UK Wildlife Crime Strategic Assessment 2025-2028
Public version



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National Wildlife Crime Unit (NWCU)

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20/06/2025

Foreword

Wildlife crime and the illegal wildlife trade continue to pose significant and evolving threats to the UK's natural heritage, economy, and to public confidence. Beyond their environmental consequences, these offences are increasingly recognised for their harmful societal impacts and their links to wider serious and organised crime. Offenders involved in abuse, killings and cruelty, illegal hunting, poaching, and the illicit trade in protected species are often connected to broader criminal networks, using similar methods of concealment, movement, and financial gain as other forms of organised criminality.

This Strategic Assessment presents a comprehensive review of the previous strategic cycle by assessing the UK's progress in tackling wildlife crime. It highlights key successes where partnership working, intelligence-led policing, and specialist interventions have made measurable impacts, as well as areas where performance and capability can be further strengthened.

The assessment examines the contributions of UK policing and the National Wildlife Crime Unit (NWCU), whose work remains critical to supporting UK police forces, coordinating national responses, and driving intelligence and joining up enforcement across borders. By reflecting on the collective achievements of the UK Wildlife Crime Priority Delivery Groups, this document also outlines key opportunities for future development and the resources needed to meet emerging threats.

Importantly, this Strategic Assessment has directly informed the future direction of wildlife crime enforcement in the UK. It identifies high-threat areas that will form the foundation of the next phase of our priority delivery work. This strategic clarity ensures that the UK remains professional and effective in its response to protecting vulnerable species, enforcing the law, disrupting serious and organised crime and those who seek to profit from the exploitation of our natural world.

Wildlife crime is not a niche issue. It is a serious crime, with serious consequences, requiring a serious and sustained response. This assessment is a step forward in that direction that will lead to the 2025 – 2029 Wildlife Crime Strategy.



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Executive Summary

Key Findings

- The illegal parrot, bird of prey and European eel trades are the highest risk CITES priorities.
- Development related wildlife crime identified as a cross-cutting theme which impacts multiple species.
- Funding and resource issues exist which impact on successful disruption of wildlife criminality.
- Data issues exist - these limit the ability to understand and respond effectively to current risks and threats.
- Current legislation is inconsistent, complex and outdated. Lack of sentencing guidelines results in inconsistent outcomes.
- Strong partnership working is essential to understand and tackle wildlife crime issues.
- Identifying and disrupting organised wildlife criminality showcases how serious organised crime activities facilitate wildlife crime, especially the illegal wildlife trade.
- Online wildlife crime risks are increasingly of note. There is concern that online threats are not fully assessed and evidential opportunities are missed.
- Enablers for wildlife crime are cyber, illicit finances, fraud, legal business structures and corruption.
- Intelligence gaps exist around poly criminality and crime convergence.



Strategic Recommendations

The following recommendations have been identified across the wildlife crime priorities and other issues raised within this assessment. Priority specific or species-specific intelligence gaps and recommendations can be found within the relevant sections of the document.

1. Illegal hunting with hounds to be raised as a wildlife crime priority.

2. Freshwater pearl mussel (FWPM) to be removed as a wildlife crime priority.

3. Development-related wildlife crime working group to be formed.

4. Identify and secure permanent funding to tackle wildlife crime.

5. Continue to raise the profile of wildlife crime by highlighting national wildlife crime priorities and other issues.

6. Increase reporting and recording of wildlife crime and intelligence – promoting high quality data capture. This will improve the accuracy of data analysis which in turn will assist decision making and resource allocation.

7. Improve understanding of wildlife crimes by making them Home Office notifiable.

8. Review wildlife crime legislation and develop sentencing guidelines to improve consistency and to ensure penalties better reflect seriousness of offending.

9. Enhance and nurture partnership working and stakeholder engagement through a co-ordinated response nationally via Priority Delivery Groups, working groups and national operations.

10. Increase identification, targeting and disruption of Organised Crime Groups and feed into the national picture of Serious & Organised Crime.

11. Ensure all opportunities for Proceeds of Crime Act seizures are considered.

12. Ensure all officers have basic knowledge of wildlife crime and ensure Police Wildlife Crime Officers have access to enhanced wildlife crime training resources.

13. Develop our understanding of poly criminality and risks of crime convergence within wildlife crime.

Introduction

WILDLIFE CRIME IS CRIME – Permanent funding and resources are needed to effectively tackle criminals who exploit and harm wildlife.

Wildlife crime poses a significant, real and ongoing threat to flora, fauna and the environment. The threat posed by criminals spans across different levels; from localised issues through to national concerns and extends across borders with international impacts.

A significant global issue is the illegal wildlife trade (IWT) – estimated to be worth ***£17billion a year.*** IWT is said to be the ***4th largest international crime*** - only behind drugs, firearms and human trafficking[1]. Wildlife crime can significantly impact conservation status by pushing species closer to extinction and criminal acts can result in pain and suffering to animals. Those involved in IWT and wildlife criminality can also be linked to other serious and/or organised criminality.

It is becoming increasingly difficult for law enforcement to disrupt, combat and respond to the current risks and threats of wildlife crime in the UK, including international links, due to multiple factors. ***Resource availability*** to tackle wildlife crime is inconsistent across the UK and varies force to force. Police ***budgets*** are becoming ever increasingly more challenging, police are required to make efficiency savings leading to gaps in ***funding***. This means wildlife crime investigations must compete against other policing priorities. ***Data capture*** is an ongoing issue, because most wildlife crimes are not recordable nor notifiable. Capacity and capability issues also exist in the ***CPS*** which create case backlogs and reduce disruptive outcomes**.** To effectively tackle wildlife crime, ***dedicated long-term resources*** are required, whilst balancing conflicting priorities, reduced budgets and limited resources. ***Consistent and accurate data*** is required to analyse wildlife crime and make data-driven decisions.

Wildlife crime is a crime like any other and must be reported, recorded and investigated appropriately utilising the current legislation to bring offenders to justice and to protect wildlife for future generations. There is a wide ***community*** and ***public interest*** in the environment but funding to tackle wildlife crime and the protections in place from legislation and sentencing is not reflective. Wildlife crime investigations can be ***complex*** and ***resource intensive***, requiring partner assistance and the use of specialists or subject matter experts. There is a need for ***change in legislation*** and guidance for wildlife crimes as the current situation is complex, outdated and requires streamlining and review.

The UK Government is subject to international obligations to ensure wildlife crime is effectively investigated. Tacking wildlife crime cannot be done by law enforcement alone, therefore it is necessary to have a ***co-ordinated*** and ***multi-agency approach*** by working with relevant partners. This is especially true for the illegal wildlife trade which crosses borders and continents.

[1] Crackdown on illegal wildlife products at the border - GOV.UK

Aims & Objectives

The main aim of this document is to provide a strategic overview of the current picture of wildlife crime in the UK since the last assessment in 2022. This informs the UK Tasking & Co-ordination Group (UKTCG) as to the current threats, risks, concerns and emerging issues. This will aid the decision-making process with recommendations for consideration to tackle and disrupt wildlife crime. The UKTCG ratifies the areas to become national wildlife crime priorities for the 2025-2029 strategic period. The objectives are to:

- Prioritise the most important wildlife crime issues impacting the UK based on threat, risk and harm. MoRiLE (Management of Risk in Law Enforcement) is used to assess wildlife crime issues consistently.
- Review and assess the current wildlife crime priority areas to understand the present threat and assess if they are to remain a priority.
- Assess other non-priority wildlife crime areas for consideration to raise as a priority.
- Ensure stakeholder and partnership input is integrated within the assessment process utilising the knowledge and experience of subject matter experts.

Horizon Scanning

The following themes and issues have been identified as significantly impactful on the UKs ability to tackle wildlife crime now and in the future. The following PESTELO framework factors are highlighted to correspond to the issue discussed:

Political	Economic	Social	Technological	Environmental	Legal	Organisational

New UK Government

Political	Economic	Social	Technological	Environmental	Legal	Organisational

A change in UK government from Conservative to Labour in July 2024 has and will result in policy change. In their election manifesto[2] the Labour party made commitments to protect landscapes and wildlife, promote nature recovery, meet the targets in the Environment Act, build sustainable homes that support biodiversity, and improve access to nature. They have also committed to ban trail hunting and introduce a ban on import of hunting trophies. These are just a few policy changes identified that are likely to have an impact on how wildlife crime is tackled under the new government. The government also plan to overhaul the regulatory system to support growth, so it is targeted, proportionate, transparent and predictable and adapts to keep pace with innovation.[3] However, there are concerns wildlife and the environment will lose out to economic development.



[2] Change-Labour-Party-Manifesto-2024-large-print.pdf

[3] Government publishes new approach to ensure regulators and regulation support growth, including removing reference to the BCT Guidelines | CIEEM, New approach to ensure regulators and regulation support growth (HTML) - GOV.UK and Labour's great nature sellout is the worst attack on England's ecosystems I've seen in my lifetime | George Monbiot | The Guardian

Changes to ministers and budgets will also impact upon how current, new and emerging issues and priorities can be progressed. There are risks that cuts within the civil service will impact across various departments and agencies that have an input to tackling wildlife crime.

Recommendation Ensure positive changes to tackle wildlife crime are progressed and government are supported to enact these changes.

Exotic Pet Trade Demand and Risks

Political	Economic	Social	Technological	Environmental	Legal	Organisational



Ease of travel and online communication methods have facilitated and increased the exotic pet trade that was once a preserve only for the wealthy. The supply and demand for various species (mainly parrots and reptiles) will result in offenders profiting by exploiting wildlife. This can occur at any stage in the import/export chain – species taken from wild to supply demand, false documents used, misrepresentation occurs or there is a total lack of documentation. There are biosecurity risks (i.e. diseases) when bringing species into the UK. This highlights the risk of zoonotic diseases associated to the illegal wildlife trade and increased awareness since the Covid-19 pandemic.

Recommendation Increase understanding of the exotic pet trade within the UK.

Concern for Environmental & Wildlife Issues

Political	Economic	Social	Technological	Environmental	Legal	Organisational



There has been a seismic shift in public awareness of environmental issues due to climate change and global warming. There is considerable concern related to habitat loss and the associated risk of species becoming extinct. On top of these pressures, humans also exploit wildlife through trade or they kill and injure animals for 'thrill'. There is public anger wildlife is being exploited in this way and a recognition that it needs to be protected from offenders for future generations. Invasive Non Native Species (INNS) threaten native flora and fauna by out-competing native species and bringing a risk of zoonotic disease transmission.

Recommendation Raising the profile of wildlife crime including public knowledge and understanding of what constitutes wildlife crime and how this can be reported.

Online Shift

Political	Economic	Social	Technological	Environmental	Legal	Organisational



Modern society is increasingly shifting towards more online activity, and this is facilitated by technological advances and the internet of things (IoT). Wildlife offenders, like other criminals, utilise technology to facilitate communication and trade. Certain Apps are used by groups with common interests or as a marketplace. Communication and posting of images and videos occurs across social media. Wildlife crime activity is commonly done over the 'open' web where it is not policed. The extent of activity cannot be established. The use of technology and online aspect to wildlife crime is increasing and law enforcement is unable to keep up with the pace of change. Cyber enabled wildlife crime is a very real and increasing threat and is observed across most wildlife crime types.

