



Wildlife and
Countryside



WILDLIFE CRIME IN 2017

A report on the scale of wildlife crime
in England and Wales

<https://www.wcl.org.uk/wildlife-crime.asp>

EXECUTIVE SUMMARY

Wildlife and Countryside Link is a coalition of non-governmental organisations (NGOs) concerned with wildlife and landscape protection. As a coalition we are concerned that levels of wildlife crime in England and Wales are not recorded or reported upon in the same manner as in Scotland. The UK governments have identified a number of wildlife crime priorities but are unable to produce information on the prevalence of offending or the location of hotspots. Additionally, trends in criminality cannot be identified.

In this, our second annual wildlife crime report, some of our members have provided information that seeks to provide an overview of wildlife crime in England and Wales. We consider the number of incidents, occurring in 2017 known to each contributor, the number of cases referred to the police, and the number of prosecutions and convictions that took place in that year. We consider what might be driving offending in such areas and identify highlights and disappointments. The use of the internet to commit or facilitate wildlife crime is identified as a problem of particular concern.

In many of the areas we report upon we find similar issues being identified. This report makes a number of recommendations that will address those problems.

CONTENTS

Introduction	1
Wildlife crime report 2016 – revisited	2
Amphibian and Reptile Crime	3
Badger Crime	5
Bat Crime	8
Fisheries crime	11
Illegal Wildlife Trade	13
Marine Mammal Crime	16
Raptor Crime	18
The Trapping of Wild Birds	22
Conclusions and Recommendations	24

INTRODUCTION

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 49 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

In 2011, provisions of the Wildlife and Natural Environment (Scotland) Act amended the Wildlife and Countryside Act and placed a duty on Scottish ministers to produce an annual wildlife crime report. The first such report covered offences reported in 2012.

Elsewhere in the United Kingdom, there are no statutory obligations to produce an annual wildlife crime report with little apparent appetite from authorities to produce one. Given the complications associated with the recording of wildlife crime it is difficult, at present, to envisage how the police, statutory nature conservation organisations, or government might produce such a report. The recording of wildlife crime has been the subject of a separate report from Link.¹

In 2002, the Joint Nature Conservation Committee at the request of the police identified wildlife crime conservation priorities based on the species where conservation status is being affected, in part, by illegal activity. The current priorities are bats, freshwater pearl mussels, raptor persecution and the illegal trade in endangered species and these priorities are reviewed biannually. Further to this, the National Wildlife Crime Unit has identified, on the basis of intelligence analysis, badger persecution and poaching (in particular poaching of deer, fish and hare) as police wildlife crime priorities.

Some NGOs produce annual crime reports relating to their specific area of interest. RSPB has for many years produced an annual Bird crime report and Bat Conservation Trust produces a report on Bat crime.

In the absence of an official wildlife crime report produced by statutory authorities, Link members have produced this report on wildlife crime that came to our notice in 2017. This is the second such report and it remains our intention to produce them towards the end of every year.

This report focusses, in the main, on wildlife crime where the investigative responsibility falls to the police and, in relation to the illegal trade in endangered species where offences under the Customs and Excise Management Act are identified, Border Force. However, there are other agencies and organisations which have an enforcement role. This report does not purport to provide a complete overview of wildlife crime in the UK. There are other types of wildlife crime, such as hare coursing, that are addressed by organisations who are not members of Wildlife and Countryside Link. This report includes contributions in relation to some types of wildlife crime that were not included in the 2016 edition. We hope that in future years the scope might be further expanded. This report relates only to England and Wales.

The following sections include data on: amphibian crime, badger crime, bat crime, fisheries crime, illegal wildlife trade, marine mammal crime, raptor persecution, reptile crime and trapping of wild birds. Information used to produce this report comes from data gathered by conservation NGOs therefore it is unlikely to encompass the full extent of wildlife crime in England and Wales. For each section, we detail the legislation and species involved, the possible drivers of the crime, the extent of recorded crime,² where known recent challenges and highlights with enforcing/prosecuting offences, and recommendations going forward.

ANNUAL WILDLIFE CRIME REPORT 2016 REVISITED

Our first report released earlier this year covering crimes reported in 2016 received a great deal of interest from media, conservationists, enforcers, prosecutors and the public generally. We are very pleased to report that there has already been some progress towards implementation of our recommendations :

- The National Police Chiefs Council and the Association of Police and Crime Commissioners have adopted a wildlife crime strategy.³ The objectives identified within that document address many of the recommendations in our report. The need to extend the recording of wildlife crime is acknowledged, as is a desire to introduce partnership-working agreements. How these objectives are to be attained is to be set out in a yet-to-be published delivery plan.
- At a meeting with Victoria Atkins MP, Minister for Crime, Safeguarding and Vulnerability, and Home Office officials, we were able to present our case for the recording of wildlife crime.
- The Sentencing Council has recently consulted on guidance for a range of offences where guidance is required. Wildlife crime is specifically identified as an area to be included in such guidance.
- The parliamentary Environment, Food and Rural Affairs Select Committee, in considering the draft Animal Welfare (Sentencing and Recognition of Sentience) Bill 2017, has recommended an increase in available sentences for offences relating to animal welfare other than those contained in the Animal Welfare Act 2006.⁴
- The Crown Prosecution Service, at a meeting of its Community Involvement Panel, identified the value of the existing network of specialist prosecutors and recognised some areas of evidential uncertainty that they will look to provide guidance on.



AMPHIBIANS AND REPTILES

Species and legislation

England and Wales have 13 native species of terrestrial amphibians and reptiles along with a number of non-native species. The level of legal protection differs widely. Some such as the great crested newt and sand lizard receive a high degree of protection afforded by the criminal law. Legal protection for those species includes the prohibition of capture and disturbance, and protection of breeding sites and resting places. Widespread reptiles are protected from intentional killing and injuring, whilst the remainder, from a conservation perspective, are not protected save for controls on trade. Animal welfare legislation will in certain circumstances be relevant for all species, native or non-native.

Protection is provided by the Conservation of Habitats & Species Regulations 2017, and/or the Wildlife and Countryside Act 1981 (as amended). In some circumstances the Animal Welfare Act 2006 can apply.

Drivers

Amphibians and reptiles are occasionally subject to persecution. Adders in particular have been known to have been deliberately killed, due to prejudice or misplaced fear about their bite. Grass snakes and slow-worms are sometimes targeted because they may be confused with adders. Animals are sometimes killed during conservation management, but this is not intentional and is often unavoidable. Anecdotal evidence is clear in demonstrating that offences are most likely to be committed by those developing land.

Even where works on land requires planning permission, legislation and planning procedures do not always result in the submission of ecological surveys and reports relating to amphibians and reptiles. There appears to be a commonly held view amongst a minority in the construction industry that if they offend there is a low risk of being brought to justice, and even if this were to occur penalties are likely to be less than the costs of following lawful process.

