

# The case for notifiable status for key wildlife crimes

Giving key wildlife crimes, such as badger baiting and hare coursing, notifiable status has been a longstanding recommendation from Wildlife & Countryside Link (Link) and from the National Wildlife Crime Unit (NWCU), supported by a wide spectrum of individuals and organisations involved in regulatory and enforcement services. It is the clear view of both wildlife NGOs and the police unit at the forefront of combatting wildlife crime that national-level recording of these offences is required to better protect wild species, habitats and people.

Link had an encouraging meeting to discuss these recommendations with then Parliamentary Under-Secretary of State for Crime, Victoria Atkins MP, in 2018. Appendix 1 contains a letter from the Minister following the meeting, which confirmed that the recommendations would be actively considered following representations from the National Police Chiefs Council (NPCC). NPCC representations were subsequently submitted in 2020 (see appendix 2).

Despite these positive developments, there has still been no movement on making key wildlife crimes notifiable. In response to this lack of progress, representatives of both Link and NWCU met with officials from the Home Office and Defra in July 2022 to again discuss the recommendations. At this meeting it was agreed that Link and NWCU would set out the arguments for giving a small number of wildlife crimes notifiable status, to enable further consideration by the Home Office. This paper makes that case.

# By tackling animal abuse and exploitation, people are protected

The threshold for notifiable status for crimes is rightly high, being concerned primarily with crimes that inflict harm or could lead to people being harmed.

There is a significant body of evidence which demonstrates that crimes against animals leads to crimes against people. A twenty-year study by the Northeastern University in the USA found that 70% of all animal abusers committed at least one other criminal offence.<sup>1</sup> A further series of studies profiled by the University of Michigan<sup>2</sup> record that:

- 100% of sexual homicide offenders examined had a history of cruelty towards animals.
- 40% of animal abusers have committed violent crimes against people
- 63.3% of men who had committed crimes of aggression admitted to cruelty to animals.
- 48% of rapists and 30% of child molesters reported committing animal abuse during childhood or adolescence.

In the words of one domestic violence expert quoted by the University of Michigan: "Animal abuse must be redefined as a crime of violence...it must be perceived and documented as a human welfare issue." A number of high-profile murderers have well-documented cases of animal abuse in their earlier history, including Ted Bundy, the Columbine shooters and Patrick Mackay

<sup>&</sup>lt;sup>1</sup> <u>http://support.mspca.org/site/DocServer/cruelty-to-animals-and-other-crimes.pdf?docID=12541</u>

<sup>&</sup>lt;sup>2</sup> <u>https://www.animallaw.info/article/link-cruelty-animals-and-violence-towards-people</u>



The "Perspectives on Criminality in Wildlife" chapter of the Critical Criminological Perspectives book series suggests that these trends are evident in the UK also. The chapter includes the following reflection: "Attitudes towards wild animals both on the part of offenders who harm them and the society that punishes them, or in some cases allows the harm to continue, reveal much about tolerance for different forms of violence within society, sympathy towards the suffering of others, the capacity for empathy or an inclination towards violence."<sup>3</sup>

The NWCU report that wildlife crimes in the UK are particularly associated with anti-social behaviour, property damage and violent offences. It is notable that the Domestic Abuse, Stalking and Honour Based Violence Risk Identification, Assessment and Management Model (DASH) used across police forces includes questions around mistreatment of animals, as an indicator of violence towards women and girls.<sup>4</sup>

There have been a number of recent high-profile incidents in the UK of wildlife criminals inflicting serious violence on people when confronted about their persecution of wild animals.<sup>5</sup>

Cruelty to animals is a clear warning sign of violent behaviour towards people. As such identifying and successfully prosecuting animal abusers can help put people who pose a real danger to others into the criminal justice system, imposing sanctions which can deter offending. By recording crimes against animals and thereby enabling more effective detection and prosecution of offenders, police forces can better protect communities, both rural and urban.