Recommendations

- Ensuring law enforcement is digitally forensically aware to maximise opportunities to bring offenders of wildlife crimes to justice.

UK/EU/World Relationships

Political	Economic	Social	Technological	Environmental	Legal	Organisational



The UKs relationship with the EU has gone through significant change since Brexit. There are border threats and risks related to trade where processes are exploited by criminals. This is especially true between the Northern Ireland/Republic of Ireland border. Criminals will adapt and continue to exploit vulnerabilities at the border. This is especially of note for the illegal wildlife trade.

There is also a shift in world power from the USA to China and other emerging economies away from the west. The USA has applied increased tariffs on international trade in 2025 and this will impact upon global trade. It is unclear how this change will impact upon the illegal wildlife trade, but the shift is likely to have significant societal ramifications.

Resources to Tackle Wildlife Crime

Political	Economic	Social	Technological	Environmental	Legal	Organisational

Wildlife crime is not a priority issue within the UK, nor is it a priority issue for most forces. Funding is therefore scarce and hard fought. NWCU funding is an annual challenge. Every police force is set up differently and the roles and responsibilities for Police Wildlife Crime Officers (PWCOs) vary. Some forces are removing dedicated wildlife crime capability or will not investigate wildlife crime as is deemed 'victimless'. Few officers dedicated to tackling wildlife crime are full time and, for most, it is an 'ad-on' to their main operational role. There is a high attrition rate of PWCOs which can result in knowledge and skills gaps within forces. Many PWCOs sit within rural crime teams and wildlife crime is just a small aspect of their remit.



Competing demands put pressure on a PWCOs ability to investigate wildlife crime. Similar resource issues are present across civil service agencies, border force and the CPS and this has continued knock on effects for wildlife crime enforcement. A lack of capacity leads to problems in collecting evidence and consistency in preparing cases for prosecution.[4]

Recommendations

- Long term funding to be established for tackling and investigating wildlife crime.
- Increased consistency and dedicated resources to investigate and tackle wildlife crime across the UK.

Legislation

Political	Economic	Social	Technological	Environmental	Legal	Organisational



Current legislation is inconsistent, complex and, in some cases, outdated and in need of review. The lack of sentencing guidelines results in inconsistent outcomes. Wildlife crime is seen as a low-risk, high reward activity due to the low-level and inconsistent penalties applied to offenders. Currently hare coursing sentencing is at consultation phase[5] and there is a COTES reform process ongoing but there is a need for more concise wildlife legislation and sentencing reviews.

Recommendation Review and update wildlife crime legislation and associated sentencing guidelines.



[4] Wildlife criminals 'getting away with it' – new study - ARU
[5] Hare coursing sentencing guidelines – consultation – Sentencing

2025-2029 Wildlife Crime Priorities

NWCU assessed over 20 thematic crime areas using MoRiLE to inform this Strategic Assessment. The Wildlife Crime Conservation Advisory Group (WCCAG) scoring methodology for conservation issues has been used to inform MoRiLE. The following 10 wildlife crime themes scored as the highest for threat, risk and harm (further wildlife crime issues scores can be found in the appendix).

HIGHEST RISK WILDLIFE CRIME THEMES - MoRiLE

Bat Crime		**CITES Illegal Parrot Trade (IWT)**	
Badger Crime		**Deer Poaching**	
Bird of Prey Crime		**Fish Poaching**	
CITES Illegal Bird of Prey Trade (IWT)		**Hare Coursing**	
CITES Illegal European eel Trade (IWT)		**Illegal Hunting with Hounds**	

These issues are reflected in five wildlife crime priorities:

1. Badger Crime
2. Bat Crime
3. Bird of Prey Crime
4. Illegal Hunting, Poaching & Coursing
5. Illegal Wildlife Trade (CITES)

Of note is that the Illegal Hunting, Poaching & Coursing priority would be split into two delivery groups to tackle both the established Poaching and Hare Coursing PDG and a new PDG which will focus on Illegal Hunting with Hounds. Most priorities have remained the same since the last strategic assessment, however, there are some significant changes, as detailed overleaf:



Illegal Hunting with Hounds (HwH)



Illegal hunting with hounds has been of concern for many years and there is a current Working Group which focuses on the issue. Illegal Hunting with Hounds scores highly on MoRiLE highlighting critical organisational risk factors. It is a very polarised subject with significant community impacts and elements of violence committed by both sides. Tackling the issue can be resource intensive for forces and investigations can be complex. They require knowledge of how hunts operate, a need for expert witness testimony plus a high evidential threshold is needed to get cases to court. There are loopholes in the current legislation which offenders are exploiting. A large proportion of the policing response does not concern wildlife directly but does stem from the hunting of wild mammals including fox, mink and hare. *Further details are in the Illegal hunting with hounds section later in the report.*

Recommendation Current Working Group to be escalated into a PDG to tackle the issues of illegal hunting with hounds under a 4P plan[6] including legislation and police response.[7]

[6] Protect, Pursue, Prevent & Prepare

[7] Legislation differs in Scotland and in Northern Ireland as devolved nations. Delivery group will cover England & Wales.

Illegal Wildlife Trade (IWT) & CITES



In the 2022 strategic assessment there were 6 CITES sub-priorities[8]. These were reviewed as part of the Illegal Wildlife Trade Threat Assessment which identified Parrot trade, Bird of Prey trade & European eel trade as the key CITES issues. These were ratified at the UKTCG in 2024 as the key CITES priorities to focus on. A range of CITES issues have been independently scored with MoRiLE assessments indicating these same three issues should be prioritised due to their harm and organisational risk scores. The police and NWCU will continue to investigate reports of CITES outside these three issues.

Recommendation CITES PDG to remain with focus on three priorities – illegal trade in Parrots, Birds of Prey and European eel. It should also continue to assess other CITES concerns and emerging issues.

Freshwater Pearl Mussels (FWPM)



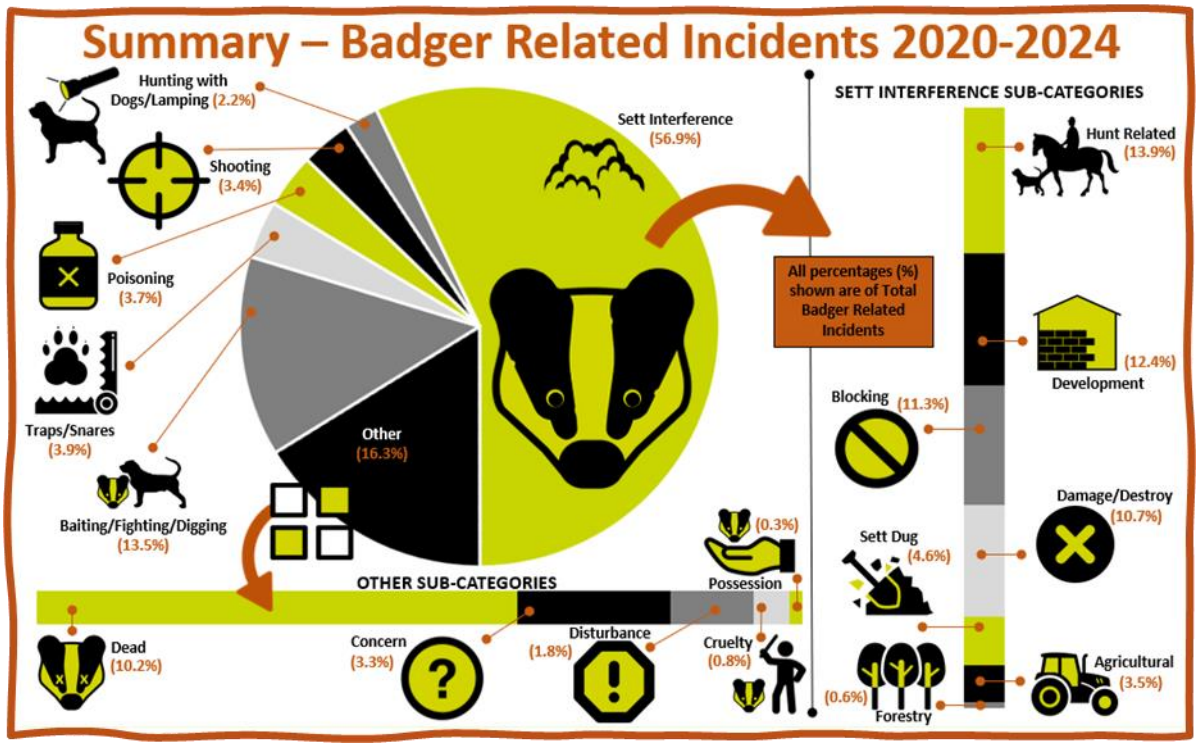
FWPM were first identified in 2003 as a conservation priority via the WCCAG. The current MoRiLE assessment shows FWPM have the lowest risk score of all the priorities. This is due to the lack of physical, psychological or financial impact of offending on humans, and that there is no observed community impact. FWPM populations are kept confidential and FWPM crime is not a pervasive issue in the public conscience. However, it is recognised that when incidents occur the impact on these critically endangered species can be significant with a risk of wiping a whole population out in a specific locale. The volume of reported incidents is very low with just a handful of cases over the last few years, most relate to the effects of development/engineering works carried out rather than specific targeting of FWPM. The MoRiLE organisational risk score is low, indicating there is capacity and capability to tackle the threat when incidents are reported. Although FWPM would no longer be a priority wildlife crime issue, there is still a recognised duty for police to investigate any future crime. Crimes will still be addressed and NWCU will provide guidance and assistance.

Recommendation Members of the current FWPM PDG to consider meeting as a Working Group to ensure subject matter expertise continues to be considered. The group should utilise the 4P Plan process.

[8] NWCU Strategic Assessment 2022: CITES Sub-Priorities: European Eel, Reptiles, Ivory, Timber, Illegal trade in Raptors and Beauty, Health and Medicines

Badger Crime

Badgers remain one of the most persecuted mammals in the UK. Analysis[9] of incident data indicates sett interference remains the most significant issue for badgers accounting for 56.9% of incidents (see Infographic below for full breakdown). Hunt related and development represent 13.9% and 12.4% respectively of the total and are the most notable issues under sett interference where individuals or groups are identified. Incidents recorded as blocking, damage/destroyed or sett dug could also be related to these groups. This means hunt related and development is likely underrepresented. This data does not represent the full picture as there remains an element of underreporting and under recording.



Development is a consistent theme and has become more noteworthy since a peak in 2020. Development is linked to a wide range of activities at different scales from individuals to large operations within the construction industry, council works and infrastructure upgrades. Development is likely to remain a significant issue of concern due to the need to build more homes in the UK and the government plans to meet this demand. This will maintain the continued conflict between badgers and humans and the risks of loss of badger habitat for developments.

Hunt related activity is detailed more in the Illegal hunting with hounds section, but there is a strong link with badger sett interference and blocking. This is specifically associated to fox hunting as individuals such as terriermen block setts prior to a hunt or cause damage by digging if quarry goes to ground. These can be identified by police if called to an incident or reported by local badger groups highlighting the importance of reporting to the police and to partner agencies.

