

Rt Hon Ben Wallace MP
Secretary of State for Defence
Ministry of Defence
Horse Guards Avenue
London, SW1A 2HB

By email

13 January 2023

Dear Secretary of State,

Termination of the Memorandum of Understanding Between the League Against Cruel Sports and the Ministry of Defence

I am writing to you as Chair of the Wildlife and Countryside Link Wildlife Crime Working Group.

Link is the largest environment and wildlife coalition in England, bringing together 67 organisations which advocate for and are directly involved in the protection of nature, animals and people.

Link's Wildlife Crime Working Group exists to improve the conservation and protection of wild animals threatened by domestic wildlife crime and associated welfare issues. The group regularly engages constructively with government and enforcement bodies such as the National Wildlife Crime Unit, with members also sitting on the latter's various wildlife crime Priority Delivery Groups and delivering training to police forces.

We wish to raise our concerns about the recent unilateral termination of the Memorandum of Understanding between the League Against Cruel Sports, a member of the Wildlife Crime Working Group, and the Ministry of Defence¹, and the implications for wildlife crime on Government land.

The longstanding MoU was in place since 2009 and was most recently updated in 2020. Among other related terms, it provided for the sharing of information on the licensing of hunting on land managed by the Ministry of Defence, so that it can be monitored for compliance with the law.

Your letter terminating the agreement and subsequent public comments have not identified any specific reasons for this action which relate to the League – a registered charity – or its staff. Link is opposed to any violent behaviour connected to hunting and the hunting debate, including any assaults on hunters. We are not aware of any such allegations against League monitors on MoD land. League monitors conduct their work by peacefully observing hunts from a distance.

This monitoring detects breaches of the Hunting Act 2004 and over the years has helped the police to uphold the law and prosecute offenders.

¹ <https://www.itv.com/news/2022-12-20/defence-secretary-ben-wallace-throws-veil-of-secrecy-over-hunting>

Wildlife and Countryside Link's annual Wildlife Crime Report highlights that a considerable weight of evidence from monitors across England and Wales suggests that breaches of the Hunting Act continue to take place at scale, as part of a wider trend of rising levels of wildlife crime.²

This is supported by figures recently compiled and released by the League, revealing 303 reports of either suspected illegal hunting or havoc caused by hunts in the five and a half weeks between 1 November and 7 December 2022.³

The termination of the Memorandum of Understanding between the League Against Cruel Sports on MoD land will reduce its capacity to monitor hunting activity and to ensure it is lawful. This will hinder efforts to tackle illegal hunting, and wildlife crime more generally. Monitoring can make an important contribution to police work to reduce the prevalence of wildlife crime.

We urge you to review the termination decision, which serves to reduce scrutiny of wildlife crime and protect its perpetrators, while providing no discernible benefit to security, the public, animals or the environment. It would be useful to understand the reasons for the suspension of the Memorandum of Understanding, and the evidence considered before this decision was taken.

We would be grateful for your response to the concerns raised in this letter and the opportunity to meet to discuss them further. We are committed to working with Government to tackle all kinds of wildlife crime. We hope very much that a constructive solution can be found to allow ongoing monitoring on Ministry of Defence land.

Yours sincerely,

Dominic Dyer
Chair, Wildlife Crime Working Group
Replies can be sent to matt@wcl.org.uk

This letter is supported by the following organisations belonging to the Wildlife Crime Working Group:

Born Free
Badger Trust
RSPCA
Humane Society International UK
League Against Cruel Sports
IFAW (International Fund for Animal Welfare)
Bat Conservation Trust
FOUR PAWS UK
Angling Trust
Institute of Fisheries Management
Whale & Dolphin Conservation
Wild Justice

² https://www.wcl.org.uk/docs/assets/uploads/WCL_Wildlife_Crime_Report_2021_29.11.22.pdf

³ <https://www.league.org.uk/news-and-resources/news/boxing-day-parades-mask-fox-hunt-brutality/>