Extent of recorded crime

Year	Number of incidents recorded	Number of probable cases of criminal offending	Number of cases referred to the police	Number of cases where criminal offending confirmed	Number of cases and charges prosecuted	Number of defendants prosecuted	Number of defendants convicted
2017	15	N/K	15	6	0	0	0

Recent disappointments

Amphibian and Reptile Conservation (ARC) staff and supporters have provided information suggesting that the commission of activities that constitute criminal offences against amphibians and reptiles is rather common. But a database detailing such allegations has not, until recently, been kept. Nationally, it is not known how many allegations of offences are made to the police, how they have been dealt with or the outcomes of investigations or even prosecutions. Since 2017, ARC has been soliciting data and passing them on to the Bat Conservation Trust (BCT)'s "Bearing Witness for Wildlife" project, but it is likely that many more allegations remain unrecorded. It is concerning that although some of these species are highly protected the government cannot report on the level of crime affecting them.

The evidential test for offences under the main relevant legislation is set very high. Evidencing that offences have been committed is very difficult, requiring investigative skills and access to ecological expertise. Where matters are reported to the police, investigations are often hampered because investigating officers are not sufficiently well informed to undertake, without assistance, effective investigations. In some cases, questionable decisions have been made by police forces and or Crown Prosecution Service leading to cases being timed out or not pursued with sufficient direction.

Recent highlights

During 2017, ARC has been working with the BCT's "Bearing Witness for Wildlife" project to extend the work of its investigations officer to allegations of offences relating to amphibians and reptiles. This has involved increased engagement in reporting allegations, assisting police with investigations, training for ARC staff, enhanced monitoring and enquiries and social media traffic, and delivery of a workshop for the amphibian and reptile conservation community.

We are now able to record the number of cases that we know have been reported to the police, to monitor the progress of those cases and to provide guidance and assistance where it might be needed to investigators and Crown Prosecution Service prosecutors. During 2017, we produced our first conservation impact statement that can be used in cases where offences against great crested newts can be identified. A small number of cases, first reported to the police in 2017, are still active. Compelling allegations of unlawful activity include deliberate killing of adders in a park in Essex, discovered via social media and reported to the police. It seems likely that in 2018 there will be at least one prosecution resulting from engagement by ARC staff and the Bearing Witness for Wildlife project.

Matters to be addressed

- The police to record allegations of offences against amphibians and reptiles in a manner that allows for statistics to be made publicly available.
- Police forces to identify resources capable of undertaking effective investigations into wildlife crime, including use of specialist advice.
- Crown Prosecution Service to increase training so that all areas have access to prosecutors with experience in wildlife cases.
- ARC and others to promote awareness of the procedures for reporting allegations and to encourage this to happen promptly.
- Review of case disposal options and sentencing.



BADGER CRIME

Species and legislation

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

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

Badger Crime is a UK Wildlife Crime Priority because of sheer persecution as opposed to conservation.

Drivers

The number of recorded incidents of illegal persecution against the badger probably make it one of the most demonised protected species in England and Wales. The badger is arguably persecuted by a wider cross section of society than any other species, through sett interference, badger baiting, shooting, snaring and trapping, poisoning, and hunting and lamping badgers with dogs. Offenders may include those involved in agriculture, forestry, development, householders, registered hunts and badger baiters.

Obtaining evidence that the licensed culls of badgers and the accompanying publicity has resulted in a rise in illegal persecution is difficult. However, reports of badger setts being blocked within cull zones have increased in those areas and thus the opportunity to discover and report these crimes has been raised, that previously may have gone undiscovered and unreported.

Extent of recorded crime

The Badger Persecution Priority Delivery Group (BPPDG) records incidents of badger persecution in England and Wales, where a minimum of 99 incidents were reported to police forces in 2017 (see tables 1-3 for further information). The number of incidents referred to the police is not recorded by every organisation submitting information.

The main areas of criminal threat remain badger baiting and sett interference.

2017 saw only one case in Cambridgeshire where a person was cautioned for interference with a badger sett, under Section 3 of the Protection of Badgers Act 1992. A number of other badger cases were adjourned for hearing in 2018.

Recent challenges

Most incidents of badger crime that are referred to the police for investigation are dealt with effectively, but sometimes the level of investigation fails to reach an expected reasonable standard.

Examples are where police control rooms fail to recognise the complaint as a police matter, referring it to the RSPCA, or secondly where the complaint is accepted, officers often have no power or training to undertake investigations and basic procedural failures ensue, which include crime scenes not being examined to prove the badger sett was in current use or forensic evidence is lost. The continual pressure on police resources does not assist.

The lack of available and rapid access to competent or expert witnesses is problematic.

Court Cases are often heavily contested by defence specialists, ranging from barristers to solicitors,

Table 1

Year	Number of incidents recorded	Number of probable cases of criminal offending	Number of cases referred to the police	Number of cases where criminal offending confirmed	Number of cases and charges prosecuted	Number of defendants prosecuted	Number of defendants convicted
2016	612	N/K	92	N/K	5	N/K	N/K
2017	740	N/K	99	N/K	0/0	0	0

Table 2

Type of Incident	Number of reports	%	% Change from 2016	Comment
Sett Interference	363	49.1	+ 45.8	See table 3 for sub-categories
Baiting/Fighting	73	9.9	- 43.8	39 reports related to intelligence on BB
Poisoning	34	4.6	+ 36.0	
Traps/Snares	41	5.5	- 14.6	
Trading	1	0.1	0.0	
Shooting	18	2.4	- 48.6	
Hunting Dogs/Lamps	18	2.4	- 10.0	
Other	180	24.4	+ 106.9	
Non-Criminal	12	1.6	- 29.4	
Total Incidents	740		+ 20.9	

Table 3: "Sett Interference" sub-categorised

Type of Sett Interference	Number of reports	%	% Change from 2016	Comment
Agricultural	25	6.9	+ 108	Type of offender or reason not known
Blocking	65	17.9	+ 22.6	
Damage Destroy	35	9.6	+ 84.2	Commercial Private
Development	55	15.1	+ 30.9	
Disturbance	13	3.7	- 31.5	
Forestry	14	3.9	+ 366.6	
Hunt	102	28.0	+ 61.9	Insufficient to confirm baiting/fighting
Sett Dug	54	14.9	+48.6	
Other	10	0.0	- 100	
Total Incidents	363		+ 45.7	

with duty Crown Prosecution Service (CPS) lawyers having little or no knowledge of wildlife crime. The attendance of a specialist prosecutor at the first hearing onwards is rare.

Commercial development cases are possibly committed in the knowledge that evidential requirements are such that there is low risk of prosecution in comparison to high financial gain.

During 2017, as a consequence of change within the Badger Trust, there was a significant reduction in the number of intelligence submissions relating to badger persecution made to the NWCUC.