Baiting, fighting and digging for badgers concerns 13.5% of incidents and has increased in proportion since the inclusion of data from Scotland and Northern Ireland. These violent activities - along with lamping and hunting with dogs - are committed by groups of men with common interests, with some breeding fighting dogs for baiting. Some post videos of the activity

[9] Badger Related Incident Analysis 2020-2024. Police and partner data.

on social media to brag about the number of kills or their dog's status. It is difficult to know the scale of offending and to monitor online activity. However, online activity can provide strong evidence to bring offenders to justice and this can also highlight animal welfare issues. Dogs used in these activities commonly have facial injuries (i.e. degloving) and owners do not seek necessary veterinary treatment and instead provide their own medical assistance, this can include the use of staples and glue.

There have been children present at these violent incidents, exposing them to activities of badger baiting at a young age and desensitising them to extreme violence. There are obvious safeguarding concerns, and the children exposed to these activities are likely to be future offenders. There is a strong link between badger baiters and domestic violence/abuse, with many associated to acts against partners, ex-partners, family members and children.[10]



Evidential material from social media can assist with building a strong case against offenders, this can come from comprehensive intel packages from partner agencies. Other evidence may be required to support a case, this may include forensics and can add to the complexity of the case. Experts may be required for DNA, blood analysis, postmortem or X-ray to determine cause of death. If poisons are a contributing factor, then submission into the WIIS scheme may be necessary. The consideration and use of expert witnesses can be necessary to determine if a sett is active. Ecological reports can support development cases to identify if mitigation processes were followed and if works carried out considered the presence of an active badger sett.

Emerging Issues

Some partner agencies have reported a shift to more incidents being reported directly to police. This can potentially be seen as positive as more information and crimes are reported, with fewer duplicate reports across agency and police datasets. However, this may not be reflected in the PND data as not all records are Home Office notifiable.

Carcass left at the roadside to suggest a badger has been involved in an RTC have increased in volume in 2025. This is believed to be an MO used to try and disguise criminality, although this is not a new MO. Some badger carcasses have indications of violence due to the presences of injuries such as cuts, snares attached, bound limbs and bullet entry/exit wounds. Not all badgers found at the roadside will be linked to criminality. However, there is concern not all those that are criminal are identified as such, carcasses can be removed before police notification, so no assessment takes place. Others will not be properly examined (i.e. postmortem or X-ray), due to limits in capability, suspicion or budgets, resulting in missed opportunities. Decisions need to be weighed against realistic probability of a result i.e. where there are no lines of enquiry for suspect identification against costs of testing.



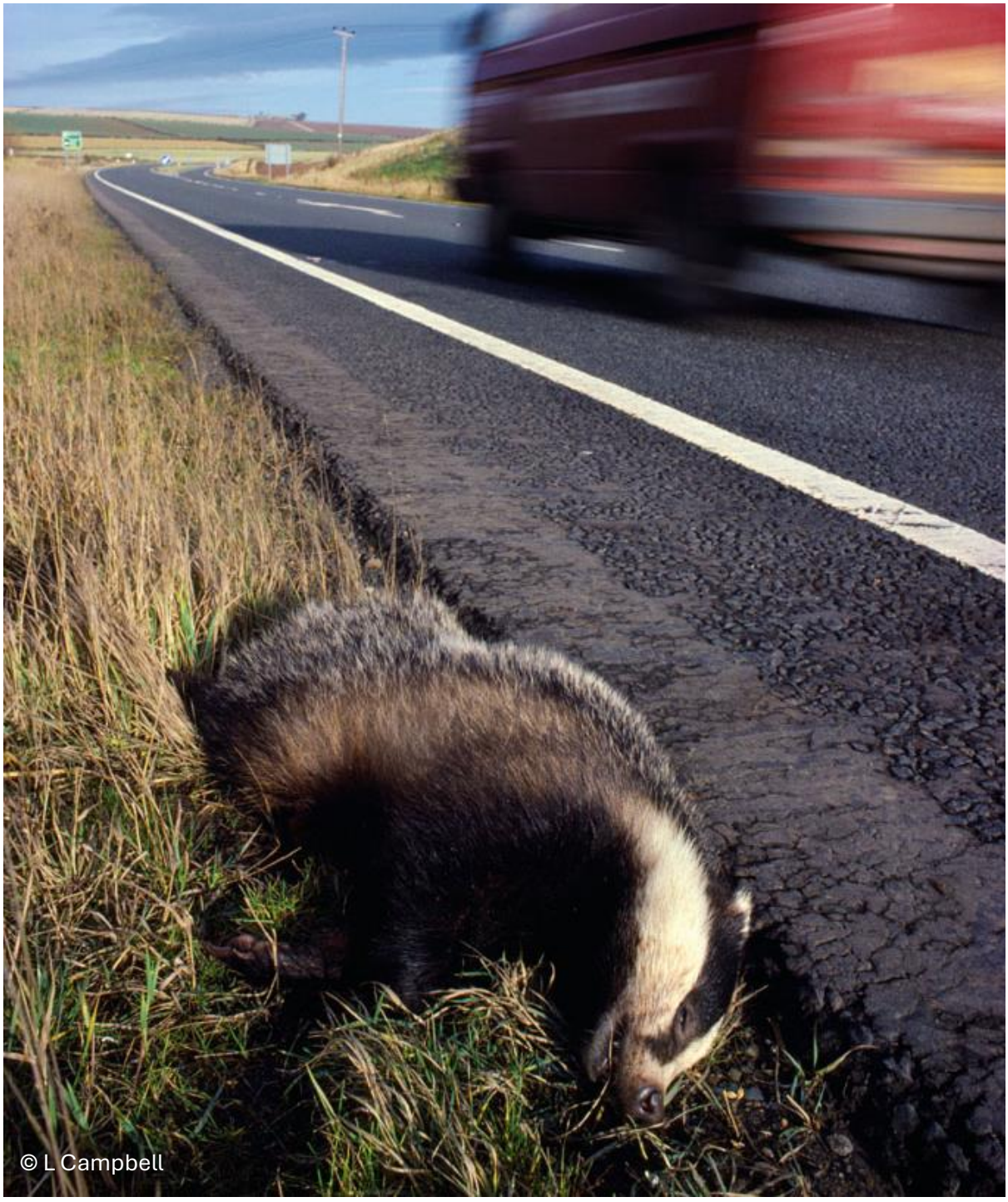
[10] NWCU Badger Baiting NOIs

Intelligence Gaps

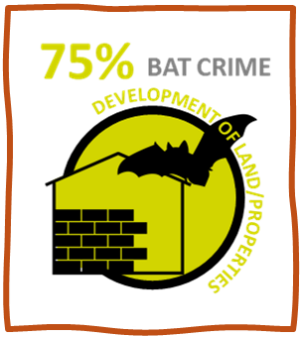
- Analysis of badger data is not representative of the full picture. Ensuring the public know what badger crime is and how to report incidents will continue to enhance the national picture.

Recommendations

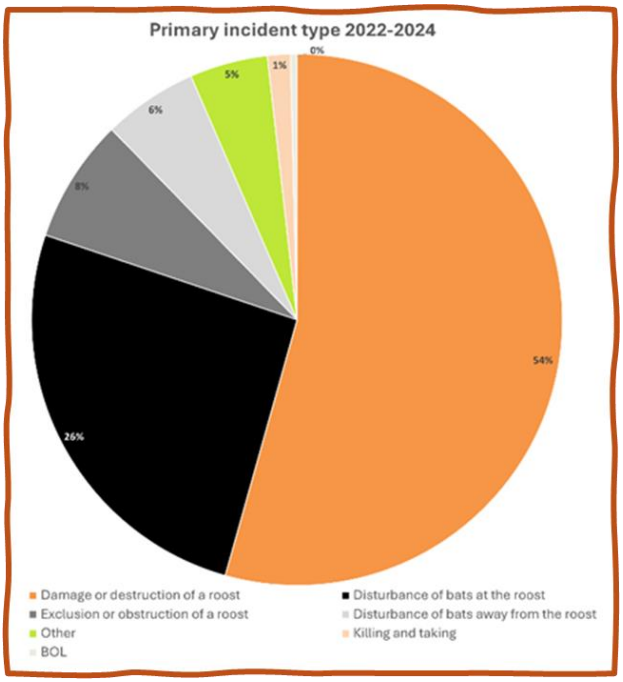
- Make badger crimes Home Office notifiable.
- Continue to raise awareness of badger crime including reporting incidents and crimes.



Bat Crime



Bat crime refers to illegal activities that harm bats or their roosts - vital habitats where bats breed and rest. The WCCAG identify the risk criminality poses to bats because of their declining numbers, loss of habitat and ecological importance. The spaces bats use to rest and breed make them particularly vulnerable to habitat loss. The majority of offences against bats occur in association with the development, maintenance, and modification of buildings.



In the last three years there were 504 bat related incidents in the UK, primarily development related. Damage/destruction of roosts, disturbance of bats and exclusion/obstruction of roosts account for the majority of incidents (see chart). Offences arise out of ignorance of regulations and deliberate actions where individuals or businesses look to make financial gains and time savings. There are also cases where planning authorities were involved, but crimes occurred as a result of compliance failures.

There have been several significant cases in recent years involving the damage/ destruction of ecologically important maternity roosts. These incidents can wipe out bat populations in an area and take years for numbers to recover. Police and partners have also responded to incidents involving multiple protected species, for example, land clearance which destroys the habitat of bats and great crested newts.

Emerging Issues

In this strategic period the crime landscape has not changed dramatically, although there are several new issues which have emerged.



Urban explorers – content creators and social media influencers have popularised “urban exploring” which is a trend for exploring abandoned buildings and underground hideaways. These locations can contain bat roosts and there have been incidents in recent years where bats have

been illegally disturbed. Online scanning indicates that this activity is happening across the UK in a variety of places including mines, caves and disused buildings[11].

LPAs – there are several recent examples where offences have been committed despite the involvement of Local Planning Authorities (LPAs). LPAs have statutory obligations regarding nature conservation and planning decisions may be subject to judicial review if statutory obligations are not fulfilled. There are 337 LPAs in the UK. The Bat Crime PDG has developed advice material to encourage LPAs to cooperate with law enforcement where issues are identified.



Bats as pets – NGO partners have highlighted an increasing number of enquiries regarding live specimens of fruit bats being offered for sale. Although there have only been a small number of reports, these incidents typically require a response from multiple agencies including police, local authorities and Bat Conservation Trust (BCT). Most species being traded are not CITES listed, but the potential transmission of zoonotic disease raises the risk. The Bat Conservation Trust has produced a guidance document relating to bats in trade to prepare agencies to deal with this emerging issue.

Intelligence Gaps

- Incident data capture issues make it more challenging to identify trends and crime hotspots. it is not mandatory for police forces to record bat crime. Therefore, the Priority Delivery Group has relied on BCT to collate annual incident statistics since 2010. In 2022, there was a decrease in the number of bat incidents in the UK according to national statistics collated by BCT. There were only 84 incidents in 2022 - the lowest figure seen in a decade. A comparative analysis (using force returns and PND data) was conducted by NWCU which identified that a large proportion of incidents were not coming to the attention of BCT. The analysis methodology was updated so that data from BCT, PND *and* force returns are utilised. However, it is likely that a significant proportion of bat incidents are not captured as under half of forces replied to the data request in 2023 and 2024 and not all forces upload wildlife crime information onto PND.