# The Animal Welfare (Sentencing) Act 2021

This argument has already been accepted by the Government, through the passage of the Animal Welfare (Sentencing) Act 2021. The Act increased sentences for those convicted of offences under several sections of the Animal Welfare Act 2006 from six months to five years, thereby making those offences notifiable.

This means that, when the Act came into force in June 2021, several offences solely directed at animals and not at people were entered on the Home Office's list of notifiable crimes<sup>6</sup>, including:

- Organising an animal fight.
- Removing or causing or permitting or failing to prevent removal of dog's tail other than for medical treatment.
- Administration of poisons to a protected animal.

<sup>&</sup>lt;sup>3</sup> https://link.springer.com/chapter/10.1057/9781137273994 8

<sup>&</sup>lt;sup>4</sup> <u>https://www.dashriskchecklist.co.uk/wp-content/uploads/2022/02/DASH-2009-2016-with-quick-reference-guidance.pdf</u>

<sup>&</sup>lt;sup>5</sup> See badger baiting related incident in Bolton in 2021:

https://www.theboltonnews.co.uk/news/20113687.bolton-victim-badger-baiter-attack-calls-change-law/ & hare coursing related incidents in Lincolnshire in 2017: <u>https://www.bbc.co.uk/news/uk-england-lincolnshire-</u>38530950

<sup>&</sup>lt;sup>6</sup><u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1083850/not\_ifiable-offence-and-notifiable-reported-incidents-May-2022.ods</u>



During the passage of the Act through Parliament, Ministers acknowledged, on a number of occasions, that the legislation would help protect people, as well as animals. At second reading in the Lords, Lord Goldsmith stated:

"The noble Baroness, Lady Fookes, mentioned that there is often a connection between cruelty to animals and cruelty to children, a point repeated by the noble Lords, Lord Taylor of Holbeach and Lord Trees, and the noble Baroness, Lady Eaton, who backed up the assertion with some compelling evidence. The noble Lord, Lord Mackenzie of Framwellgate, further backed up that assertion by using his long experience in the police force, citing in particular the grim case of Ian Brady. It is clearly right to make that connection."

Lord Goldsmith also made clear that the offences covered by the Act could, under certain circumstances, be committed against wild animals:

"The noble Baroness, Lady Hayman of Ullock, talked first about sentencing for offences concerning animals in their wild state. Such sentencing is already a separate matter and not in scope of the Animal Welfare Act 2006. I think she made the point herself that that Act applies to vertebrate animals "under the control of man", including wild animals under "permanent or temporary" control. That could include, for example, where a wild animal is caught in a trap or snare and it means that all animals under the control of man, whether domesticated or wildlife, will be subject to the new maximum penalty."<sup>7</sup>

The acceptance by the Government of the principle that protecting animals can protect people from violence, and last year's placing of crimes directed against animals (including, in exceptional circumstances where they are under people's control, wild animals) on the notifiable list, allows the case for notifiable status for key wildlife crimes to be considered anew.

Furthermore, in 2021, the UK Government invited a team from the United Nations Office on Drugs and Crime (UNODC) to assess the UK's current approach to tackling wildlife crime. One of the key recommendations from the subsequent 'Wildlife and Forest Crime Analytic Toolkit Report: United Kingdom of Great Britain and Northern Ireland' report was for the UK Government to make wildlife crimes notifiable.<sup>8</sup>

### Notifiable status will increase the detection and prosecution of wildlife crime

Currently, police services cannot say precisely how much wildlife crime actually takes place within England and Wales, because wildlife crime offences are not notifiable, except in the very limited circumstances set out above. Wildlife NGOs belonging to the Link coalition have filled the gap by recording their own data on known police incidents and supporting the annual Link wildlife crime report, which collates the numbers of incidents and prosecutions member organisations are aware of. These annual reports provide a best estimate of the prevalence of wildlife crime, in the absence of official data. There are large gaps in the data, due to its voluntary collation and non-official status.