Recent highlights

In joint partnership, the Badger Trust and Naturewatch Foundation in 2017 conducted badger crime training workshops with eighteen police forces across England and Wales.

In 2017, the BPPDG produced an advice note on covert surveillance and the use of expert witnesses, which was circulated to BPPDG members, badger groups and the police service in England and Wales.

The BPPDG set three-year targets in relation to Prevention, Intelligence and Enforcement, and introduced yearly analytical reports to highlight crime hot spots in coloration to methodology, locational and seasonal variations in England and Wales.

Wildlife and Countryside Link produced “The Recording of Wildlife Crime in England and Wales” report in November 2017, which included illegal badger persecution and a call for all wildlife crime to be made recordable.

Matters to be addressed

Offences and incidents need to be recorded in a consistent manner by statutory agencies, in order to provide consistent statistics for appropriate analysis, identify trends and resource allocation.

Police forces need to identify resources and increase their capability to investigate allegations of offences effectively. Likewise, they should be provided with the resources needed to gather intelligence relating to wildlife crime from the internet.

The availability of competent or expert witness, whether ecologists from statutory agencies or alternative people with suitable knowledge, skill and experience, needs to be improved.

The CPS needs to consider how badger cases are presented throughout the entire court process, including trials and sentencing hearings.

A sentencing guideline is urgently needed for offences relating to badgers.

BAT CRIME

Species and legislation

England and Wales host 18 species of bats. All are protected against killing, injuring, harm and disturbance. Their breeding and resting places (roosts) are protected against damage and destruction even when the animals are not present.

Some populations of some species of bats have, in recent years, increased. Whilst this is welcome news, populations do however remain far below historic levels. Protection is provided primarily by the Conservation of Habitats & Species Regulations 2017, additional protection is provided by the Wildlife and Countryside Act 1981 (as amended) and, in some circumstances by the Animal Welfare Act 2006.

Drivers

Commercial development of property can easily be identified as the primary driver for those who commit bat related crime. A failure to properly plan for the processes involved in obtaining a licence allowing for the destruction of a bat roost is often found to be the root cause of offending. On occasion offending can be shown to be planned and intentional. On a number of occasions, forged or altered ecological reports have been submitted in support of planning applications. There is a view held by a minority in the industry that there is a low risk of being brought to justice and, even if this were to occur, penalties are often less than the costs of following lawful process. Other commonly identified areas of criminal offending relate to property maintenance and the felling or management of trees.

Extent of recorded crime

Year	Number of incidents recorded	Number of probable cases of criminal offending	Number of cases referred to the police	Number of cases where criminal offending confirmed	Number of cases and charges prosecuted	Number of defendants prosecuted	Number of defendants convicted
2016	145	N/K	145	32	1/1	1	1
2017	195	N/K	165	34	3/6	5	5

Recent challenges

Whilst most incidents of bat crime referred to the police are dealt with in an effective manner, and some are dealt with exceptionally well, there are a small number of incidents where investigations have not reached the standards that might reasonably be expected. The number of such cases does seem to be increasing as pressure on police resources intensifies. Common causes of complaint are failures to accept ownership of allegations, investigations being allocated to officers without the power or training to undertake investigations and basic procedural failures. In 2017, we saw a significant rise in the number of cases where it proved impossible to establish the outcome of allegations made to the police.

Very few prosecutions of bat crime are heard by the courts. Those that are prosecuted invariably result in conviction but once again, in 2017, the sanctions imposed have been less than the financial gain made by not following due process. This is particularly apparent in cases where offenders plead guilty at the first opportunity.

Recent highlights

The commitment and expertise of many of those involved in the prevention, investigation and prosecution of bat crime is often inspirational. Annually many offences are prevented through the early intervention of the police providing advice to those who, it seems, might be in danger of committing criminal offences. The use, in appropriate cases, of restorative justice measures is welcomed, often bringing conservation



benefit to bats that would otherwise not have been available. There is evidence that investigating officers are becoming more aware of this with the number of cases being dealt with by such means increasing in recent years. At the other end of the spectrum, the use of Proceeds of Crime legislation against developers convicted of bat related offences is to be applauded, as is the willingness of investigators and prosecutors to consider such applications in other cases. There have been two cases investigated by the police during 2017 that have resulted in Proceeds of Crime Act confiscation orders being imposed at trials held in 2018.

Matters to be addressed

- Offences to be recorded in a manner that makes statistics available.
- Police forces to identify resources capable of undertaking effective investigations into wildlife crime.
- CPS to consider how difficulties encountered in the prosecution of wildlife crime cases, where offenders plead guilty at first hearing might be addressed.
- A sentencing guideline for wildlife crime.

CASE STUDY

Convictions for bat crime at Leamington Spa Magistrates Court

4 May 2017

On Tuesday 11th April 2017, Magistrates sitting at Leamington Spa Court heard a case relating to the destruction of a bat roost. In passing sentence, in the opinion of the Bat Conservation Trust, they did great disservice to bat conservation and the wider fight against wildlife crime.

The owner of the property in question and a builder contracted to renovate the property both pleaded guilty to the offence and were fined just £83 and £153 respectively. Both were ordered to pay £135 costs and a £30 victim surcharge.

The property in question was a bungalow and barn that were to be demolished and replaced by a new dwelling. There was a lengthy planning history relating to the site and survey work undertaken over a period of years identified and confirmed roosts of brown long eared and soprano pipistrelle bats.

The owner of the property was advised on a number of occasions that he would need to obtain a licence from Natural England and would have to provide a bat house to which the bats could relocate. Despite this advice, it seems that he decided to commence works during the spring of 2016 and asked an ecologist to obtain the required licence. When told that further survey work would be needed before a licence would be considered, he asked what the penalties for destroying a roost without a licence were, and indicated that he would be prepared to accept a fine. It was later found that the buildings had been demolished and the roosts destroyed. The matter was reported to the police.

Following a lengthy police investigation, papers were submitted to the Crown Prosecution Service and were considered by a specialist prosecutor who decided that matters should be prosecuted. The case was first listed for the 11th April with both defendants pleading guilty at the earliest opportunity.

The CPS specialist prosecutor did not attend court to prosecute this case in person. Instead the prosecution was undertaken by a lawyer who appeared to have little understanding of the conservation impact of the offending, the financial benefit gained by not following lawful process (the costs of further survey work, obtaining a licence and ecological supervision of the work) or the size of fines imposed in other cases of roost destruction. In March 2016, a judge passing sentence on a bat crime in Derbyshire fined an offender £3000 at the same time commenting that the nature of the offence was at the lesser end of a scale of offending. Those comments were not made available to the magistrates sitting in Leamington Spa.