Recommendations

- Continue to develop bat incident dataset in lieu of bat crime being made recordable by the Home Office.

[11] Bat Conservation Trust 2021

Bird of Prey Crime

Bird of prey crime involves the illegal persecution of raptor species through poisoning, shooting, trapping, nest destruction and harassment. Operation OWL is the national operation tackling this issue. Despite legal protection and decades of investment in their conservation, birds of prey are still targeted by offenders who feel the presence of raptors conflicts with their business interests or hobbies. The majority of incidents are associated with land managed for game bird shooting, particularly upland grouse shoots and lowland pheasant and partridge shoots. There have also been recent investigations involving pigeon fanciers and agricultural businesses.

The WCCAG assessed hen harriers as the most at-risk species in the UK[12]. Golden eagle, white-tailed eagle, peregrine and goshawk populations are also threatened by criminal activity. Incident data and intelligence highlight that birds of prey are being targeted year-round across the UK and illegal activity constrains the recovery of wild bird populations[13]. However, cases rarely reach court and convictions are low, because crimes often occur in remote locations on privately owned land where evidential opportunities are limited.

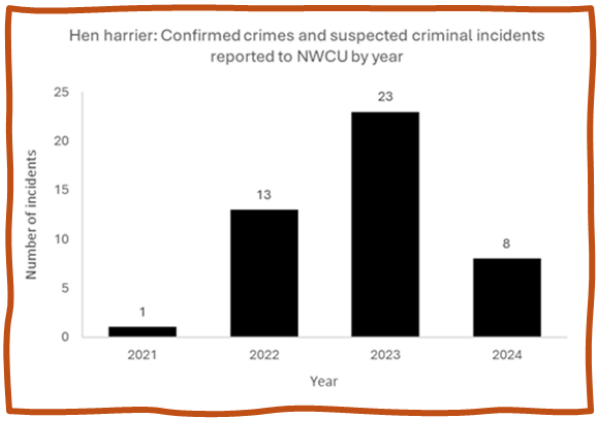
The NWCU have used a data-led analytical approach and harnessed technology to tackle bird of prey crime in the 2022-2025 strategic cycle. Satellite tagging has increased understanding of the ecology of birds of prey and also shed light on illegal killing and suspicious disappearances of hen harriers, golden eagles and white-tailed eagles. The Hen Harrier Task Force uses satellite tag data to map crime hotspots and target prevention work in the highest risk locations. This data-led approach enables police to focus resources and build relationships with key landowners and land users in crime hotspots. The NWCU have also invested in detection dogs and drones which have been deployed on searches to improve crime detection and evidence recovery.



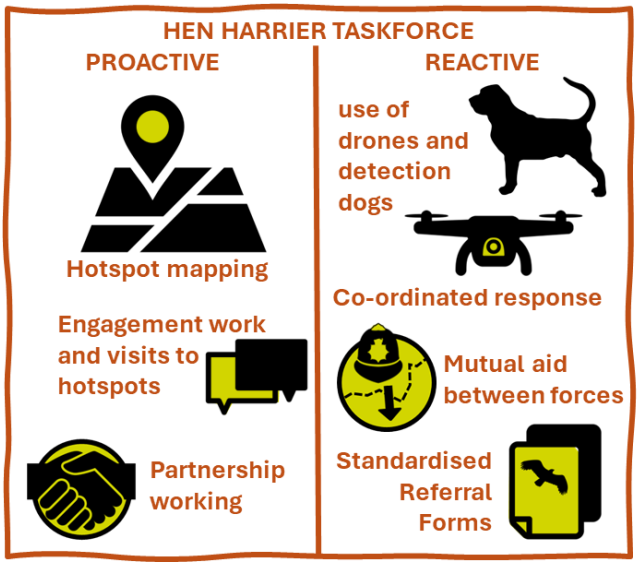
[12] WCCAG 2025

[13] Killing of raptors on grouse moors: evidence and effects - Newton - 2021

Emerging Issues



Satellite tagged bird reports – the NWCU has received an increasing number of reports in relation to the disappearances of satellite tagged birds, particularly hen harriers, in this strategic period. The chart shows the increase in reports received. In addition to wildlife crime offences, there are also issues with theft and criminal damage of satellite tags. Hen harriers are fitted with tags which cost in the region of £2,800. Over £100,000 worth of tags have been lost in suspicious circumstances (between 2022 and 2025). In response, NWCU and partners formed the Hen Harrier Taskforce in 2024 to prevent criminality and improve detection of crime and evidence recovery. The project has been a success in terms of crime reduction in the short term but highlighted the need for a long-term solution and culture change with regards to this deep-rooted human-wildlife conflict.



Avian influenza - Annual outbreaks of avian influenza (AI) have necessitated increased bio-security measures. To protect government staff, AI tests have been required before any bird carcase can be submitted into the WIIS scheme. Fewer birds have been submitted into the WIIS scheme as a result - all carcases were destroyed following positive AI test results, and some carcases were disposed of rather than submitted to WIIS after negative AI test results.

This raises the possibility that instances of illegal killing (i.e. due to poisoning) have not been detected.

Re-introduction related conflict - There are several re-introduction projects planned across the UK for hen harriers and white-tailed sea eagles which will be implemented in the next few years. These re-introduction projects will see species re-establish in parts of the UK where they have been absent from for decades. This raises potential for conflict and crime in new areas which police and partners must be prepared to respond to.

Intelligence Gaps

- Satellite tagging has improved understanding of how criminal activity impacts hen harriers, golden eagles and white-tailed eagles. Other species are not routinely satellite tagged, therefore, it is more challenging to identify crime hotspots for untagged birds.
- Intelligence submissions regarding offenders and criminal activity are relatively low, therefore, when suspicious incidents or crimes occur there can be very limited opportunities for intelligence development.

Recommendations

- Develop hotspot mapping for other high-risk bird of prey species.
- Build on success of Hen Harrier Taskforce and continue preventative approach.
- NWCU to work with partner agencies to develop long-term solutions for human-wildlife conflict issues.



Illegal Hunting with Hounds (HwH)

Illegal hunt related activity associated with hounds is a multi-faceted issue due to the different groups involved and impacted. This includes, but is not limited to, the hunts, police, saboteurs, hunt monitors, landowners, and the public and local communities who are impacted by the activity. Although fox hunting is the focus there are other target species such as hare and mink. This has been a divisive and political issue for some time with pro and anti-hunt sides and this has continued since the Hunting Act 2004 was brought in.

The main issue concerns the practice of ***'trail hunting'*** where incidents indicate trail hunting is being used as a ***'smokescreen'*** by hunts to continue to fox hunt. This was evidenced in leaked training webinars. Anti hunt consensus indicates trail hunts do not follow guidelines and this results in increased risk to and death of wildlife. This is evidenced in reported incidents and convictions. The very existence of anti-hunt groups is a strong indicator there is an issue with how hunts operate. Both National Trust and Ministry of Defence have applied restrictions on hunts on the use of their land.[14]



Accidentally killing a fox or other wildlife happens all too frequently, as does not calling off hounds or encouraging hounds – both are indications of illegal hunting. Out of control hounds, 'temporary lapse' in judgement and use of lawful exemptions are used by hunts as an excuse to illegally hunt.

There is a direct link and cross over with badger crime due to sett interference associated to hunt activity. This activity is commonly associated to terriermen and represents the largest proportion of sett interference where a known group is identified.

There is an element of underreporting. Only a few cases get to court and result in conviction, those that do are just the tip of the iceberg. Penalties are not sufficient to be a deterrent.

Different tactics are employed by either side that increase tension - common themes are threats, intimidation and violence. Filming and use of drones increases tension between opposing groups and posting to social media highlights the division of opinion. Trespass on land is a common feature for both pro-hunt and anti-hunt groups. Offenders on both sides may cover their faces to disguise their identity and this inhibits law enforcement's ability to progress if suspects cannot be identified. Targeting kennels and kennel staff is an intimidation tactic that has been used by anti-hunt groups. The use of citronella/spray is a tactic used by anti-hunt groups to mask animal scent, this can cause dogs used in hunts to become out of control and distracted.

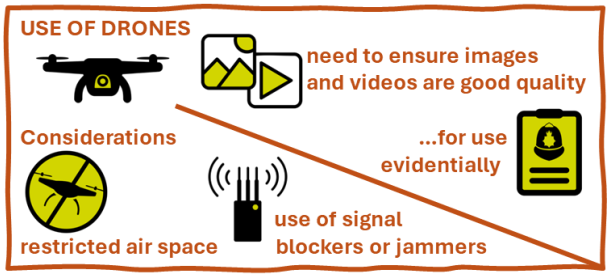
Although this is primarily a wildlife crime issue, it is noted that a large proportion of criminality associated to hunting with hounds is linked to and generated by the conflict and tension between the opposing groups - which manifests as ASB, criminal damage and violent crime including serious injury.

[14] National Trust's position on trail hunting | National Trust, Eleven trail hunts blocked from MoD land as Government eyes ban (telegraph.co.uk)

Hunt related activity is complex and there can be a lack of understanding for non-wildlife/rural crime officers responding to incidents. Police capacity and capability varies across the UK as does the presence and rank of a force lead. This means deployment and engagement with the opposing groups differs significantly across the UK. There are difficulties obtaining and securing evidence of criminal activity and this can impact upon case progression. Police investigate both sides of the polarised issue for different offences both for suspects and victims and these previous interactions can impact upon future engagement.

Emerging Issues

There are indications several hunts have merged or disbanded in recent years, there are likely to be many factors linked to these decisions. These may include the increased pressure and anti-hunt sentiment, the result of convictions of hunt members and the necessary rebranding to separate the Hunt (of which many are registered Limited companies) from negative associations.



The use of drones by both pro and anti-hunt groups can be useful evidentially, however sometimes footage can be poor and the identification of suspects not possible. Consideration needs to be made of any offences linked to drone usage or anti-drone equipment such as flying in restricted areas or breach of drone law by endangering. There are however concerns with the use of drones with the example of a tethered drone used to take another out.[15] Signal blockers and jammers have previously been used in incidents linked to hunt activity.[16]

Intelligence Gaps

- The true picture of hunting offences is likely to be higher and the wildlife crime aspect is overshadowed by the volume of non-wildlife criminality linked to the opposing groups.

Recommendations

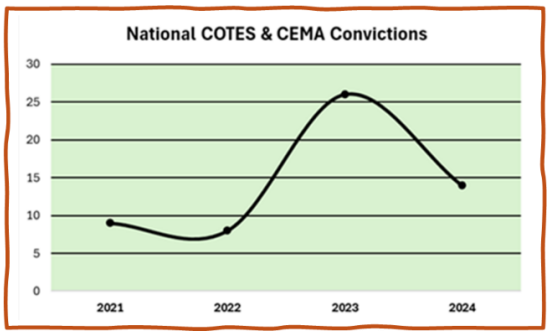
- Priority Delivery Group (PDG) to be formed to tackle this issue with a chair appointed, membership agreed and 4P Plan set in line with other PDGs[17]. The Hunting with Hounds Working Group to cease.
- Review of the current legislation and sentencing guidelines for hunt related offences.
- Review of national guidance as to how police forces should proactively and reactively tackle hunt related activity.
- Increase reporting and recording of hunt related incidents and increase the quality of evidence obtained to ensure greatest success when prosecuting offenders.

