

Strategic Assessment – UK Wildlife Crime 2018

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- Public version



Security Classification:	OFFICIAL
Author(s):	NWCU
Owner:	Chair of UKTCG
Date Completed:	06/06/2018
Version:	Final for Publication

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Overview

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

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

In the UK, the setting of wildlife crime priorities is done by the UK Tasking & Coordination Group (UKTCG) chaired by the NPCC¹ lead for wildlife crime – currently North Yorkshire Police. The UKTCG ratifies the areas which should become national wildlife crime priorities. Their decisions are based upon recommendations contained within this Strategic Assessment, which is prepared by the NWCUC. Aims and objectives for the Strategic Assessment are outlined in Appendix A. The UKTCG hold a strategic meeting every second year and priorities are set for the forthcoming two year period. The NWCUC's recommendations regarding the priority areas are formulated via a two-pronged approach:

- 1) The Wildlife Crime Conservation Advisory Group (WCCAG) advise NWCUC in relation to the **conservation** importance of species and habitats and the importance of enforcement intervention. The WCCAG use a scoring matrix to assess the significance of crime against the species/habitats concerned; the conservation importance of the species/habitat and the need for enforcement action to deter offenders and thereby reduce future damage to wildlife. Recommendations/actions agreed by the WCCAG are sent by JNCC (WCCAG Secretariat) to the NWCUC for inclusion in the Strategic Assessment.
- 2) The NWCUC assess all other wildlife crimes. This is done via a MoRiLE² risk assessment approach.

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

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

¹ National Police Chiefs Council

² Management of Risk in Law Enforcement

WCCAG Review of UK Wildlife Crime Conservation Priorities

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

The WCCAG met on 20th February 2018 to review the existing wildlife crime **conservation** priorities and identify any new or emerging priorities using established criteria and scoring matrices. Although a number of changes to the scores were agreed by the WCCAG, the following taxa remain as the highest scoring (non-CITES³) **conservation** priorities for enforcement action:

- Bats.
- Freshwater Pearl Mussel (FWPM).
- Raptors – Golden Eagle, Goshawk, Hen Harrier, Peregrine Falcon, Red Kite and White Tailed Eagle.

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

A separate exercise was undertaken to review the **CITES** priorities. These areas were subsequently discussed at the CITES Priority Delivery Group meeting⁴ and the following were recommended to be put forward as the UK's wildlife crime CITES priorities for 2018 - 2020⁵:

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

³ Convention for International Trade in Endangered Species

⁴ March 14th 2018

⁵ The priority areas of rhino horn and the illegal trade in reptiles are subject to review as part of ongoing intelligence processes

MoRiLE Review of UK Wildlife Crime Non-Conservation Priorities

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

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

The key features of the MoRiLE process are:

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

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

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

NWCU also consulted with subject experts to score several other key non-priority areas - Finch Trapping⁶, Illegal Shell Fishing⁷ and Egg Theft⁸. These are areas upon which NWCU continue to receive intelligence but are not considered under the WCCAG scoring.

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

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

⁶ With advice from RSPCA

⁷ With advice from MMO

⁸ With advice from RSPB

Thematic Threat Areas

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

Cyber Crime

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

Organised Crime Groups

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

Violence and Community Tension

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

Wildlife crime guidance

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

Enforcement of Wildlife Crime and Future NWCU strategy

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

- Establish senior officer leads for all police forces in tackling wildlife crime and raising internal police awareness.
- Secure future funding [for] dedicated Police Wildlife Crime Officers (PWCO's).
- Seek accreditation for national training for PWCO's from the College of Policing.

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

Proposed NWCUC Response to Wildlife Crime Priorities

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

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

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

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

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

To support Police Forces and partners in criminal investigations where required.

NWCUC Investigative Support Officers will continue to support investigations where required, regardless of priority status. NWCUC ISO's regularly support investigations into non priority areas (such as SSSI damage, the illegal trade in parrots or the release of non-native species). If additional ISO support is imperative in any investigation, it will be provided whenever possible⁹.

To identify Organised Crime Groups (OCG's) involved in wildlife crime through the information sharing process.

Analytical staff should identify OCG's across England & Wales for all relevant priority areas, both **conservation** and **non-conservation**.

To enhance cross-border work amongst police forces and partners.

This strand would follow directly from the identification of OCG's but would also apply even for non-priority areas, provided cross border work is clearly vital - such as with Operation EASTER, which NWCUC supports on a yearly basis.

⁹ Subject to capacity

To develop methods of working together between all agencies/businesses in reducing wildlife crime and enhancing conservation.

NWCU will continue to support all Priority Delivery Groups as normal. NWCU will also continue to support all groups which operate under PAW (Marine, Training and Forensics Working Groups) and any other groups who tackle substantial issues of need such as the Non Native Species board.

Focus on tackling the key areas of Cyber-Crime and wildlife crime guidance.

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

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

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

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

National **conservation** priorities

- Priority Delivery Groups continue with NWCU involvement.
- NWCU intelligence requirement¹².
- NWCU investigative support given as a priority¹³.
- PDG will receive NWCU analysis if requested.
- NWCU will continue to identify OCG's.

National **non-conservation** priorities

- Priority Delivery Groups continue with NWCU involvement.
- Focused intelligence collection (quality over quantity).
- PDG will receive NWCU analysis if requested¹⁴.
- NWCU will continue to identify OCG's.

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

¹⁰ Bat Persecution, CITES, FWPM, Raptor Persecution

¹¹ Badger Persecution, Poaching (Deer and Fish Poaching and Hare Coursing)

¹² Except where previously agreed protocol in place to receive *incidents* rather than intelligence - such as with BCT

¹³ Subject to capacity

¹⁴ Hotspot/seasonality analysis can only be provided when *incident* data is supplied, such as that collated by the Badger PDG

Appendix A – Aim and Purpose of Strategic Assessment

Aim and purpose

The Strategic Assessment is a National Intelligence Model product aimed at providing a strategic overview of the threats faced by the UK since the last Strategic Assessment was produced¹⁵. The purpose of this Strategic Assessment is to:

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

Methodology

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

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

Limitations:

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

¹⁵ May 2016

Appendix B – WCCAG

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

UK Statutory Nature Conservation Organisations:

Joint Nature Conservation Committee

Natural England

Scottish Natural Heritage

Department of Agriculture, Environment and Rural Affairs (DAERA NI)

Natural Resources Wales

Other Statutory Agencies:

Animal and Plant Health Agency

Association for Inshore Fisheries and Conservation Authorities

Environment Agency

Royal Botanic Gardens (Kew)

Enforcement Authorities

National Wildlife Crime Unit

Marine Management Organisation

Metropolitan Police Wildlife Crime unit

UK Border Force (CITES Team)

Defra

Relevant Non-Government Organisations:

Bat Conservation Trust

RSPB

TRAFFIC

WWF (on behalf of the Species Survival Network)

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