In contrast, the defence had a well-prepared and well-presented case that suggested that the offending was no more than administrative oversight. That when the buildings had been demolished the roof had been stripped by hand with no bats having been found. Furthermore a bat house as envisaged by ecologists had also been provided. (No mention was made that the demolition seems to have taken place at a time when bats would have been present or that the bat house that had been provided was not fit for purpose.) In drawing the defence case to a close a letter of mitigation, said to be from an ecologist, was submitted to the court.

We can only surmise that the magistrates who heard this case were swayed by the arguments put forward by the defence. But even so, how did they decide to fine the owner of the property only 25% of his declared weekly income? Recent sentencing guidance would have allowed a fine of up to a maximum of 650% of weekly income and legislation allows the imposition of unlimited fines. Indeed 25% of weekly income is the minimum fine that the guidance suggests can be imposed.

FISHERIES CRIME

Species and legislation

The Fisheries Enforcement Support Service (FESS) is funded by the Environment Agency (EA) from freshwater coarse and non-migratory fishing licences in England, and is a formal partnership, delivered under contract, between the EA and Angling Trust, the sport's governing body. The EA is the statutory lead on fisheries enforcement in England (Natural Resources Wales is the responsible Welsh body). Given the funding from freshwater licences, the FESS is not currently involved with marine enforcement.

Protection is largely provided by the Theft Act 1968, and Salmon & Freshwater Fisheries Act 1975.

Drivers

The large profit margin offset against low sentences is the driver for organised crime gangs illegally importing carp from the continent for sale to sport fisheries, and which orchestrate the theft and illegal sale of such high value fish from English commercial sport fisheries.

Another driver is the cultural difference between migrant anglers from eastern and central Europe, who take fish for the pot, and our own conservation-based 'catch and return' approach. This has led to many problems between both communities, generating not only fisheries but also hate crime.

A further issue is that offenders fishing without permission or rod licences fail to contribute to the maintenance and improvement of fisheries – impacting on small businesses.

Extent of recorded crime

Frustratingly, this remains unknown. Although fishing without permission is a recordable and notifiable crime under Schedule 1, Theft Act 1968, in our experience, following annual Freedom of Information requests to all forces, the police remain inconsistent in recording these offences. Moreover, there remains a lack of appreciation that theft of fish is not a victimless crime, and that this is financially quantifiable. Given this inconsistent approach to recording fisheries related crime, and lack of a central facility to capture this data, it remains impossible to quantify. Moreover, because confidence throughout the angling community has been so low, a substantial number of offences have demonstrably gone unreported.

Recent challenges

Through our work to educate the angling community regarding how the intelligence-led enforcement system works, emphasising the need to report incidents and information, such calls are increasing annually. The majority of police forces are now subscribed to either Operations TRAVERSE (covering the eastern half of England) or LEVIATHAN (western half of England and all of Wales), but because the number of cases brought remains comparatively low, forces demonstrate an inconsistent quality of service delivery. At a time when positive publicity is so important to continue raising awareness and increasing confidence, examples of inappropriate service undermine the entire process – especially when shared on social media.

Recent highlights

The FESS is essentially a task force of retired police officers, working in support of and in partnership with the Environment Agency. The six regional enforcement managers run the 500 strong Voluntary Bailiff Service throughout England (which is trained in partnership with the Environment Agency and police to report incidents and information to a high evidential standard), provide training to the police and other partners, and coordinate Operations TRAVERSE and LEVIATHAN. The FESS's National Intelligence Manager processes the incoming information, sharing logs with partners as appropriate. The strategy also includes the Building Bridges Project, engaging with migrant communities, providing multi-lingual information, working on education and integration. The FESS also runs Fisheries Enforcement

Workshops, again in partnership with the police and Environment Agency, throughout England, providing essential free training for the angling community. Moreover, the FESS works closely with the Magistrates' Association and CPS, contributing Impact Statements and training – leading to an increase in appropriate sentencing. Overall, the enthusiastic cooperation of the police has been refreshing – it being increasingly understood that this is not simply about 'a few wet fish' but more accurately rural, wildlife, organised, business and hate crime – and another entry point, therefore, for engaging with intelligence and criminality.

Matters to be addressed

- Consistency must be achieved regarding recording of fisheries crime.
- Awareness must be raised on an ongoing basis regarding the actual impact of and facts concerning fisheries related crime.
- Consistency is also required regarding sentencing and the processing of cases.
- Intelligence must be acted upon by our empowered partners.



Members of the VBS during a joint Operation LEVIATHAN patrol in 2017 with the Environment Agency and Warwickshire Police.



Members of the FESS, VBS, Environment Agency and Nottinghamshire Police during an Operation TRAVESE patrol of the River Trent in 2017.

ILLEGAL WILDLIFE TRADE

Species and legislation

The illegal wildlife trade threatens some of the world’s most iconic animals and plants. United Nations seizure data show that almost 7,000 species were affected worldwide in 2016. The UK is implicated as both a transit and destination country for trade in illegal wildlife products, as well as being a source country in some cases (e.g. live raptors for the falconry trade).

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.

It is the responsibility of individual governments to implement the Convention and in the UK, Defra is the Management Authority for CITES. CITES is implemented in the UK via the EU Wildlife Trade Regulations, and the UK’s own implementing regulations (Control of Trade in Endangered Species - COTES). Defra is advised on plant matters by the Royal Botanic Gardens, Kew (RBG Kew) and on animal matters by the Joint Nature Conservation Committee (JNCC), which together constitute the CITES Scientific Authorities. The Animal and Plant Health Agency (APHA, an executive agency of Defra) is responsible for providing policy advice to the government on CITES and wildlife enforcement issues. It is also responsible for issuing import, export and sale licences for plants and animals listed on the appendices of CITES and the annexes to the EU Wildlife Trade Regulations.

The police have primary responsibility for enforcing the provisions of COTES. UK Border Force (UKBF) has primary responsibility for enforcing the Customs and Excise Management Act 1979 (CEMA) and, in particular, the offences relating to imports and exports of wildlife contrary to the provisions of CEMA and the EU Wildlife Trade Regulations.

Drivers

The demand for live species and wildlife products ultimately drives wildlife trafficking offences. Wild animals, such as tortoises, owls and primates, are desired by some members of the public for pets, which drives illegal imports into the UK. Some live wild animals are also illegally sent abroad, such as European eels, for the booming global illegal trade in eels for food.

Wildlife products, such as mounted animals, wild plants, traditional medicine products and ornaments made from wildlife parts such as ivory, are desired by some individuals in the UK. The money that can be made by selling these goods to UK-based or overseas buyers drives criminal involvement, and wildlife trafficking increasingly involves organised criminal groups operating across multiple jurisdictions. Lack of awareness of legislation also leads some individuals to unknowingly sell, purchase, import or export illegal goods without the correct permits, for example tourists bringing illegal wildlife products, such as coral or rosewood, back from holiday.

