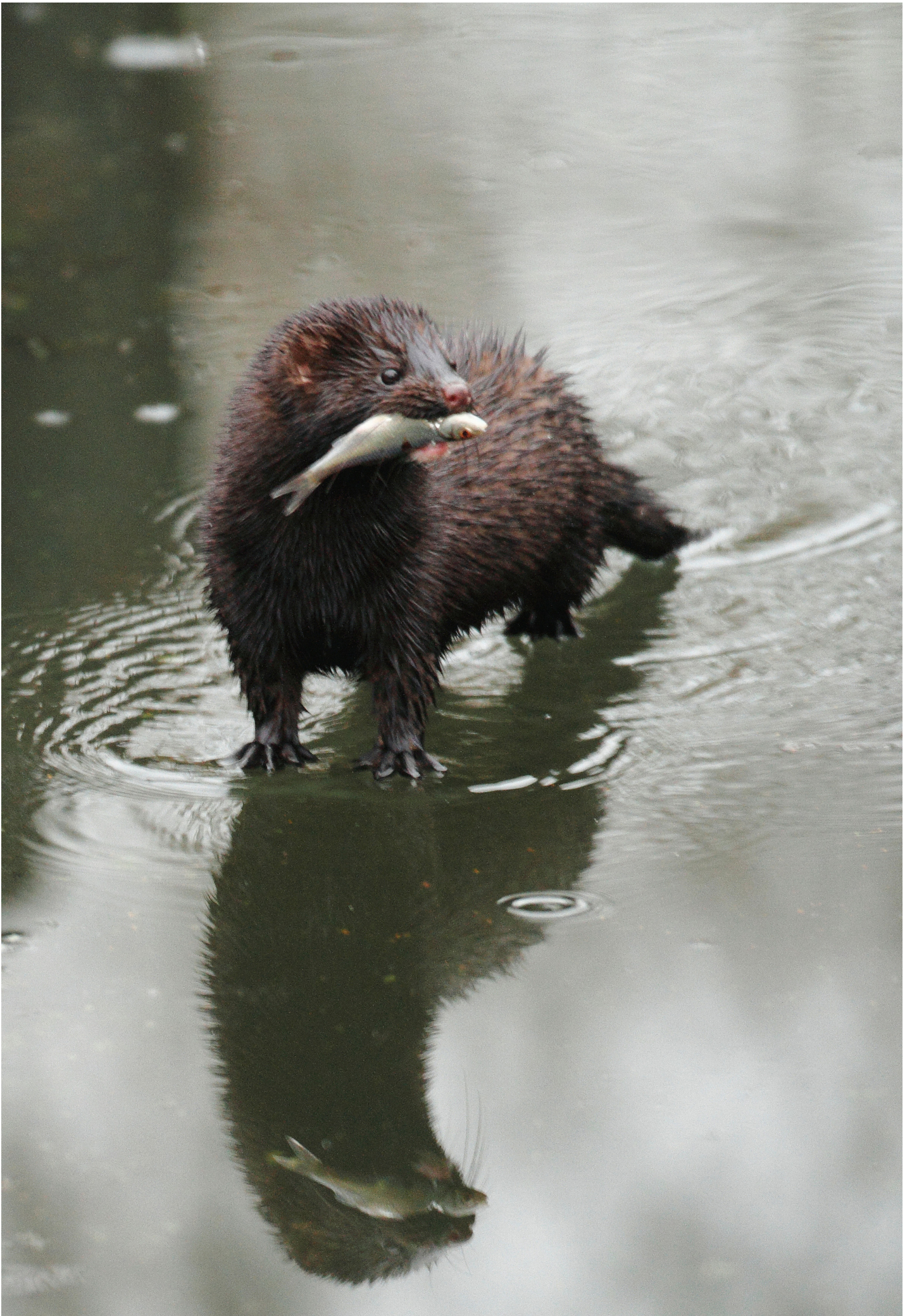


conclusion

The research has revealed the following key themes regarding wildlife crime in the [UK](#).