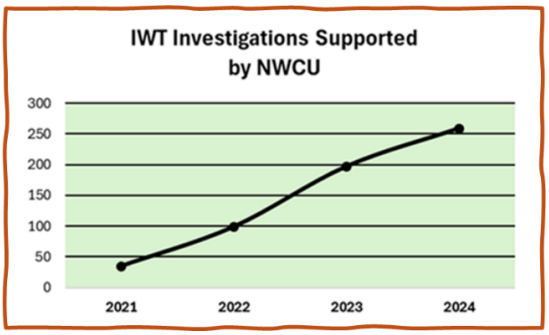
[15] Beaufort Hunt Heighten Drone Wars In Premeditated Attack - Hunt Saboteurs Association
[16] Hunting with Hounds Working Group
[17] Legislation differs in Scotland and in Northern Ireland as devolved nations and delivery group likely to just cover England & Wales.

Illegal Wildlife Trade (CITES)

Intelligence over the last three years has seen an overall increase, an improvement in data quality and has highlighted a stronger engagement with partnership agencies.

IWT investigations and operations supported by the NWCU has grown year on year, rising from 35 to 259 cases per year over the last four years. The involvement within the investigations has led to a greater understanding of the illegal wildlife trade.





Whilst conviction levels remain relatively low, this may be indicative of the fact that CITES and CEMA offences, although notifiable, are not a current priority for Police forces or CPS and do not fully reflect the disruptive activity undertaken. It is acknowledged that early engagement with CPS is crucial for the prosecution process, however this is hampered by competing priorities and workloads. There is currently no wildlife crime strategic lead within CPS so continued drive and coordination is restricted.

Where convictions have been successful, penalties are typically light, with custodial sentences less likely. An aggravating factor is the lack of understanding around COTES & CEMA offences. There are currently no sentencing guidelines for IWT.

Although UK is primarily a demand country, we do also see UK native species being illegally traded. In respect of seizures at the border, 2024 saw the highest levels since 2021, following a dip during 2023 (both for imports and exports).

There are still significant knowledge gaps surrounding source countries and transit, which is intensified by the fact that overseas offenders and network hierarchies remain largely unknown. A common theme surrounding those identified within IWT is that nominals have an extremely limited policing footprint.

Although IWT is linked to online marketing platforms the true scale of this is yet to be determined (discussed further under the enablers section).



There are numerous different themes that fall under the CITES umbrella, all of which present their own unique issues and threats. To ensure that all are assessed appropriately, key themes have been looked at in isolation in order to identify the most prominent risks.

MoRiLE scoring has been used to ensure consistency. However, the categories don't fully capture or address all the risks associated with the illegal wildlife trade. Therefore, the NWCU has created more in-depth guidance to ensure that links to multiple countries, corruption, links to further Serious Organised crime, including terrorism and biosecurity are recorded and assessed. This guidance will be shared with the NCA, in the hope that it will be weaved into their official MoRiLE guidance criteria.

It is crucial that the threat of zoonotic diseases is examined during risk assessments, the Covid-19 pandemic illustrated the severe risk that illegal wildlife trade may pose in the spread of disease. The illegal trade provides an opportunity for the emergence and evolution of new diseases with potential transmission between animals and humans in close proximity, as well as pathogens being exchanged between species.

Illegal Parrot trade – Key Priority



Following an increase of incoming CITES parrot seizures by UK Border force, the illegal trade in parrots was identified and raised as an emerging issue in 2023.

Intelligence development around individuals linked to the illegal trade led to the identification and mapping of 3 separate organised crime groups.

A prominent risk identified is that a high proportion of illegally imported birds have either died or been euthanised because they are in a poor state of health. Beak and feather disease and other unidentified diseases have been seen within seizures. This inevitably poses several implications if diseases are passed on to UK native birds and potentially humans.

CITES Birds of Prey – Key Priority



The illegal trade in birds of prey primarily surrounds, but is not exclusive to, live peregrine falcons. The illegal trade is primarily achieved via concealment within legitimate markets. This is an extremely niche area of crime; it is undetermined how much offenders are aware of law enforcement procedures.

Although independent investigations are beginning to illustrate hierarchy chains, there are still significant gaps around identifying potential networks. One OCG was successfully dismantled through a positive prosecution, including a Proceeds of Crime Act (POCA) investigation.

Due to the complexities of the illicit and legitimate trade and the sheer volume of birds potentially being illegally traded, a combination of staff resources and increased DNA testing is crucial to identifying criminality.

CITES European Eel – Key Priority

Globally the illegal trade of European eels continues to be an extremely lucrative business and is estimated to be worth around £2.5 billion annually.

European eels are predominantly fished from 4 main countries: Spain, Portugal, France and the UK.



There have been proposals to list all species of eels on Appendix II of CITES as well as muted suggestions that European eel is listed under Appendix I. If either of these proposals were successful, they could potentially have implications on the illegal trade within the UK.

CITES Reptiles

There are two main themes within the illegal reptile trade: live specimens and parts and derivatives. Both crimes are committed in very different ways, highlight different risks and are primarily committed by different offenders.

At the border, parts and derivatives, namely reptilian fashion goods, account for the highest proportion of seizures. Whereas policing intelligence suggests that illegal trade of live reptiles is more common.

Italy continues to be identified as the most prominent country of export for fashion goods. There are significant intelligence gaps around source and exportation countries for live species.

Alligator and crocodile products continue to be the most common species seen within border seizures. The number of live species illegally traded varies significantly, and therefore no single prominent species can be identified.

CITES Plants

CITES plant seizures saw a significant rise during 2024, highlighting them as a prominent issue at the border. An aggravating factor is changes in processes following the UK leaving the EU. Intelligence has highlighted a combination of issues surrounding non-compliance, but also more deliberate criminality with some nominals purposefully misdeclaring plant species as other products. Where lack of knowledge/non-compliance has been identified, partnership work between APHA and UKBF was conducted to deliver educational guidance to traders as opposed to seeking prosecutions.

However online development and seizures indicate the demand within the UK is evident and further work needs to be made to determine the true scale.

The WCCAG has identified ornamental plants as a priority and are currently monitoring carnivorous plants. The scale of trade currently remains unknown and is being monitored by Kew as new species are being discovered.

CITES Ivory

The illegal trade in ivory has seen an overall decrease since the implementation of the 2018 Ivory Act in 2022. Intelligence and seizures highlight that where illegally traded ivory has been identified; products primarily relate to small carved trinket items. Seizures relating to tusks are extremely low.

Although the internet continues to be highlighted as a common method of advertising and distributing ivory, the online picture appears to be significantly lower than levels seen prior to the Ivory Act 2018.

On 28/01/2025 an extension of the Ivory Act came into force. It is now illegal to deal in items made of or containing ivory from the species shown below without a valid registration or exemption certificate:



It is anticipated that the additions to the Ivory Act will result in an initial rise of seizures and offences.

CITES Health, Beauty & Medicines

Flora and fauna species continue to be seen within health, beauty and medicinal products. Flora-based products are most common. The UK continues to primarily be a demand country - where UK exports have been identified, they have primarily surrounded caviar-based beauty products. However, it is unclear as to whether the caviar originated from UK sturgeon. Crocodile oil products have also been seen, but to a lesser extent.

One key issue with cacti products is lack of species labelling - often it just states 'cacti' and therefore is seized. Clear labelling with full species name may reduce seizures at the border.

Development needs to be conducted around prices to determine any impact on the economy. Open-source intelligence research could help to understand prices, but it is acknowledged that prices may vary significantly depending on type of species used within ingredients.

Illegally traded health and medicinal products are not being regulated and therefore pose significant potential risks to consumers taking these products.

The WCCAG have separated fauna from flora, due to the fact that flora products are most common and relate to different products, with aromatic plant-based products sitting as a priority.

CITES Taxidermy including skulls

Despite exceptionally low levels, links to cyber enabled IWT continue to be seen, with online social and marketing platforms being utilised for advertisement and distribution of products. The sale of items without the appropriate CITES permits within auction houses has also been identified.

CITES Timber



There has been a significant decline in timber seizures combined with exceptionally low levels of intelligence. It is unknown if the UK demand for illegal timber has diminished or whether there is a lack of niche specialist experts available to identify CITES timber products.

Emerging Issue - CITES Corals



Limited data from both law enforcement and partnership agencies means that an accurate risk assessment could not be made. One significant issue is the difficulty of identifying corals to determine their source country, even coral experts find this challenging.

Intelligence Gaps

- Overall offenders linked to the illegal wildlife trade have a very limited policing footprint.
- There are significant gaps around overseas offender links, including potential networks and criminality.
- Source countries and transit countries continue to pose a knowledge gap.
- The current scale of the IWT on online marketing and social media platforms is unclear.

Recommendations

- Annual MoRiLE scoring to be conducted to ensure key priorities are being addressed.
- Create sentencing guidelines for the illegal wildlife trade.
- Continue to provide training to law enforcement to help ensure that CEMA and COTES offences are recorded appropriately.
- Provide training to the CPS around IWT and reiterate the importance of ensuring that they have the capability to fully support/pursue prosecutions thus reflecting the often serious and organised nature of this criminality.

Poaching & Hare Coursing

Hare coursing and various types of poaching are volume crime issues within the UK and have been a significant threat for a long time. They can have a significant impact upon rural communities. Threats, violence and intimidation can be aspects to offending. Whilst these wildlife crime issues do differ in species targeted and MO - with poaching focussed on the illegal hunting of wildlife and coursing the pursuit of a mammal with dogs - they are grouped together due to some level of crossover with offenders, similar community impact and victims group (i.e. farmers/landowners) with trespass (including on protected land i.e. SSSI) being a common feature.

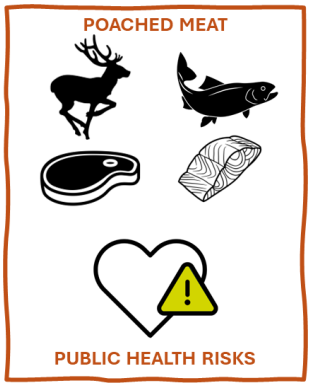
Hare coursing remains a serious seasonal activity with peak offending occurring after the summer harvest around August/September and continues into the spring until around March. Hare coursing does occur outside these times but the volume is significantly lower as opportunity to course is reduced. There is no close season for hares, unlike in other European countries, which would provide additional protection of the species. Offences have occurred more frequently on flat farmland on the east coast of England with Lincolnshire and East Anglia key locations. However, in recent years the picture has changed with significant reductions in forces most impacted as a result of additional legislation that came into force in 2022 with specific offences relating to hares[18] and the tackling of hare coursing under the national operation (GALILEO). Hare coursing is such a significant issue; partners including the National Farmers Union (NFU), Country Land & Business Association (CLA) and Countryside Alliance (CA) all have hare coursing action plans in place.



Some forces have maintained reductions in hare coursing while others are showing increases in recent months/years. The reason for the change can be due to a number of factors, these include; better recording and reporting, potential displacement and impact upon capability to deal with coursing.