Extent of recorded crime

Year	Number of incidents recorded	Number of probable cases of criminal offending	Number of cases referred to the police	Number of cases where criminal offending confirmed	Number of cases and charges prosecuted	Number of defendants prosecuted	Number of defendants convicted
2016	N/K	N/K	N/K	N/K	16/NK	16	16
2017	N/K	N/K	N/K	N/K	4/14	4	4

Recent challenges.

A fundamental issue to understanding the scale, scope and character of illegal wildlife trade in the UK remains the lack of available data and records. Furthermore this impedes the ability of the government and national agencies to direct resources to effectively address IWT, measure impact and track trends. Current methods to monitor, record and quantify confirmed crimes are inadequate and ineffective and this needs to be addressed so that a true picture of the level of IWT is known.

In 2017, we are only aware of four CITES prosecution cases in the UK, which is lower than previous years. Without the research, we do not know the reasons behind the drop in number of CITES cases coming to court.

In 2017, an announcement of the update of the COTES regulations was still imminent. However, at the time of writing, COTES Regulations 2018 have now come into force on 1 October 2018.⁵ The revised Regulations may require further revision to reflect the UK's departure from the European Union in 2019, and the transposition of the EU Wildlife Trade Regulations into UK legislation through a Statutory Instrument.

Recent highlights

A notable prosecution from 2017 was the conviction of a man who tried to sell endangered animal parts from the UK, including rhino horns, elephant tusks and hippo teeth. The individual was sentenced to 14 months in jail after the illegal products were discovered by specially trained search dogs in a police raid.

During 2017, many wildlife crime police officers received training aimed at increasing officers' skills and awareness in dealing with the illegal trade in endangered species. Facilitators of the training events included the National Wildlife Crime Unit, Joint Nature Conservation Committee and Animal and Plant Health Agency.

In October 2017, the UK government launched a public consultation on banning UK sales of ivory. The 12-week consultation received more than 70,000 responses from the public, with 88% backing the ban. In April 2018, the government announced its intention to introduce a strict ivory ban, with limited exemptions for items containing less than 10% ivory made before 1947 and instruments containing less than 20% ivory made before 1975. There will also be limited exemptions for accredited museums and for rare or important items more than 100 years old.

In October 2018, the UK government hosted the London Conference on Illegal Wildlife Trade, building on previous state-led conferences in London in 2014, Kasane in 2015 and Hanoi in 2016. The 2018 conference focussed on tackling IWT as a serious organised crime, building coalitions and closing markets.

Matters to be addressed

- Recording of all wildlife crime, including CITES offences
- Investigation into why there has been a drop in the number of CITES cases coming to court and how this can be improved
- Raising awareness among the general public of what wildlife products are illegal
- Introduction of sentencing guidelines for wildlife crimes. (In September 2018, Link members responded with information about wildlife crime to the Sentencing Council's consultation on a general sentencing guideline for offences not covered by specific guidance)
- Additional resources and emphasis on tackling the increasing role of the internet and cybercrime in facilitating illegal wildlife trade
- More public-private partnerships to collectively tackle IWT
- Dedicated wildlife crime police officers in each force
- Continued provision of training to law enforcement agencies on addressing wildlife crime with particular reference to cybercrime and any enforcement changes around ivory regulations.
- A re-evaluation of the resourcing of key agencies including the National Wildlife Crime Unit and Border Force CITES Team, in order to ensure these key agencies are adequately funded in the long term so as to be able to continue to deliver the key roles they provide in responding to illegal wildlife trade.



MARINE MAMMAL CRIME

Species and legislation

Around 27 species of cetaceans live seasonally or year-round in English and Welsh waters, as well as grey and harbour seals. Cetaceans are offered strict protection under Habitats Directive Article 12, which is transposed into national law under the Conservation of Habitats & Species Regulations 2010 (updated 2017) and the Wildlife and Countryside Act 1981 (as amended). It is an offence (subject to exceptions) to deliberately capture, kill, or disturb cetaceans. Seals enjoy the protection afforded by the Conservation of Seals Act 1970. In some circumstances, cruelty to wild mammals is an offence under the Wild Mammals (Protection) Act 1996.

Drivers

Recreational and commercial tourism can be a driver for potential crimes against marine mammals. Individuals can approach marine mammals by either getting in the water with them and behaving inappropriately or approaching them inappropriately from any water craft or vessel.

In the UK, there is a perceived conflict with some fisheries, particularly of seals taking commercial or protected fish species.⁶ There is evidence of cruelty through the illegal injuring or killing of seals with guns and other weapons.⁷ Since 2011, Scotland has required that seals can only be taken under licence; this change in legislation has not been mirrored in England and Wales.

Extent of recorded crime

Year	Number of incidents recorded	Number of probable cases of criminal offending	Number of cases referred to the police	Number of cases where criminal offending confirmed	Number of cases and charges prosecuted	Number of defendants prosecuted	Number of defendants convicted
2016*	216	3	3	N/K	0	0	0
2017*	136	12	4	N/K	0	0	0

* FOOTNOTE: These figures represent calls made to the Cornwall Marine and Coastal Code Group hotline. They give an indication of reports of marine mammal disturbance in Cornwall rather than an exhaustive list of marine mammal crime. As we are using a different dataset in 2017, we have revised the 2016 figure accordingly to make the figures comparable.

Crime trends

Successful marine mammal prosecutions and convictions are rare, so it is difficult to detect a trend. While the number of recorded incidents tends to be high, very few of these cases are referred to the police. The reason for this is unclear, but it may be because the public do not consider that the police deal with such incidences. Reporting is influenced by traditional and social media, and public engagement with marine wildlife issues, as well as the actual number of wildlife crime incidences. The data here, for Cornwall only from the Cornwall Marine and Coastal Code Group (CMCCG), show a drop in recorded incidents from 2016 to 2017. We cannot define the cause of this decrease, but it is thought to be an inter-annual fluctuation rather than a downward trend.

Recent challenges

Reported cases rarely lead to prosecution. It is essential to get an incident logged with the police, since, even if nothing comes of it, it is important to show the incident is in the system and that wildlife crime exists. This will help enable us to better understand the extent and trends over time.

Recent highlights

The recent perceived increase in disturbance cases has led to the issue having more of a public profile on social media and in the media. This has led to a focus on this issue from the statutory agencies, including the development of a code of conduct.

- Wildlife crime officers have become very supportive of this work.
- Wildlife crime officers have highlighted the importance of getting incidents logged via 101, even if nothing comes of it. Previously, individuals were engaging with interested police officers directly, but this meant many incidents were not officially logged.

Cornwall is leading the way nationally, with the formation of a regional stakeholder group to tackle the issue of marine wildlife disturbance by recreational water users. The Cornwall Marine and Coastal Code Group, formed in 2013, aims to:

- increase awareness of marine and coastal wildlife disturbance issues, laws and voluntary codes of conduct.
- provide an informal forum of experts, regulators and major conservation landowners to advise on the best course of action following serious or repeat marine wildlife disturbance incidences in Cornwall.
- develop relevant resources, projects and training programmes for partner organisations, users, operators and other interested parties.
- formulate action or joint position statements where specific issues are highlighted.
- input, monitor and review the Marine Wildlife Disturbance Register.
- agree an action plan for the group.