<sup>&</sup>lt;sup>7</sup> <u>https://hansard.parliament.uk/lords/2021-04-16/debates/6D25D736-FC11-4550-AE23-AD6153737DDA/AnimalWelfare(Sentencing)Bill</u>

<sup>&</sup>lt;sup>8</sup> <u>https://www.wcl.org.uk/the-government-has-been-given-a-comprehensive-plan-to-tackle-wildlife-crime-will-it-implement-it.asp</u>



The most recent Link Wildlife Crime report, published in November 2021<sup>9</sup>, suggests concerning spikes in wildlife crimes against National Wildlife Crime Priority species in England<sup>10</sup>, including reports of crimes against badgers (up 25%) and crimes against birds of prey (up 100%).

As the report sets out, police work to tackle the increasing scale of this offending is being hampered by the lack of official data at a national level. Police forces are struggling to gauge the true extent of wildlife crime and to plan strategically to address it due to the patchy records of the crimes committed. This was highlighted in the 2021 UNODC report as key reason for their recommendation to make wildlife crimes notifiable. The UNODC report set out how:

"Wildlife crime data exists in some format at each point of the criminal justice system in administrative statistics; however, it is scattered, varied, and often provides an incomplete picture of the scale, variability, and impact of these offences...That wildlife crimes are not recordable and notifiable across the UK means that wildlife crime statistics lack even the basic elements of the aforementioned crime recording 'best practices' to adequately measure the scale and nature"<sup>11</sup>

Operation Galileo illustrates the impact these data gaps are having. The Operation was started in 2018 by Lincolnshire Police, who sought to understand more about the national hare coursing picture. The force identified and contacted 35 other forces which had recorded hare coursing within their area. Of these 23 were unable to provide any further detail due to a lack of records. Despite the introduction of tougher sentences for hare coursers in 2022<sup>12</sup>, it remains difficult for police forces to gauge the true extent of coursing, and to plan strategically to address it, due to the limited records of the crime.

Having a clear and up-to-date data base of this criminal activity is a pre-requisite for successfully addressing it, allowing repeat offenders to be tracked and offending patterns to be observed. As highlighted in the 2020 NWCU strategic assessment of UK wildlife crime:

"Accurate measuring of confirmed crimes will assist in the identification of national, regional and local priorities. Geographical 'hot-spots', trends and patterns would be revealed by location and over time. Police forces need to identify crime levels so they can make appropriate resource allocation to effectively investigate. It is currently impossible to obtain accurate data on wildlife crime levels in England and Wales."

The granting of notifiable status to certain offences could significantly improve the chances of detecting and successfully prosecuting wildlife criminals.

# Wider benefits of notifiable status

Extending notifiable status to certain wildlife crimes would help deliver on a number of key Government priorities, beyond the core policing priority of protecting people from harm.

<sup>&</sup>lt;sup>9</sup> <u>https://www.wcl.org.uk/wildlife-crime.asp</u>

<sup>&</sup>lt;sup>10</sup> List of National Wildlife Crime Priority species can be found here:

https://www.gov.uk/government/groups/partnership-for-action-against-wildlife-crime

<sup>&</sup>lt;sup>11</sup> <u>https://www.unodc.org/documents/Wildlife/UK Toolkit Report.pdf</u>

<sup>&</sup>lt;sup>12</sup> <u>https://www.nfuonline.com/updates-and-information/hare-coursing-new-powers-and-tougher-penalties/</u>

<sup>&</sup>lt;sup>13</sup> <u>https://www.nwcu.police.uk/wp-content/uploads/2021/01/Strategic-Assessment-UK-Wildlife-Crime-November-2020-public-version.pdf</u>



It would progress the Government commitment, set out in the Animal Welfare Action Plan 2021<sup>14</sup>, to do more to tackle wildlife crime. This commitment was re-iterated in December 2021, in the Government's response to the UNODC report on UK wildlife crime.<sup>15</sup>

It would also contribute to meeting the Environment Act target to halt the decline in species abundance by 2030.<sup>16</sup> 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. A number of studies have shown that the persecution of birds of prey species is inhibiting their population growth.<sup>17</sup>

