

The Rt Hon Suella Braverman KC MP
Secretary of State for the Home Department

Sent by email

3 July 2023

Dear Secretary of State,

Notifiable status for key wildlife crimes

As the leaders of organisations working at the frontline of wildlife crime, we are writing this open letter to express our disappointment at delays to consideration of changes that would enable police forces to better detect and deter this growing form of criminality.

Data collected by members of Wildlife & Countryside Link (Link) through annual [wildlife crime reports](#) suggests that wildlife crime in England and Wales has risen by a third since 2019. This data is only indicative, as wildlife crimes are not notifiable and as such there is no central, official database charting the prevalence of these crimes. Link's annual reports attempt to fill this gap, in the absence of official data.

Police forces are clear that addressing this recording deficit is essential to halting the rise in wildlife crime.

Survey work carried out by Naturewatch Foundation found that 87% of responding wildlife crime officers supported key wildlife crimes being given notifiable status. This support was reiterated in recent literature review and survey work from Nottingham Trent University and the University of Gloucestershire, commissioned by the International Fund for Animal Welfare (IFAW). As described in IFAW's "[Make Wildlife Matter](#)" report (May 2023):

"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."

Police support for notifiable status has been formally communicated through representations from the National Police Chiefs Council (submitted in 2020), and through repeated requests from the National Wildlife Crime Unit (NWCU). These representations have been fully supported by charities and eNGOs working on wildlife crime. In July 2022 Link met with Home Office and Defra officials to discuss the case for making a shortlist of key wildlife crimes (agreed between Link and the NWCU) notifiable. Link subsequently submitted a full [evidence dossier](#) to the Home Office for consideration.

It is disappointing that, a year on from this meeting and after years of police, charity and eNGO calls for action, the Home Office appear not to have progressed these recommendations any further.

It has previously been suggested that the delay in Government action in this matter could be due to a view that, in order to reduce demands on the police, notifiable status should be reserved for crimes that could lead to people being physically harmed.

Even if this view is adopted, the case for notifiable status for key wildlife crimes remains strong. The police survey work commissioned by IFAW in their May 2023 report found that police forces believe that there are close links between wildlife crime and offences that hurt people.

The survey findings showed that wildlife crime is not currently considered a core policing issue and is not given the same priority as 'mainstream' crimes. This is despite all of the wildlife crime officers questioned stating that wildlife offending was linked to other forms of serious crime, and 89% saying that wildlife crime should be given the same priority as more traditional types of crime. 50% of responding forces highlighted wildlife crime links to firearms and violent crimes, with 38% also flagging a direct link between wildlife criminals and drug offences (full academic study available [here](#)). The fact that only a small amount of serious wildlife crimes are notifiable was seen as an issue by all of the enforcement officers who completed questionnaires and was reported across trade media (see article in [Police Professional](#)).

These figures reflect similar links highlighted by the NWCUC, who report that wildlife crimes in the UK are particularly associated with anti-social behaviour and violent offences.

Offences committed against wild animals are a [warning sign](#) of offences committed against people. Enabling the better detection of wildlife criminals through improved record keeping can help put people who pose a real danger to others into the criminal justice system, imposing sanctions which can deter offending.

Such improved record keeping will not pose serious capacity issues. The NWCUC have highlighted that most wildlife crimes are dealt with by dedicated wildlife and rural crime teams that are already in place in most police forces. It is these teams that will service the limited additional demand arising from a limited amount of wildlife crimes gaining notifiable status. The survey work commissioned by IFAW shows that it is in these teams that the greatest support for notifiable status can be found. The extension of notifiable status to key wildlife crimes would be a low-cost policy, reducing criminality without significant new expenditure.

It would also contribute to meeting the Environment Act target to halt the decline in species abundance by 2030, a core aim of the Government's [Environmental Improvement Plan](#). The scale of wildlife crime is such that it does have a [discernible impact](#) on the population of certain species, including some of the indicator birds of prey species used to measure progress towards the species abundance target.

In light of the above, the ongoing delay to the Home Office's progression of repeated, evidenced requests to grant notifiable status to key wildlife crimes is concerning.

The extension of notifiable status to some wildlife crimes is a strategic, effective and resource-efficient measure, supported by key police units, wildlife charities and eNGOs. Enthusiastic responses to campaigns for notifiable status run by [Naturewatch Foundation](#), [IFAW](#) and [Badger Trust](#) indicate strong public support.

This change to crime recording will allow the scale and character of wildlife crime to be better mapped, enabling the police to tackle key offenders and deter offending. Such effective tackling of wildlife crime will help to protect threatened wildlife species, and reassure the communities affected by it and associated criminality against people and property.

After years of delay, notifiable status for wildlife crimes should be swiftly delivered to the benefit of policing, nature and people.

Yours sincerely,

Sonul Badiani-Hammett, Country Director, FOUR PAWS UK
Claire Bass, Senior Director of Campaigns and Public Affairs, HSI UK
Richard Benwell, CEO, Wildlife and Countryside Link
Nino Brancato, National Enforcement Support Manager, Angling Trust
David Bunt, CEO, Institute for Fisheries Management
Sarah Carr, CEO, Naturewatch Foundation
Dominic Dyer, Policy Advisor and Wildlife Advocate, Born Free (Chair of Link Wildlife Crime Group)
Dr Tony Gent, CEO, Amphibian and Reptile Conservation
Frances Goodrum, Head of Campaigns and Programmes, IFAW
Peter Hambly, Executive Director, Badger Trust
Jenny Hawley, Policy Manager, Plantlife
Bethan Laughlin Senior Policy Specialist, ZSL
Anna Moscrop, UK Policy Manager, Whale & Dolphin Conservation
Matt Shardlow, CEO, Buglife
Kit Stoner, CEO, Bat Conservation Trust
Dr Ruth Tingay, Director, Wild Justice
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Replies can be sent to matt@wcl.org.uk

CC:

The Rt Hon Yvette Cooper MP, Shadow Secretary of State for the Home Department
The Rt Hon Chris Philp MP, Minister of State for Crime, Policing and Fire
The Rt Hon Lord Benyon, Minister of State (Minister for Animal Welfare), Department for Environment, Food and Rural Affairs
Alex Sobel MP, Shadow Minister for Nature Recovery and the Domestic Environment