- ▶ Wildlife crime does not have the same priority as ‘mainstream’ crimes. And so, where there is competition for resources, wildlife crime is likely to lose out because it is still primarily seen as a lesser offence without human victims.
 - ▶ The priority given to wildlife crimes varies between regions and police forces. This is largely because it is not mandated as a policing priority by the Home Office/Ministry of Justice. It is also up to Chief Police Officers to decide how they allocate their resources and determine local priorities.
 - ▶ Wildlife crimes have a lesser status in legislation. This is because they are not notifiable and are generally summary only offences not attracting heavier sentences.
- Consequently, there is a lack of clear data on the level of wildlife crimes.
- ▶ Internationally, there are moves to have wildlife crime considered as serious crime, but the [UK’s](#) legislative framework does not fully place wildlife crime in the ‘serious’ bracket.
 - ▶ Gathering sufficient and reliable evidence to prosecute wildlife crime cases is a problem because of the remote nature of many wildlife crimes. Furthermore, the evidentiary requirements for prosecution are not always clearly understood.
 - ▶ Despite the valuable contribution of the NWCU to wildlife crime policing, it lacks permanent funding. This is a further indication that under UK policy, wildlife simply doesn’t count as much as it should.
- ▶ There is an inconsistency of approach across police forces regarding wildlife crime officers. A few forces have dedicated officers; other forces may make responsibility for wildlife crime a voluntary addition to a police officer’s existing duties, grouping it with rural crime.
 - ▶ Wildlife policing is primarily reactive and wildlife crime is an under-resourced area heavily reliant on the dedication of individual enforcement officers and, in some cases, support from [NGOs](#).
 - ▶ The overall picture is one of wildlife crime as insufficiently resourced. This affects the way police forces provide for wildlife crime officers through to the provision of scientific and forensic support for the investigation of wildlife crimes.

▲ Close-up of a common buzzard.





next steps – together we can make wildlife matter

The research paints a bleak picture of the way crimes against wildlife are perceived and dealt with in the UK. Central to this is their non-notifiable status giving them a lower priority in policing than other crimes. This is despite the commitment and hard work of dedicated wildlife crime officers, the work of NGOs and calls by the UN, the Law Commission and the public for change. To support our calls to action, ongoing collaboration between NGOs, agencies and academic institutions is critical.

Our **Make Wildlife Matter campaign** is calling for:

- ▶ **Wildlife crimes in the UK to be classified as 'notifiable'** so that concerned agencies have the true dark picture of wildlife crime and are better equipped to fund tackling them. Recording of incidents should distinguish between different types of crimes, the species involved and with dedicated coding.

- ▶ **Harmonisation of wildlife law to close any loopholes and discrepancies**, with a fresh review of wildlife law to revisit the outstanding issues and assess the aspects that may be difficult to enforce. Many of the issues identified in the Law Commission's 2015 review remain unresolved.

- ▶ **Enforcement and prosecutorial guidance to be developed.** These should provide examples of wildlife crime scenarios and how those should be dealt with. They should also be complemented by binding Sentencing Council guidelines reflecting the varied nature of wildlife crime and extent to which actions were deliberate.

- ▶ **A minimum of one dedicated full-time wildlife crime officer per force**, to address the resource gaps identified in the research. It's vital that wildlife crime is considered a specialist area rather than incorporated into rural crime issues.

- ▶ **Wildlife crime to be fully incorporated into the Policing Education Qualification Framework**, so that police officers have basic wildlife crime knowledge as part of their training.

To make wildlife matter, crimes against them must truly count. They must be recordable and transparent. Only in this way can all agencies involved in enforcement tackle these crimes against wildlife which inflict horrific cruelty and abuse and destroy our wild spaces.

Making wildlife crimes notifiable will help our government fulfil UNODC's 2021²⁷ recommendations. This will establish our nation as a true role model to other countries through our powerful approach to tackling wildlife crime.

With your help we can beat wildlife crime and make wild animals truly count. Please join us.

▲ A barn owl flying through the trees.

◀ A mink standing in the water with a freshly-caught fish in its mouth in Fairburn Ings Nature Reserve, West Yorkshire, UK.



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◀ Close up of Northern Goshawk.

our thanks and future research

We would like to thank the dedicated team at [Nottingham Trent University](https://www.ntu.ac.uk) and their partners at the [University of Gloucestershire](https://www.glos.ac.uk) for their valuable work.

IFAW will continue to develop, commission and release further research on UK wildlife crime prosecution practice and sentencing to support our efforts to

protect our wildlife. This will be alongside our continued efforts to understand and combat national, regional and global illegal wildlife trade patterns that impact our planet. If you want to hear more about this, support or partner with us, please get in touch with us - info-uk@ifaw.org or visit our 'take action' page <https://www.ifaw.org/uk/take-action>.

International Fund
for Animal Welfare

Make Wildlife Matter – Spotlight
on Wildlife Crime: Working with
Police and Enforcers for Change.

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