The commitment to tackle gang-related crime would also be advanced. In many parts of England and Wales, the same gangs that organise wildlife crime also organise other crimes. Farming groups have reported an illustrative pattern of crimes associated with hare coursing.<sup>18</sup> Gang members trespass on farms to kill hares with their dogs and use the opportunity to scout for other criminal opportunities on the farm, with thefts of farm machinery and other valuables often occurring a few weeks later. As illustrated by a September 2022 conviction, there are close links between hare coursing gangs and drug trafficking.<sup>19</sup>

Finally, it should be noted that notifiable status for wildlife crimes benefits from broad support. Naturewatch Foundation's 'Make wildlife count' campaign has been supported by thousands of members of the public<sup>20</sup>, and the case for notifiable status has been repeatedly made in Parliament<sup>21</sup> and in the press.<sup>22</sup>

# Priority wildlife crimes for consideration

In early 2021 Link and the NWCU developed a shortlist of high impact wildlife crimes, recommending they be prioritised for notifiable status.<sup>23</sup> This shortlist was sent to the Home Office and to Defra.

The list includes the following offences, which we understand are of particular interest to the Home Office:

<sup>&</sup>lt;sup>14</sup> <u>https://www.gov.uk/government/publications/action-plan-for-animal-welfare</u>

<sup>&</sup>lt;sup>15</sup> <u>https://www.gov.uk/government/news/un-report-praises-uk-efforts-on-wildlife-and-forest-crime</u>

<sup>&</sup>lt;sup>16</sup> <u>https://www.gov.uk/government/news/landmark-environment-bill-strengthened-to-halt-biodiversity-loss-by-2030</u>

<sup>&</sup>lt;sup>17</sup> See Wotton, S.et al (2018), Status of the Hen Harrier in the UK and Isle of Man:

https://www.tandfonline.com/doi/full/10.1080/00063657.2018.1476462 & Smart, J. et al. (2010), Red Kites: https://www.researchgate.net/publication/232361176 Illegal killing slows population recovery of a reintroduced raptor of high conservation concern - the Red Kite Milvus milvus

 <sup>&</sup>lt;sup>18</sup> https://www.nationalruralcrimenetwork.net/news/yas-harecoursing/

 <sup>&</sup>lt;sup>19</sup> https://www.fwi.co.uk/news/hare-courser-jailed-for-part-in-100m-drugs-ring

<sup>&</sup>lt;sup>20</sup> https://action.naturewatch.org/ask-minister-state-home-office-tom-pursglove-mp-value-wildlife-make-it-count

<sup>&</sup>lt;sup>21</sup> <u>https://hansard.parliament.uk/Commons/2019-03-20/debates/741BA045-B56B-4D9F-BC9D-</u>29E9BD4A92D3/WildlifeCrime

<sup>&</sup>lt;sup>22</sup> <u>https://www.theguardian.com/environment/2021/nov/25/reports-of-wildlife-surged-in-england-and-wales-in-</u>2020-survey

<sup>&</sup>lt;sup>23</sup>https://www.wcl.org.uk/docs/assets/uploads/Shortlist of wildlife crimes to be made notifiable 18.02.21.pdf



# Badger persecution

Section 1 of the Protection of Badgers Act 1992 - Taking, injuring or killing badgers. Section 2 of the Protection of Badgers Act 1992 - Cruelty to badgers. Section 3 of the Protection of Badgers Act 1992 - Interfering with badger setts.

Badger persecution is a National Wildlife Crime Priority. Badgers continue to face persecution, including through badger baiting, and there are strong links to organised crime and other criminality. Notifying these crimes will enable effective investigation in keeping with national standards. The current incident data recorded by NGOs shows crimes against badgers to be increasing in volume. Recording by official Home Office standards will drive a more effective approach and give public confidence in policing this sensitive issue.

# Hare coursing

Section 1 of Hunting Act 2004 - Hunting wild mammals with dogs. Section 30 of Game Act 1831 - Trespassing in the day-time upon lands in search of game. Section 1 of Night Poaching Act 1828 - Persons taking or destroying game by night.