Membership of the Cornwall Marine and Coastal Code Group is open to any organisation involved in the conservation, protection and management of marine and coastal biodiversity, either substantially or wholly in Cornwall, and which is also a member of the Cornwall Marine Liaison Group.

The UK's national training scheme for minimising disturbance to marine wildlife (WiSe)⁸ seeks to minimise marine disturbance through delivering training to vessel operators and to other key organisations, including the police. Such training can help individuals to understand disturbance legally and biologically, with the aim to ensure safe and responsible marine wildlife watching.

Matters to be addressed

- Raising public awareness of the existing marine mammal protections and what good behaviour is, plus how they can gather the evidence required to report incidents (photographic and video footage).
- Development of a Wildlife Crime App (like that produced by Partnership for Action against Wildlife crime in Scotland) and other guidance for reporting adequate details of marine mammal wildlife crime.
- Police awareness and ability to deal with marine wildlife crime needs to be maintained and improved, including among wildlife crime officers.
- Ensure wildlife crime officers are linked with any regional efforts, an example being ensuring engagement with the membership of the Cornwall Marine and Coastal Code Group.
- Continue to provide the opportunity for police to undertake regular WiSe training.
- Offences to be recorded in a manner that makes statistics available for appropriate analysis, in order to identify trends and inform resource allocation.
- Ease of access to crime data on a transparent website.

RAPTOR PERSECUTION

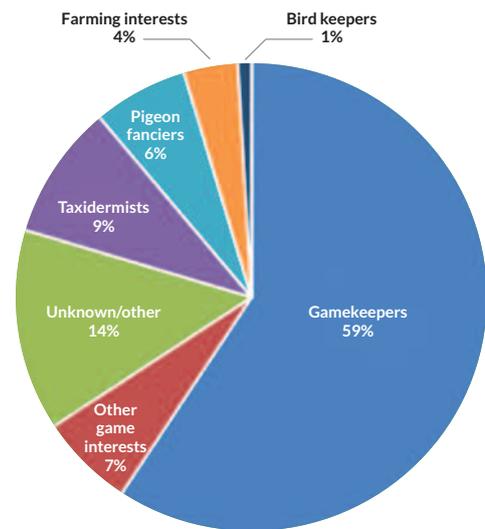
Species and legislation

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

Drivers

Scientific monitoring of raptor populations, supported by wildlife crime data and intelligence continues to show the key driver of raptor persecution is the conflict with land managed for game bird shooting. Raptors are deliberately targeted to reduce potential predation on game bird stocks. In particular, there is concern about land managed for driven grouse shooting and conservation impacts on species like golden eagle and hen harrier. In May 2018, a scientific paper *Raptor persecution in the Peak District National Park* was published in the journal *British Birds*. The results demonstrate strong associations between intensive grouse-moor management, the persecution of raptors and declining populations of both goshawks and peregrines in the Peak District National Park.

The adjacent pie chart shows the occupations/interests of the 108 individuals convicted in England and Wales of bird of prey persecution-related offences 1990-2017. Note that there were no bird of prey persecution related convictions in 2017 (or indeed in the two years prior).



The occupations/interests of the 108 individuals convicted in England and Wales of bird of prey persecution-related offences 1990-2017

Extent of recorded crime

Raptor persecution in England and Wales

Year	Number of incidents recorded/ reported*	Number of probable* cases of criminal offending	Number of cases referred to the police	Number of cases where criminal offending confirmed	Number of cases and charges prosecuted	Number of defendants prosecuted	Number of defendants convicted
2016	156	16	Most (see below)	67	0	0	0
2017	197	48	Most (see below)	58	0	0	0

Some incidents are passed to the RSPB retrospectively for its records, and not all will have a police reference number, especially if they have been dealt with by enforcement partners e.g. RSPCA (welfare offences) or Natural England (poisoning incidents). Therefore, though most incidents are passed to the police, it is not possible to determine this number precisely. Information which has intelligence value (which will include a number of the 'unconfirmed' and 'probable' incidents) will be disseminated as an intelligence report to relevant police force along with appropriate enforcement partner including NWCURSPCA as appropriate.

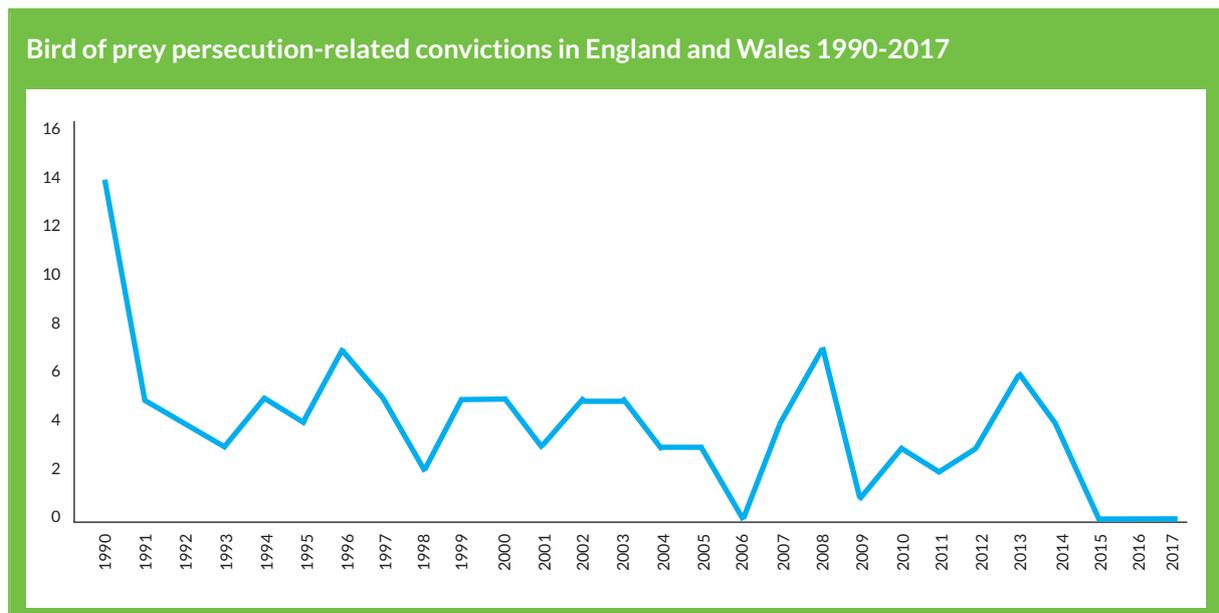
England and Wales raptor persecution 2017 – split into incident types