[18] Police, Crime, Sentencing and Courts Act 2022

Poaching occurs throughout the year with an element of seasonality depending on species with a peak around Christmas for venison and salmon due to increased demand. However, there is limited intelligence to indicate sale prices or the financial gains offenders are making from the sale of poached animals. There are concerns regarding public health risks if unregulated poached meat enters the food chain and processed below basic hygiene standards (contamination risks and bacteria). The extent of this activity and risk to the public is unclear and not fully understood but does not appear to be significant, especially as current value of venison is low. However the cost and demand for salmon is higher and this poses a greater risk due to population decline with poaching being just one cause for the decline. As there is an overlap with the food chain the public understanding of the issue and what they witness may or may not be criminal. There are both legal and illegal activities and it can be hard to distinguish between them in certain circumstances.



Poaching impacts wildlife in different ways, especially if incidents occur frequently and intensively in specific areas, locations and/or habitats or at certain times (i.e. close season). Poaching can alter the behaviour and structure of a species population; it can affect breeding and movement patterns. There are also animal welfare issues with incidents – there can be unnecessary suffering due to wounding or the orphaning of offspring. Illegal poaching can also interfere with managed species and impact upon any management strategy in place. Illegal poaching of deer is unlikely to be having a significant impact upon deer population as certain areas are over carrying capacity. This is due to no natural predators, but also mismanagement of herds resulting in them being unsustainable or unhealthy.

Specifically for salmon migratory species, repeated poaching will impact the long-term sustainability of stocks. Many rivers in the UK are assessed as 'at risk'[19] regarding salmon population and poaching increases the pressure on this species as illegal activity is likely to be disproportionally higher given low numbers of salmon catches at currently at the lowest levels recorded.[20] Similar issues exist for sea trout.

Offenders linked to hare coursing are known to travel vast distances to course, indicating planned activity and an organised element to their offending. There is a strong link with offenders associated to the travelling community for these activities, but also a cohort of offenders who poach and hunt animals for a thrill and just to kill. Poachers are commonly poly criminals who are involved in other types of criminality.

The use of weapons is regularly reported and these include slingshots, vehicles, catapults and ball bearings – all of which have the potential to cause serious harm. There has been a perceived increase in the threat and use of violence by offenders towards the victim base. For fish poaching, violence and threats can be directed to Environment Agency workers and voluntary bailiffs.

Offenders often brag and post pictures and videos on social media of their wildlife criminality. The seizure of mobile phones and digital downloads provides strong evidence to support charging decisions. Offenders also use dogs in some poaching offences and this is an integral aspect of hare coursing. Welfare concerns exist for the dogs used in these offences and they can be seen as a disposable commodity i.e. reports of dogs left at incident to avoid being caught by police. Whereas some are prized and have significant value. This is especially true in regard to hare coursing cups linked to illicit finances. A large-scale hare coursing event in January 2025

[19] Salmonid and fisheries statistics for England and Wales 2023, gov.uk
[20] Salmon Poaching Impact Paper. Fisheries Management Scotland

occurring in and around Cambridgeshire resulted in significant community impact with violent disorder and criminal damage just some of the crimes recorded against offenders.[21]



Victims of poaching and hare coursing incidents are those most likely to experience physical and psychological harm associated to wildlife criminality, but this can be extended to police who respond and the public who interact with offenders. Those affected by this criminality can live in fear of repercussions and this can impact upon their daily life increasing anxiety levels – some have left their job as a result. These criminal activities can result in increased financial impact to victims such as crop damage, need for enhanced security measures (gates/locks/poacher blocks) and the additional loss in work time (unlock/lock gates). The rural community are also being targeted for other non-wildlife crimes such as plant and machinery theft and livestock theft. There is also a lack of confidence the police response for request for service would be adequate.[22]

Safeguarding concerns are highlighted as incidents record children/teenagers present who are being exposed to violent wildlife criminality. These youths are likely to be future wildlife offenders.

These activities can have financial implications for business i.e. cost to re-stock fish. Poaching (including theft type offences) can have a significant impact as there is a large angling community in UK - estimated at 2 million. There can also be a noteworthy future impact on tourism related to salmon as this is culturally important and salmon are a species synonymous with Scotland's rivers.



Training is an important factor in ensuring police and partners can effectively respond to poaching and hare coursing incidents. Toolkits of useful documents have been shared on DISC with police and partners involved in tackling these issues.



However, these types of incidents are heavily reliant on the public and landowners etc. reporting to police and result in a more reactive police response. Force Control Room (FCR) training videos[23] were disseminated to forces in 2023 to provide a basic understanding for first point of contact. National operations for hare coursing (GALILEO) and fish poaching/theft (LEVIATHAN/TRAVERSE) are used to educate (i.e. signage to show how to report) and highlight effective disruptive activity and convictions. Building Bridges was formed as a response to issues identified linked to the migrant angler community and works with the Eastern European community to educate and to fish responsibly within the UK.

Capacity and capability issues exist as it is difficult or impossible to conduct proactive patrols for hare coursing and deer poaching as rural crime teams cover wide/vast rural areas. Forces do not always have the right individuals responding to wildlife crime incidents and non-PWCOs respond

[21] Police make 11th arrest in connection with hare coursing and violent disorder across Cambridgeshire
[22] NGO Members survey
[23] Developed by Naturewatch Foundation, RSPCA and NWCU and available on DISC.

leading to missed opportunities to progress cases. PWCOs and rural teams are usually small and do not cover the force 24/7. However, the Environment Agency and the Angling Trust have focussed resources in known hotspot locations for fish related poaching.



Effective tactics used by police and law enforcement include Community Protection Warnings (CPWs), Community Protection Notices (CPN), but also other prohibitions including restrictions on dog ownership on conviction and the seizure of dogs at the time of arrest. Since the introduction of the Police, Crime Sentencing Courts Act 2022 there has been increased media reporting of hare coursing results, many of whom have received £1000s in fines. A large proportion of the fines relate to kennelling and veterinary costs from dog seizures.

Emerging Issues

An observed shift has been reported with more nighttime (after dusk) poaching and coursing. This change can be due to the likelihood of fewer witnesses and the reduced chance of being caught or interaction with farmers, landowners or members of the public. This could be linked to the use of specialist equipment/kits by offenders - noted in several forces across the UK.

Seizing dogs that are used in the commission of these offences (especially hare coursing) is effective as is has an immediate impact upon the offender's ability to course. Kennelling and veterinary costs for seized dogs are paid by police and claimed back on conviction.

Intelligence Gaps

- Knowledge of wildlife crime issues by first responders is inconsistent and leads to missed opportunities.

Recommendations

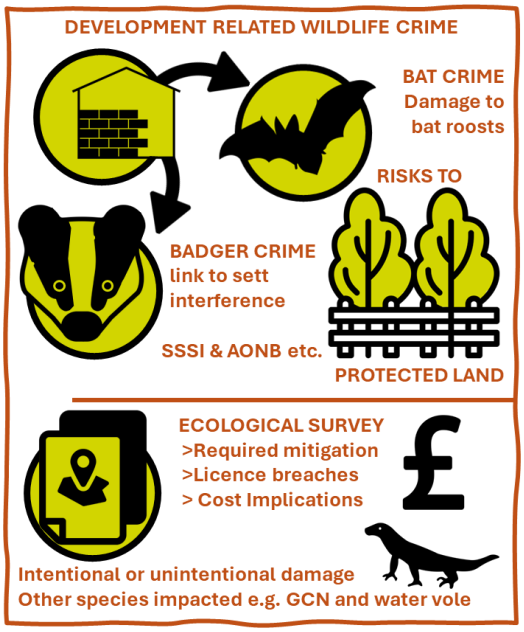
- Increased use of social media for the national operations tackling poaching and hare coursing. To raise awareness and to highlight effective disruptions and results.
- Development of package for non-PWCO officers (utilising the Force Control Room videos) to raise awareness of wildlife crime issues.

Other Wildlife Crime Issues of Note

Development Related Wildlife Crime

MoRiLE assessment of development related wildlife crime indicates this is an issue of concern. It also has strong links with two current priorities (bat crime and badger crime). However it did not score highly enough to be made an individual wildlife crime priority.

Development related activity can result in unfavourable change, damage or destruction to a landscape/habitat. This may be on land that has additional protections (e.g. SSSI, AONB). Changes as a result of development will also impact upon the flora and/or fauna in the vicinity. This may be small scale (i.e. loft conversion) or large scale (multi-million-pound housing development). The main issue arises from the conflict between environment/wildlife and the need for development.



Development related wildlife crime can include authorised (not following mitigation processes) and unauthorised developments. Financial motivation is the main reason for criminal activity associated to development as there are costs associated to mitigation requirements and resulting delays to development. To avoid these costs, development occurs without full consideration or is completed by intentionally ignoring advice/guidance/protocol. A lack of knowledge of legislation and planning regulations can be a factor in some cases, in addition to a lack of understanding of impact and that development has resulted in criminal activity.

Criminal activity and damage can occur due to intentional or unintentional action. Activity can be the result of miscommunication, conflict, or to shift blame between different parties involved in developments. Poor or out of date ecological surveys that do not reflect the current situation when development activity occurs can be a factor.

Currently, development issues are being looked at by a sub-group of the Badger Crime PDG as it was identified 12.4% of badger related incidents are development related with about 1-2 incidents occurring weekly. In addition, the Bat PDG has previously highlighted development issues which represent 75% of bat incidents. Wider co-ordination is necessary to tackle our understanding of the problem rather than focusing on specific species impacted. Licence breach data[24] indicates the volume is very small, but impacts a range of species including badgers, bats, dormice, great crested newt (GCN) and water vole.

A multiagency approach is needed to tackle development related wildlife crime and to understand the current threats and risks. There is an education need across various groups including; Police, Local Authority, Planning Departments, Specialists, Ecologists, Expert witnesses and Government agencies (e.g. Natural England, Natural Resources Wales etc.) to

[24] Natural England Data:2020-2025 (to date)

better understanding the regulations related to habitats and specific species. Cases can also rely on experts to make assessments/statements i.e. ecologists and expert witnesses.

Emerging Issues



There is likely to be an increased demand for housing and this will increase the conflict between humans and wildlife in the future. The labour government have pledged to build 1.5M new homes and to reform planning restrictions, this may result in green belt rules to be relaxed. The planning and infrastructure bill[25] currently being drafted and at discussion phase with a nature fund established to ensure builders can meet environmental obligations. Any changes are likely to be some time in the future and therefore it is unclear what the full impact of the new regulations will be and the potential impact on the environment, habitats and wildlife.

Intelligence Gaps

- Increase understanding of the impacts of developments on wildlife and identify potential data sources.

Recommendations

- Formation of a Working Group to tackle the development related wildlife crime. Identify a chair and group membership. Consider utilising a 4P Plan. Consolidate work already in progress from the bat and badger PDGs and subgroups.

Marine



Marine disturbance is a common issue and can have significant impact upon wildlife. Coastal/marine locations are popular for leisure and tourism activities and draw people to enjoy the natural environment and wildlife (ecotourism). This has resulted in increased interactions between people and wildlife. Some acts are intentional and criminal; others are a result of reckless behaviour or may be unintentional. Lack of awareness and/or consideration of the impact of individuals' actions and behaviour can be factors in offending. Activity primarily refers to the disturbance of wildlife in marine environments where humans cause a change in behaviour, affect their breeding pattern, migration, social interaction etc. Some species are physically injured or killed intentionally.