Hare coursing has particularly strong links to organised crime and carries a significant community impact. The human victims, who are usually farmers, incur high costs due to livelihood and crop damage, and can feel particularly vulnerable to coursing offenders due to living in isolated locations.<sup>24</sup> This criminality could also have a significant ecological impact - brown hare numbers are declining and they are a priority species for conservation under the UK Biodiversity Action Plan.<sup>25</sup>

### Birds of prey and endangered species persecution

Sections 1(1) (a) 1(4), 5 and 21(1) of Wildlife & Countryside Act 1981 - Killing, injuring or taking any wild bird.

Birds of prey persecution is a National Wildlife Crime Priority, with reports of offences up by 100% in the past year.<sup>26</sup> Criminal offences against birds of prey should be recorded to raise their profile within law enforcement and to acknowledge their impacts on the viability of threatened bird populations. Bird of prey persecution can involve the use of highly toxic chemicals to kill target species. This can present wider risks to animals and people, including the accidental poisoning of pet dogs.<sup>27</sup>

The more effective detection and prosecution of badger persecution, hare coursing and birds of prey persecution would help to put more wildlife criminals into the criminal justice system, better protecting the public from violent offenders.

We would also draw attention to the following impactful wildlife crimes from the Link and NWCU shortlist:

<sup>&</sup>lt;sup>24</sup> The following case provides an example of the levels of violence coursing offenders can exhibit: <u>https://www.fwi.co.uk/news/crime/hare-courser-holds-gun-to-farmers-head</u>

<sup>&</sup>lt;sup>25</sup> <u>http://hare-preservation-trust.com/species-status/brown-hare-history-status/</u>

<sup>&</sup>lt;sup>26</sup> <u>https://www.rspb.org.uk/about-the-rspb/about-us/media-centre/press-releases/birdcrime-2020/</u>

<sup>&</sup>lt;sup>27</sup> See Yorkshire incident in 2020: <u>https://www.yorkshirepost.co.uk/news/crime/owners-dog-poisoned-raptor-bait-nidderdale-speak-their-devastation-2928184</u>



- <u>Section 27A of the Salmon & Freshwater Fisheries Act 1975</u> Fishing without a licence, including using a net, explosives or poison to catch a large number of salmon or sea trout in a short period. Salmon and sea trout populations are protected as their populations are declining. As such these offences can cause significant ecological damage. An offender convicted in 2022 was estimated to have been alone responsible for the loss of 686,534 salmon eggs and 2,285,164 sea trout eggs.<sup>28</sup> Stronger enforcement of Section 32 of the Salmon Act 1986 and of Cites regulations concerning the export of glass eels<sup>29</sup> would also help to address the harm caused by illegal overfishing.
- <u>Section 9 of the Wildlife and Countryside Act 1981</u> Intentional damage to species protected under Schedule 5 of the Act and/or their habitats. With 15% of UK species at risk of extinction, wild populations and their habitats must be effectively protected to prevent further decline.<sup>30</sup> Species protected by Schedule 5 of the Act include threatened invertebrates, who are particularly vulnerable to habitat destruction caused by illegal development, and butterflies harmed by the illegal butterfly trade. Making Section 9 WCA offences notifiable would allow trading patterns to be identified and enable action to close down trading routes.
- <u>Section 43 (1) of the Habitats and Species Regulations 2017</u> Offences against European protected species and their habitats from destruction. A number of key species which do not benefit from Wildlife and Countryside Act protections (see above) are protected under these regulations, making them an important part of the mosaic of safeguards preserving the species and habitats important to nature's recovery. Bat populations provide a good example of the value that notifiable status for offences against European protected species would provide. Development into bat habitats affects populations, but a lack of data makes understanding the extent and pattern of these crimes difficult. Notifiable status would allow development impacts on threatened bat populations to be mapped, and targeted action taken to address it.