Raptor persecution Incident type	Number of confirmed incidents
Shooting	42
Poisoning	8
Illegal Pole/Spring Trapping	1
Illegal Trapping (Other)	2
Nest Destruction	2
Persecution Other	3
Total	58

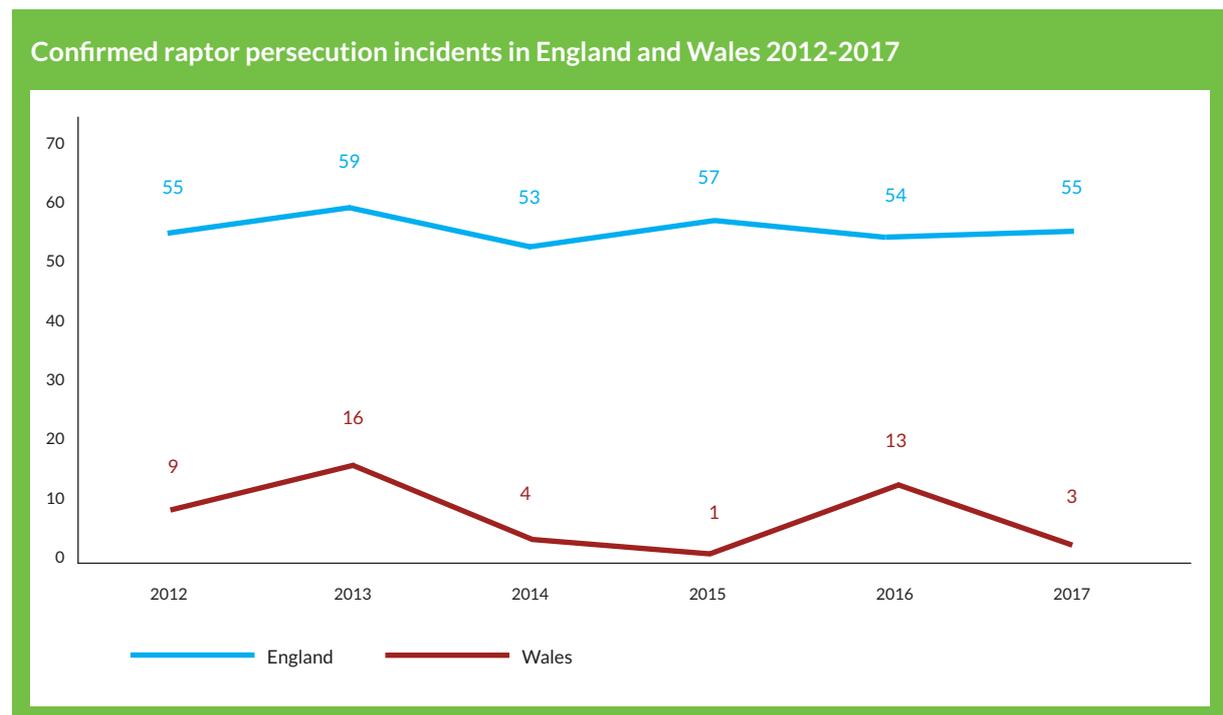
The detection rate of confirmed incidents is believed to be a small fraction of those actually being committed. Shooting continues to be the most detected type of bird of prey persecution. For detailed maps showing location of incident types per country, see the RSPB Raptor Persecution Map Hub.

Recent challenges

There were no convictions for raptor persecution in 2017, echoing the worrying trend from the previous two years (See below)



The risk of being caught and prosecuted remains very low. This is despite raptor persecution continuing to be an ongoing issue (see 5-year data below).



A court hearing during March 2018 ruled that RSPB covert surveillance footage was inadmissible. This related to offences recorded at a peregrine nest site on a grouse moor in Lancashire during 2016. The case had excellent support from the police and Crown Prosecution Service (CPS). There were some complex legal arguments relating to the Regulation of Investigatory Powers Act (RIPA), and it is unfortunate that the District Judge was not provided with prepared information which may have had a bearing on the decision. Whilst not legally binding, this decision is unhelpful and may have a bearing on future cases.

The future of the Wildlife Incident Investigation Scheme (WIIS) in England, which monitors wildlife poisoning incidents is currently uncertain. This has been run by Natural England (NE) on behalf of the Health and Safety Executive (HSE), but the operation of the scheme is under review and a final decision on how it will operate is awaited. NE have experienced staff in this area of work and losing this resource could negatively impact on the investigation of wildlife poisoning offences, including raptor persecution pesticide abuse cases.

Recent highlights

In August 2018, RSPB launched the Raptor Persecution Map Hub (www.rspb.org.uk/RaptorMap) – the most complete, centralised set of known confirmed raptor persecution incidents in the UK, to raise awareness and facilitate enforcement. This currently contains data from 2012 to 2017.

Raptor persecution conviction: In April 2017, RSPB investigators witnessed the shooting of two short-eared owls on the Whernside Estate grouse moor. Following a dramatic chase, a local gamekeeper was arrested and later convicted on the 28 August 2018. The defendant pleaded guilty to the shooting of two short-eared owls and possession of a Foxpro electronic calling device contrary to the Wildlife and Countryside Act 1981. He was fined £1000 with £210 costs and victim surcharge. The Foxpro device was forfeited. Partnership working between the police, CPS and RSPB, along with determination and attention to detail, were instrumental in bringing this offender to justice.

In September 2018, Superintendent Nick Lyle, Bedfordshire Police, took on the chair of the England and Wales Raptor Persecution Priority Delivery Group (RPPDG). This group has received criticism for failing to deliver meaningful outcomes. Nick has quickly been making determined efforts to address this, and set up his own blog to improve transparency <https://nicklyallraptorppdg.home.blog/>. In November 2018, he organised a workshop in London to allow RPPDG members, and other conservation organisations, to present ideas for the group to consider.

Matters to be addressed

We are calling on the government to:

- Introduce a system of licensing for driven grouse shooting.
- Protect wildlife law during UK negotiations with the EU
- Make full use of existing powers to clamp down on raptor persecution, and make better use of tools like cross-compliance, ensuring public money is delivering healthy raptor populations.
- Ensure shoot owners and managers can be held accountable for the actions of their gamekeepers by extending the vicarious liability legislation employed in Scotland to the rest of the UK.
- Invest in effective enforcement to uphold the laws protecting iconic wildlife and places.

(See RSPB's latest annual *Birdcrime* report for more details on all of the above)

CASE STUDY

Marsh harrier targeted on grouse moor

Marsh harriers, like hen harriers, are listed on 'Schedule 1' of the Wildlife and Countryside Act 1981. In May 2017, a marsh harrier nesting attempt was recorded at Denton Moor, a driven grouse moor in North Yorkshire. This was highly unusual, since marsh harriers generally prefer low-lying marshland areas.