Some offending locations are within marine protected areas or SSSI highlighting these are important locations for the environment and wildlife. Seal disturbance data indicates large numbers of seals are impacted annually[26] and incidents involving jet skis, motorboats and coastal walkers disturbing marine life have more than tripled since records were first collected in 2014.[27] This picture may not be reflected nationally and there is lack of data to establish the full picture of impacts across all species, due to ability to evidence offences under current legislation.

[25] 'Biggest building boom' in a generation through planning reforms - GOV.UK
[26] Seal Research Trust – Disturbance Data
[27] Cornwall Wildlife Trust

The marine working group aims to identify marine wildlife concerns and aid the effective enforcement of wildlife legislation in the UK marine environment as part of the partnership for action against wildlife crime (PAW). The group provide advice, information and expertise including a network of enforcement officers taking responsibility for local marine environments.

Operation SEABIRD was set up in Humberside, with initial focus on seabirds but has since expanded to include other species and other forces with coastal and marine environments. Operation SEABIRD is a partnership operation with focus on raising awareness and active public engagement with partnership days held throughout the year, but there is a seasonal aspect to this issue linked to summer sport and recreation resulting in the human/wildlife conflict.

Emerging Issues

There is a growing concern of increased human/wildlife conflict as marine environments are used more and for different activities leading to greater pressures on these ecosystems and the wildlife that live within them.

There are also concerns over the use of drones and the impact they can have on wildlife disturbances.



Intelligence Gaps

- Increased reporting and recording of marine related disturbance incidents to assist with better understanding the issues.

Recommendations

- Continued partnership working under Operation SEABIRD to tackle marine disturbance issues in forces with coastal environments.
- Marine working group to consider increasing statistics on disturbance levels and consider how SSSI designation can enhance enforcement opportunities.

Egg Collecting

The taking of wild bird eggs is illegal, yet it remains an illicit hobby for some determined individuals. Egg collectors operate in the UK and internationally, taking eggs from the wild and building their collections through illicit trading. The rarest and most endangered species are particularly sought after. Operation EASTER is the annual awareness campaign focussed on this activity. This is a long running operation which provides a high degree of certainty about trends, MOs and individuals involved in this bespoke activity. Egg collecting is becoming less common and the illicit hobby has declined in popularity. In recent years, egg collecting incidents and intelligence submissions have remained stable and the offending appears to be low in volume. However, egg collecting and illegal trade may be far more prevalent than what is reflected in police statistics.

Emerging Issues

Trade - in 2024, Operation PULKA dismantled a transnational egg trading network and highlighted the harm caused by this illegal activity both in the UK and internationally. The cyber-enabled egg trading involved historic collections and wild taken specimens. Monetary gain wasn't a motive historically associated with egg collecting, but transaction and trade evidence from Operation PULKA indicates significant financial rewards.

Nest photography and disturbance – photographers are known to visit nest sites to capture up-close photos of nesting birds. Occasionally, this activity goes too far and disturbs the parents causing the nest to fail. There are several reported nest failures, notably, two osprey nests which failed in Scotland in 2024.



Intelligence Gaps

- Online trading and criminal networks – Operation PULKA unearthed a transnational egg trading network and raises the possibility that other networks like this exist which are unknown to police. There is scope for law enforcement to better understand cyber-enabled egg trading, the relationship to wild taking and identify key nominals and networks involved in this activity.

Recommendations

- Continue to run Operation EASTER awareness campaign and highlight link between wild taking and egg trading.

Invasive Non-Native Species



The ecological and economic harm of Invasive Non-Native Species (INNS) in the UK is huge and police must play a role in preventing crime and enforcing legislation. Nationally, much of the focus on INNS relates to the containment and management of INNS which have established in the wild over decades. Government agencies take the lead on these issues, although police will work with partners when criminal offences are identified. There are relatively low numbers of incidents recorded on PND identifying criminal releases of INNS. The MoRiLE score may increase substantially if there are examples identified where criminal acts lead directly to ecological harm and spread of zoonotic disease.

Currently, there are three main categories of INNS criminality which police respond to:

- Horticulture related INNS incidents – invasive plants species sold illegally or allowed to spread (e.g. Japanese knotweed).
- Rogue re-wilding – release of non-native species into the wild by individuals who would like to see certain species established in the UK. For example, the 2024 release of four Eurasian lynx in Scotland.
- Exotic pets/captive animals – animals which have been released or allowed to escape.

Emerging Issues

- The theft and damage of INNS control measures (e.g. traps).

Intelligence Gaps

- Several government agencies, including police, are involved in the management of INNS. Therefore, there are several databases where INNS related data is held. Building up a national picture of criminality involving INNS is challenging. There are gaps in understanding offending trends nationally and the extent to which criminal acts are causing harm.

Recommendations

- Develop dataset using partner data to better understand crime trends.
- Identify case studies to support MoRiLE scoring which evidence harm caused by criminal acts (e.g. environmental, economic impacts etc.).

Targeting Wildlife - Catapulting

Incidents involving wildlife being targeted with catapults, and other weapons such as slingshots, air rifles, small calibre guns, ball bearings and crossbows have been reported in green/open spaces in urban areas. Various wildlife is being targeted and this is dependent on what wildlife is located where the incident occurred. Birds, especially those that are attracted to bodies of water, are commonly targeted. Abundant common species (and domestic animals) are mostly targeted, however, rarer species including red kite and otter have been victimised. Targeting can result in the injury and death of wildlife and activity is linked to ASB and criminal damage.

Offenders are targeting wildlife for fun and thrill to hit, injure and kill. There is also a competition aspect where they can show off their 'skills' at hitting wildlife, with posts to social media. Offenders are commonly children/youths aged from 12 to mid 20's. There is also a link to the traveller community.

Operation LAKESHOT was set up to tackle the issue with a focus on education, prevention of re-offending, detection and bringing offenders to justice.

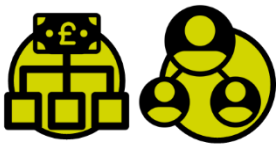
Recommendations

- Operation LAKESHOT to continue to focus on education and preventing re-offending.



Cross-Cutting Themes

SOC & OCGs



Significant steps have been made around identifying, understanding and mapping wildlife crime networks. These have focused on the illegal wildlife trade due to international associated Serious Organised Crime (SOC) and Organised Crime Group (OCG) activity.

Our understanding of criminal networks has indicated poly criminality, with some transnational networks engaging in other serious crime such as money laundering and corruption.

The NWCU identify and map wildlife crime OCGs and feed the information into the national SOC picture – focusing on disruption activity. The aim is to better reflect the SOC threats from wildlife crime.

SOC offenders identify weaknesses in processes/systems and will exploit these for financial gain, this is often low risk but high reward. They are able to adapt to law enforcement action and can alter behaviour in response to disruptions i.e. changing trade routes or altering documentation.

SOC related to wildlife crime links to other recognised SOC priorities including fraud, money laundering, illegal commodity importation and cyber enabled criminality. These activities are integral facilitators of the illegal wildlife trade and the exploitation of wildlife. There are previous cases where Modern Slavery and Human Trafficking has been linked to wildlife crime i.e. exploitation of cockle pickers.

Forensics



The consideration of possible forensic opportunities at wildlife crime scenes is important evidentially for cases and can prove essential for supporting cases at court. Ideally, specialist crime scene investigators should attend wildlife crime scenes, however if they are not available, specialist sampling kits allow evidence to be properly collected and protocols followed to ensure strict chain of custody occurs. The PAW Forensic Working Group developed a sampling kit and also provide detailed guidance for attendance at wildlife crime scenes and what evidence to look out for.

Examples of use of forensics in wildlife crime investigations include gender identification of species to determine sex, this can be to establish for example if an offence had been committed during the closed season for deer. DNA profiling of birds of prey[28] can be used to confirm or disprove parentage. This was used in Operation TANTALLON associated to the peregrine falcon trade and identified wild taken birds and claims were compared to supporting documents indicating false declarations.

The Forensic Analysis Fund (FAF) offers financial support for forensic analysis during wildlife crime investigation and has been used to assist cases which would have otherwise failed to reach prosecution stage. This now includes 100% of cost for raptor/bird of prey persecution cases in the UK.

[28] Restricted to certain species. Peregrine Falcon DNA database being compiled by SASA.

Enablers

Law enforcement and partner agencies must address key crime enablers to tackle wildlife crime effectively. Illicit finance, fraud, misuse of legal business structures, and corruption are pervasive enabling factors.

Cyber Enabled



As society becomes increasingly digitised, so too does criminality and there is nearly always a digital element within the illegal wildlife trade. Marketing sites are a key method for sellers to advertise and distribute their illegal wildlife stock, enabling offenders to both facilitate and engage in criminality. Social media is increasingly being used to enable other areas of wildlife crime, such as animal cruelty, poaching, hunting and coursing. Criminals are utilising both open and closed groups on social media platforms and will encrypt online messages for private communication.

Cyber enabled wildlife crime ultimately allows criminality to continue. The use of the internet as an enabler manifests throughout many types of wildlife crime; from the on-line trade in illegal egg collections to the organisation of hare coursing competitions to the trade in endangered species. An international investigation into the horrific torture and killing of baby monkeys has been identified during this reporting period. Although crimes of this nature don't completely fall under the banner of IWT, offenders are exchanging money for the purposes of watching a CITES listed species be tortured over live stream. Criminals have utilised the internet to communicate, provide payment and view torture. Three UK individuals have been convicted and received custodial sentences[29].

Challenges arise when examining advertisements and images for sale on internet sites, as there may not always be sufficient details/evidence to confirm whether they are in fact CITES-listed or protected.

Recommendations

- To continue to refresh open-source intelligence training to ensure that NWCU is abreast of the most effective tools and legislation to conduct intelligence development and gather evidential captures.
- To continue to expand partnership collaboration with current and new agencies, to assist with strengthening knowledge, data sets and sharing best practice.
- To conduct open-source scanning to understand the true scale and picture of the online illegal trade.

Illicit Finances



The illegal wildlife trade is a serious financial transnational crime, that generates around £17 billion pounds per year in illicit finances. Despite this the illegal wildlife trade continues to be assessed as a lower priority for law enforcement and government agencies.

Globally, wildlife crime is often convergent with serious crimes such as human trafficking, drugs and violence. The identification of organised networks has indicated poly criminality, with indications that some transnational networks are engaging in other serious crime such as money

[29] Women jailed over sadistic monkey torture videos - BBC News, Man jailed for publishing monkey torture online | Merseyside Police

laundering and corruption. Several non IWT wildlife crimes also have links to illicit finances and gambling, such as hare coursing cups.

Recommendations

- Produce a 4P Plan for illicit finances with a view to setting up an illicit finance working group.

Fraud



A key theme seen within IWT offences is that the illegal trade is being concealed within the legitimate trade. Some nominals of interest are exploiting loopholes within processes and permitting systems and committing documentation fraud to commercially use, unlawfully trade and/or traffic CITES species.

The body of legislation that implements CITES in the UK largely derives from the EU and was designed to administer a common EU-wide system. In some instances, this includes additional safeguards or controls that have been introduced for conservation and practical purposes that go beyond the minimum requirements set out by CITES. Under the Retained EU Law (Revocation and Reform) Act 2023 there is an opportunity to review CITES implementing legislation to ensure that it is clear, proportionate, and fit for purpose for the UK as a single CITES Party, enabling a more coherent and effective legal regime.