### Impact on police resources

In 2020 the National Police Chiefs Council (NPCC) made representations to the Home Office, calling for more wildlife crimes to be made notifiable, including the crimes profiled above (see appendix 2). The NPCC representation considered the impacts of this on policing resources, concluding that: *"Making the recommended crimes notifiable will have a manageable impact on Police Forces. Some crime types are low in number but critical for the reputation of Policing, such as offences under the Wildlife and Countryside Act and the Protections of Badgers Act."* 

The NWCU has also 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. As such, significant new demands will not fall on officers working in other areas. As stated by NPCC, the low number of most wildlife crimes means that new work from notifiable status will in most cases be manageable within existing wildlife and rural crime teams. Furthermore, the additional recording time

<sup>29</sup> See page 16 of the Link Wildlife Crime report 2020:

https://www.wcl.org.uk/docs/WCL\_Wildlife\_Crime\_Report\_Nov\_21.pdf

<sup>&</sup>lt;sup>28</sup> <u>https://naturalresources.wales/about-us/news-and-events/news/61-000-to-be-confiscated-from-ringleader-of-20-year-teifi-poaching-operation/?lang=en</u>

<sup>&</sup>lt;sup>30</sup> https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf



for wildlife and rural crime teams will to some extent be compensated for by the targeting and strategy insights the new data will provide. These teams also currently have to deal with a significant quantity of Freedom of Information requests, from members of the public seeking to gauge the scale of wildlife crime. Official data would provide this information, freeing up time officers currently spend on FOI responses.

Hare coursing is one area of wildlife crime where notifiable status may have significant resourcing implications, as NWCU estimate that there are at least 3,000 coursing crimes committed per year. The NWCU have committed to working with police forces, the Crime Registrar and Home Office to provide a solution around best practice reporting, making use of technology and digital reporting platforms to ease the onus on policing arising from making coursing offences notifiable. This small increase in resourcing demand around coursing would align with the priority status the Government has accorded to tackling coursing offences. On 1 August 2022 tough new measures to tackle hare coursing were introduced, giving the police and the courts more powers to tackle these offences. When announcing the reforms, then Secretary of State for Defra George Eustice acknowledged the impacts of coursing crimes, saying that *"tough measures will clamp down on the scourge of hare coursing, which blights rural communities up and down the country"*.<sup>31</sup>

# Conclusions

The Animal Welfare (Sentencing) Act 2021 has created a precedent for crimes directed against animals (including wild animals) being made notifiable.

A number of wildlife crimes clearly meet the criteria for notifiable status, including badger persecution, hare coursing and birds of prey persecution offences. The placing of these offences on the notifiable list would:

- Improve the detection and prosecution of key wildlife crimes
- Better protect people in the process, by helping put violent offenders in the criminal justice system
- Advance Government priorities, including those in the Animal Welfare Action Plan and the Environment Act 2021.

Both the NPCC and the NWCU have provided compelling evidence that this extension of notifiable status to some wildlife crimes would not create undue demands on police forces.

The extension of notifiable status to some wildlife crimes is a strategic, effective and resource-efficient measure, supported by key police units and by wildlife NGOs. It should be delivered, to the benefit of policing, nature and people.

<sup>&</sup>lt;sup>31</sup> <u>https://www.gov.uk/government/news/new-legislation-to-crack-down-on-illegal-hare-coursing-now-in-force</u>



Wildlife and Countryside Link (Link) is the largest nature coalition in England. This paper has been prepared by Link members, with welcome input from the National Wildlife Crime Unit and Defra.

For questions or further information please contact: Matt Browne, Head of Policy & Advocacy, Wildlife and Countryside Link E: <u>matt@wcl.org.uk</u> 14.10.22



#### Appendix 1 – 2019 letter from Parliamentary Under-Secretary of State for Crime



Victoria Atkins MP Minister for Crime, Safeguarding and Vulnerability

2 Marsham Street, London SW1P 4DF www.gov.uk/home-office

1 O JAN 2019

Mark Jones Chair, Wildlife and Countryside Link Wildlife Crime Working Group

c/o Zoe Davies Policy and Campaigns Manager Wildlife and Countryside Link 89 Albert Embankment London SE1 7TP

HOCS Reference: MIN 0016819/18

Mr. Jones, Dear

Thank you for your letter of 13 November 2018 about the recording of wildlife crime. I am sorry for the delay in my response.