RSPB Investigations officers installed a covert camera at the nest, which contained five eggs. When they returned, however, the nest was empty. The footage revealed that armed men had visited the site. One is seen removing eggs from the nest. Gunshots can also be heard. It is believed this was a premeditated effort to stop the birds breeding successfully.

Despite enquiries by North Yorkshire Police, it was not possible to positively identify the men.

Read the full story here:

<http://ww2.rspb.org.uk/community/ourwork/b/investigations/archive/2017/08/10/video-footage-shows-failed-marsh-harrier-nest-denton-moor-yorkshire.aspx>



THE TRAPPING OF WILD BIRDS

Species and legislation

The RSPCA investigates and prosecutes the trapping of wild birds. This often involves finches such as the Goldfinch, Greenfinch, Redpoll, Bullfinch or Linnet. However, other species are sometimes taken. The finches are taken to be kept, bred from or sold despite being offered full protection under the Wildlife and Countryside Act 1981.

These birds can be kept if bred in captivity, which can be determined by the closed ring fitted to a bird's legs within the first few days of its life whilst still in the nest. These rings are known as 'closed rings', being a complete ring with no breaks that is slipped over the nestling's leg and cannot be fitted safely to a bird's leg as it becomes older without being tampered with. Many birds have been found in cases where the rings have been tampered with and forced on the legs of older birds which can often result in injuries that cause suffering and pain. Some birds kept in captivity are known as Mule Hybrids. These birds are the result of a cross breed between, for example, a Goldfinch and a Canary. Whilst this trade can go unnoticed, it can go on throughout the country often in discreet and secluded locations such as woodland, hedgerows and scrub land areas.

A number of techniques to take these birds are used, most commonly by using cage traps. These traps are often homemade, even from converted small domestic mammal cages. They consist of one side holding a decoy bird whilst the other compartment is open with a spring-loaded door which closes behind the bird once it lands on the internal perch. They are usually baited as well with commercial finch seed or natural seed heads gathered from the hedgerows. The decoy bird in song can help call wild birds down to the trap.



CASE STUDY

A Search Warrant issued under the Wildlife and Countryside Act 1981 was executed by the police in relation to the illegal trapping and possession of wild birds. They were accompanied by RSPCA Officers from the Special Operations Unit. 12 Goldfinches and a Lesser Redpoll were discovered in a shed. Two bird traps were on the roof of the shed which were baited and in a set position. These birds were considered to be in unlawful possession and seized by the police. It was believed this person had taken them from the wild and he was unable to prove otherwise. Interestingly a witness confirmed the traps had been there for two years and that the person checked them every day by climbing on the roof and removing any wild birds that had been caught in them. A bird expert examined the seized birds and found two were wearing tampered rings and four other birds were wearing tampered rings that had been forced on the bird's legs.

At court this person was found guilty of offences including possession of live wild birds and attempting to take birds from the wild contrary to the Wildlife and Countryside Act 1981. This person was also found guilty under Section 4 of the Animal Welfare Act 2006 in relation to a dog kept at the address. The court imposed penalties of a disqualification for life from keeping all animals, 18 weeks imprisonment suspended for two years, an 18-week curfew and costs of £750.



Mist nets can also be used which can catch a number of birds in a relatively short time period and again are often erected in secluded areas so as not to be noticed. It is illegal to use such mist nets unless you are a trained bird ringer licenced by the British Trust for Ornithology.

Bird lime, which is essentially a sticky glue type substance that doesn't set, can be attached to sticks and twigs baited with seed so that these small finches fly down to the seed and become stuck to this substance, again this is illegal under the Wildlife and Countryside Act 1981.

The RSPCA continues to investigate reports of people trapping and keeping wild birds which can result in a prosecution through the courts. In several cases this can result in a number of birds being taken and wherever possible, if it can be proved these are wild caught birds, they are rehabilitated and released back into the wild.

CONCLUSIONS

Once again, this report identifies how crime can impact on the wildlife of England and Wales.

Some of our most iconic species face threats from clearly defined interests often associated with country pursuits and development. It is clear that Link members engaged in fighting different types of wildlife crime face a number of common problems. Most commonly these relate to:

- The lack of a comprehensive system for recording wildlife crime, hampering the analysis of trends, the setting of appropriate priorities, and the effective allocation of resources.
- The willingness and ability of the police to address wildlife crime effectively.
- Uncertainty as to the admissibility of evidence.
- Absence of comprehensive sentencing guidelines.
- The ever more common use of the internet to facilitate and commit wildlife crime.

Many members of Wildlife and Countryside Link wish to and are ready to assist those responsible for the prevention, investigation and prosecution of wildlife crime. A number have specialist resources available to assist the statutory agencies.

Recommendations

Despite the breadth of wildlife crime, a number of partners, often with very different interests, identify common problems associated with addressing wildlife crime. It is encouraging that in recent months the government and its agencies have engaged in conversation over some of the issues. We hope that when our report for 2018 is published we will be able to show that our initial optimism has progressed to tangible results.

- Wildlife crimes should become notifiable and recordable, and included in statistical returns made by the police to the Home Office. The Home Office should produce an annual report on wildlife crime, identifying trends and recommending appropriate priorities and resource allocation.
- Each police force should appoint a force champion for wildlife crime, with coordinating responsibilities for a team of trained wildlife crime officers.
- Police officers and appropriate members of staff receive sufficient training to enable them to identify reports of wildlife crime and to respond in an effective manner.
- That the National Wildlife Crime Unit receives the long term funding required to allow for effective assistance to be provided to officers investigating wildlife crime and the resources for the purposes of identifying wildlife crime and associated intelligence on the internet.
- The Crown Prosecution Service ensures that specialist wildlife crime prosecutors continue to be available in all parts of England and Wales.
- Contentious issues around the admissibility of evidence be identified, discussed and remedied.
- In order to aid informed and adequate sentencing, a comprehensive wildlife crime sentencing guideline be produced by the Sentencing Council.
- A partnership approach to all types of wildlife crime aimed at raising public awareness and crime prevention be pursued.



REFERENCES

1. https://www.wcl.org.uk/assets/uploads/img/assets/uploads/Link_Recording_Wildlife_Crime_in_England_and_Wales_full_November_2017.pdf
2. Reports/reported - This is the total number of incidents reported to the reporting organisation each year for the category of offence in question. (i.e. this includes all of the below categories: confirmed, probable, unconfirmed.)
Confirmed - The circumstances indicate that an illegal act has taken place. These incidents are typically substantiated by evidence.
Probable - The circumstances indicate that by far the most likely explanation is that an illegal act has taken place.
Unconfirmed - The circumstances indicate that an illegal act has possibly taken place.
3. <https://www.npcc.police.uk/documents/crime/2018/NPCC%20Wildlife%20Crime%20Policing%20Strategy%202018%20%202021.pdf>
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8. <http://www.wisescheme.org/>

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