Recommendations

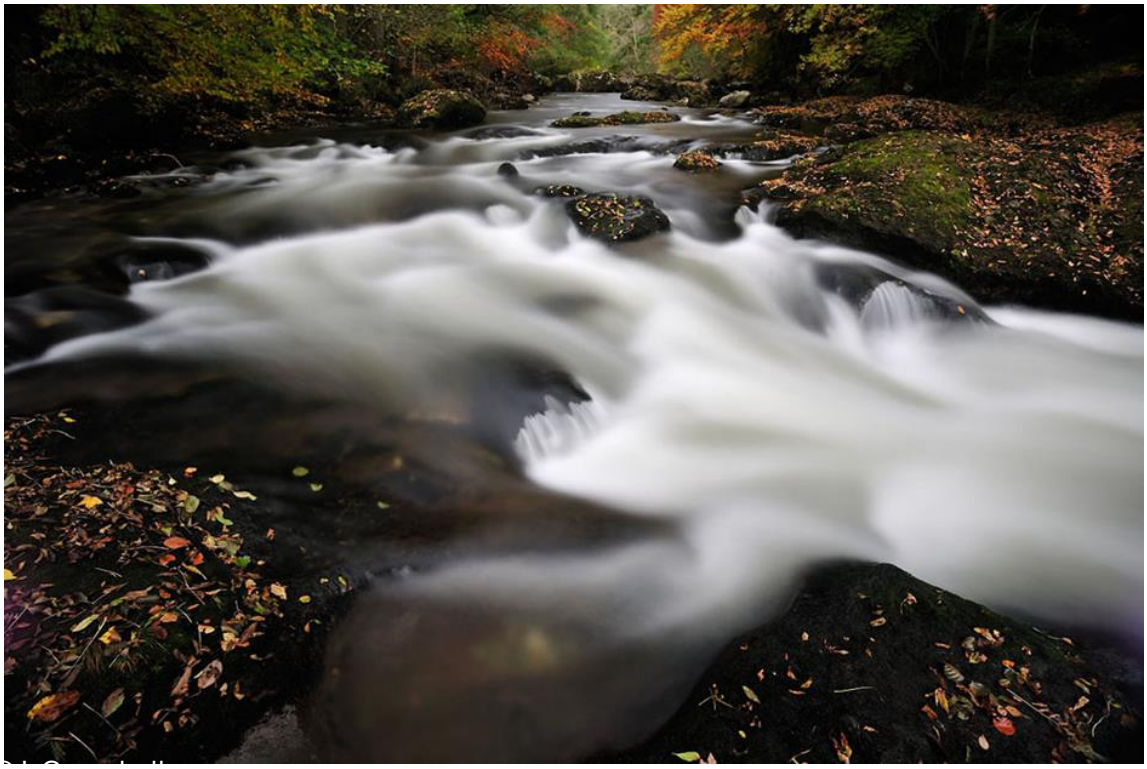
- NWCU to continue to feedback methods identified where offenders have exploited loopholes to commit IWT offences.

Legal Business Structures

Legal business structures are used to facilitate and conceal wildlife crime, including the illegal trade and laundering of illicit profits. Criminal networks use legitimate companies as fronts to mask illegal activity and obscure the trafficking of protected wildlife. These businesses can provide a veneer of legitimacy, allowing criminals to move commodities under the guise of legal trade, take advantage of supply chains and exploit regulatory gaps. Limited companies reduce scrutiny on individuals and offer a degree of anonymity, which makes it more challenging for law enforcement to disrupt criminality.

Corruption

Bribery and corruption can undermine efforts to combat wildlife crime, making it easier for criminals to operate. OCGs have the potential to infiltrate, bribe and corrupt public or private sector employees, public officials or law enforcement officers. The most likely aspect linked to wildlife crime would be to assist with the movement of illicit goods across the border. However, this has not been identified within mapped UK wildlife crime OCGs. The rationale is likely to be that corruption is not necessary as offenders are able to commit offences by exploiting the current gaps i.e. concealing illegal activity within legal trade processes such as via document fraud.



Risks & Challenges

Poly-Criminality

Poly-criminality refers to the activity of groups involved in wildlife crime who are engaged in multiple types of criminal activity rather than specialising in a single type of offence. They commonly operate across borders making them transnational. The motivation for poly criminality can include the following:

- **Increased Profits:** Diversifying criminal activities can lead to higher overall profits for the OCG.
- **Diversify Risks:** OCGs can mitigate risks of law enforcement disruption by engaging in multiple activities.
- **Adapt to Law Enforcement:** OCGs who are involved in multiple criminal activities are more flexible and can shift to focus on lower risk activities in response to law enforcement activity.
- **Costs:** Engaging in multiple activities can allow OCGs to share resources and infrastructure, reducing overall costs.

Globally the illegal wildlife trade has been linked to other serious crime, such as fraud, corruption, and money laundering. This cross-over isn't fully evidence across all types of wildlife crime as there are many factors linked to offending and wildlife crimes differ in motivation, skills, knowledge, situational, connections and equipment required.

There is a real risk that OCGs linked to the highest levels of crime will move towards wildlife crimes due to its low risk, high reward perception.

Recommendation Further research and development to be conducted to understand poly-criminality and the link to wildlife crime offenders/OCGs.

Crime Convergence

Crime convergence, also known as threat convergence, refers to the interconnection of various illegal activities. The integration strengthens organised groups and can lead to an increase in criminal activity/exploitation. This will have negative impacts on wildlife and the environment.

Crime convergence poses significant challenges for law enforcement. It requires a holistic approach to effectively disrupt OCGs/complex trade networks. It is varied, complex, and currently insufficiently researched therefore requires focus to better understand what is occurring and how it links to wildlife crime. This will be especially difficult to fully assess in relation to international IWT as sharing of information between countries is very complex. There is potential that illegal wildlife trade networks will increasingly converge with other crime types or criminal groups involved in drugs, weapons and human trafficking may shift to wildlife crime as it has less law enforcement attention.

It is currently difficult to assess the level of crime convergence associated to wildlife crime in the UK. Although it is likely to be present, evidence is limited.

Recommendation Ensure crime convergence links are fully researched when looking at SOC and OCGs and results to be fed into relevant national policing structures.

Priority of Wildlife Crime in Policing

Wildlife crime is commonly deemed a low policing priority because threat, risk and harm to humans is considered to be low. Wildlife crime does not feature within police force control strategies nor is it a SOC priority. Internationally, and across all European countries, wildlife crime falls under the umbrella of environmental crime, which attracts a higher priority status - this is not reflected within UK policing, where wildlife crime is combined with rural crime.

Illegal wildlife trade should be dealt with as a serious financial crime as it is the fourth largest global illegal trade. If IWT is recognised as such then law enforcement and government agencies would be compelled to prioritise and resource IWT. The NWCU continue to feed into the national SOC picture through MoRiLE scoring of OCGs and the disruption process to increase the profile of wildlife crime.

Recommendation Scope the possibility for wildlife crime to be aligned more with environmental crime to reflect the international approach and raise the collective understanding of the importance of wildlife crime enforcement.

Capacity & Capability

Police forces are set up differently to tackle wildlife crime - commonly it sits within small rural teams who have wide remits. Not all UK forces have dedicated PWCOs. Those that do are unlikely to be operational 24/7. This inhibits the ability to respond and investigate wildlife crime proactively or reactively. These issues impede the management of wildlife crime and create vast inconsistencies in the police response across the UK. Pressure on budgets puts significant additional strain on these teams. The increase in designated points of entry and exit into the UK has placed a considerable strain on UK Border Force resources.

There is a significant knowledge gap for non-PWCOs as wildlife crime training is not part of most forces initial training. Some forces (e.g. PSNI) provide basic wildlife crime training to all officers. Specialist skills and knowledge are required to investigate. Temporary employment contracts generated to support short term projects, result in units losing valuable skillsets, experience and unique specialisms, which are extremely hard to replace when new funding bids are provided for further projects.

This is interlinked with funding limitations which restricts the procurement of vital equipment. Offenders are becoming increasingly more technologically advanced, so it is crucial law enforcement also acquires the most effective resources.

Data

Data is pivotal to understanding the current picture of wildlife crime. Inconsistencies exist across all wildlife crimes and data available does not reflect the true and full picture. There is also a significant proportion of wildlife crime that likely goes unreported.

Most wildlife crimes are not Home Office notifiable, therefore it is difficult to assess the true picture as data is inconsistently recorded. There are calls to make wildlife crime notifiable, however there are no current plans to do so by the UK parliament[30].

Recommendation Making wildlife crime offences Home Office notifiable will ensure a consistent dataset to assess issues and will also give a clearer picture of what is reported.

[30] Wildlife crime at worrying levels while convictions at an all-time low warn conservationists, Annual wildlife crime report reveals the need to make wildlife crime notifiable, Written questions and answers - Written questions, answers and statements - UK Parliament

Appendix – WCCAG & MoRiLE

WCCAG conservation scoring assessment is utilised for the relevant conservation issues and assists with MoRiLE assessments. MoRiLE scores are used to identify wildlife crime priorities as it allows direct comparison between all thematic areas as they are scored against the same criteria.

Scores will differ from last strategic assessment for several reasons. This assessment includes a more robust and consistent moderation process which ensures consistency across themes. It is recognised wildlife crime doesn't fit perfectly within the MoRiLE assessment criteria - focus on some categories refer only to human impact i.e. physical and psychological harm. These aspects of wildlife crime are therefore captured within the 'environmental' impact and harm section. NWCU has created bespoke guidelines for some categories of MoRiLE in order to aid assessment - especially for the illegal wildlife trade. In addition, NWCU have specific wildlife crime volume of scales for different crimes and species in line with scales used for drugs and other crimes.

Several other wildlife issues were considered for MoRiLE assessment, these have not been fully scored. Themes and rationale are detailed below:

Habitat Damage/Destruction: This was difficult to assess as the issue is too broad. There are a wide range of habitats in the UK from coastal, farmland and moorland to wetland, grassland and woodland. Each will have bespoke ecosystems including the flora and fauna they contain. They will vary across the UK and therefore the type of criminal activity will vary considerably. However, human impact and damage to habitats for a human benefit is commonly associated to developments and is highlighted with bats and badger priorities. Development related wildlife crime has been separately MoRiLE scored.

European Protected Species (EPS): The EPS list includes a wide range of species within different habitats across the UK and a range of potential offending type. Limited data is available for EPS. Habitat damage is the most likely cause of criminal activity that will impact these species therefore has significant cross-over with habitat damage/destruction and development. EPS excludes other wildlife e.g. badgers where there is a known issue related to habitat damage and development.

Online Cruelty & Torture: There is evidence to corroborate the internet is being used to facilitate and or publicise the cruelty and torture of wild species. This has been seen within various crime areas such as badger baiting, hare coursing, catapulting wildlife and the global monkey torture network. There is a large intelligence gap in our knowledge and understanding of this cyber linked wildlife crime. Criminal activity occurs overtly, and law enforcement does not have capacity nor capability to assess all online activity. It was determined that to capture such offences, a strict term of reference is required, which must include appropriate keywords and indicators. This thematic area has therefore been referred to the cyber network to research the true scale.