The Government recognises the importance of tackling wildlife crime. That is why, along with the Department for Environment, Food and Rural Affairs, the Home Office directly funds the National Wildlife Crime Unit (NWCU) to support its work to tackle these crimes in addition to providing funding to police forces to tackle all types of crime, including wildlife crime.

When I met representatives of the Wildlife and Countryside Link on 5 July 2018 I confirmed that the Home Office would consider a proposal from the National Police Chiefs' Council (NPCC) for making a further selection of wildlife crimes notifiable, for the purpose of bringing them into the main count of Police Recorded Crime. I also confirmed that we would expect the proposal to be endorsed by the Association of Police and Crime Commissioners (APCC).



You ask that the starting point for the NPCC's proposal should be the crimes that form the conservation and enforcement priorities set out in the Wildlife Crime Policing Strategy launched by the NPCC on 25 July 2018. As you know, the NWCU gathers intelligence from a number of organisations, above and beyond incident data from police forces, and it is that intelligence which ultimately determines the UK's wildlife crime priorities and the actions taken to tackle those crimes. It is therefore possible that, should it believe there are offences where the intelligence picture is perhaps less developed, the NPCC may decide to focus its proposal on a selection of offences that sit outside the current set of UK wildlife crime priorities. While I welcome your views on this subject, I hope that you can appreciate that I do not want to second-guess the NPCC's proposal.

I am copying this letter to Deputy Chief Constable Craig Naylor (NPCC lead for Wildlife Crime) and to Chief Inspector Louise Hubble OBE (Head of the NWCU).

ours sincerely

Victoria Atkins MP



Appendix 2 – 2020 representation from NPCC asking for some wildlife crimes to be notifiable (first page only, full representation can be provided on request)

OFFICIAL



WILDLIFE CRIME & RURAL AFFAIRS

#### Proposal for Wildlife Crime types to be made notifiable

#### INTRODUCTION

Paragraph 5.3.2 of the National Police Chiefs Council Wildlife Crime Policing Strategy 2018 - 2021 recognises the need to widen the number of notifiable wildlife crimes so as to better understand and reflect the range and scale of the portfolio. In order to require police forces to inform the Home Office of an offence, it should be notifiable. Many offences that are indictable or triable either way are notifiable. This does not include many wildlife offences which are summary only. With the correct representation, the National Crime Registrar can assign summary offences as notifiable. There are currently over three-hundred wildlife crime offences on the statute books but only seventeen are notifiable.

The crimes recommended to be made notifiable are aligned to the <u>NPCC's National Wildlife Crime</u> priorities. The recommendations are based on Public, Police and Partner consultation and are deemed to be the most operationally useful to Policing UK. Making these changes will bring the best Policing outcome and align the best victim service in key accountability areas. The changes will enable forces to have a realistic overview of this area of demand. It is clear that crimes go unrecorded due to not being notifiable and Policing UK has had to rely on the work of wildlife crime <u>NGQ's</u> to collate incident statistics to allow us to have any measure of wildlife crime. However, there are indications that some NGO's may soon cease recoding incidents (due to constraints from the Covid-19 pandemic) so now is an appropriate juncture for change.

Wildlife crime is adopted locally by many forces due to the community impact of the crime and fear of crime associated with these offences. The proposed offences are not currently notifiable and are only recorded as a crime at the point of charging a suspect, so there is no true picture of crimes at the point of service.

Making the recommended crimes notifiable will have a manageable impact on Police Forces. Some crime types are low in number but critical for the reputation of Policing, such as offences under the Wildlife and Countryside Act and the Protections of Badgers Act.

#### OFFICIAL

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