



DIRECTORATE-GENERAL FOR INTERNAL POLICIES

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ECONOMIC AND SCIENTIFIC POLICY **A**

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# Wildlife Crime in the United Kingdom

In-depth Analysis for the ENVI Committee





DIRECTORATE GENERAL FOR INTERNAL POLICIES  
POLICY DEPARTMENT A: ECONOMIC AND SCIENTIFIC POLICY

# Wildlife Crime in the United Kingdom

## IN-DEPTH ANALYSIS

### **Abstract**

This paper provides an in-depth analysis of wildlife crime and efforts to combat it in the UK. It was commissioned by Policy Department A at the request of the Committee on the Environment, Public Health and Food Safety. It presents an overview of significant seizures and criminal prosecutions, discusses the involvement of organised crime groups and provides an insight on relevant actors, the current domestic legislative framework and the actions taken by the UK to tackle wildlife crime.

This document was requested by the European Parliament's Committee on the Environment, Public Health and Food Safety.

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## LIST OF ABBREVIATIONS

<b>APHA</b>	Animal and Plant Health Agency
<b>BF</b>	Border Force
<b>CITES</b>	Convention on International Trade in Endangered Species
<b>COTES</b>	Control of the Trade in Endangered Species
<b>CPS</b>	Crown Prosecution Service
<b>DEFRA</b>	Department for Environment, Food & Rural Affairs
<b>DfID</b>	Department for International Development
<b>EIA</b>	Environmental Investigation Agency
<b>HMRC</b>	Her Majesty's Revenues and Customs
<b>ICCWC</b>	International Consortium on Combatting Wildlife Crime
<b>IWT</b>	Illegal Wildlife Trade
<b>JNCC</b>	Joint Nature Conservation Committee
<b>MA</b>	Managing Authority
<b>NCA</b>	National Crime Agency
<b>NGO</b>	Non-governmental Organisation
<b>NWCU</b>	National Wildlife Crime Unit
<b>OCGs</b>	Organised Crime Groups
<b>PAW</b>	Partnership for Action Against Wildlife Crime
<b>PIE</b>	Prevention, Intelligence and Enforcement
<b>PIER</b>	Prevention, Intelligence, Enforcement and Reassurance
<b>RBG</b>	Royal Botanic Gardens
<b>RSPB</b>	Royal Society for the Protection of Birds

**RSPCA** Royal Society for the Prevention of Cruelty to Animals

**SA** Scientific Authority

**WSPA** World Society for the Protection of the Animals

**WWF** World Wide Fund for Nature

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## EXECUTIVE SUMMARY

The **illegal trade of wildlife is a major problem in the UK**, which is a significant transit and destination country. There is a very wide range of species affected by the illegal trade, including reptiles, endangered birds and their eggs, caviars, corals, ivory from elephant and hippo and horns from rhino. The number of seizures is high; between 2009 and 2014 UK Border Forces made 2 853 seizures in total<sup>1</sup>. Nevertheless, wildlife crime covers not only illegal trade in wildlife but other illegal actions, such as poaching. Within the UK, the other most common wildlife crimes include badger persecution<sup>2</sup>, bat persecution, deer and fish poaching, hare coursing and raptor persecution (NWCUC, 2014).

Links between **wildlife crime and organised crime groups** have also been identified. Organised crime and illegal wildlife trade is known to be linked to rhino horn thefts and trade, to trade in raptors and bird eggs, and to the repeated sale of traditional medicine products (Sollund and Maher, 2015, p. 24), while poaching and raptor persecution are sometimes linked to organised crime groups<sup>3</sup>.

At the same time, the **efforts to combat wildlife crime in the UK are wide-ranging** and numerous actions taken provide good practice examples that could be followed in other EU Member States. The UK government has undertaken a large number of capacity-building and cooperative actions both within the UK and with international actors. Some of the most prominent examples include the organisation of the high-level London Conference on Illegal Wildlife Trade where the London Declaration on Illegal Wildlife Trade was adopted, the establishment of the Illegal Wildlife Trade Challenge Fund, which supports projects in the developing world focusing on the reduction of demand for endangered species, and the Government's support for the Global Tiger Initiative Multi Donor Trust Fund and the International Consortium on Combating Wildlife Crime (ICWC). Furthermore, numerous awareness-raising campaigns have been launched with the involvement of non-governmental organisations (NGOs).

The current domestic regulation on CITES, **the Control of the Trade in Endangered Species (COTES) Regulation**, is under review with the aim of further strengthening enforcement. There is a **well-established institutional set up** with various governmental actors involved in wildlife crime related issues. The National Wildlife Crime Unit (NWCUC) within the UK Police Force and the UK Border Forces specialised CITES team based at Heathrow Airport play an important role in tackling wildlife crime. Furthermore, the UK Partnership for Action Against Wildlife Crime (PAW UK), a multi-agency group comprising representatives of statutory bodies and NGOs involved in wildlife law enforcement in the UK, is also a key player. Finally, national and international NGOs, such as the World Wildlife Fund (WWF), the wildlife trade monitoring network TRAFFIC and the World Society for the Protection of the Animals (WSPA) also contribute to ending wildlife crime in the UK and to raising awareness of the issue.

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<sup>1</sup> WWF UK. "Are we winning the battle?", 2015, <https://blogs.wwf.org.uk/blog/campaigns/are-we-winning-the-battle/>.

<sup>2</sup> Wildlife persecution covers various forms of the mistreatment and cruelty done to animal species.

<sup>3</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCUC), 30 October 2015.

## 1. INTRODUCTION

This in-depth country analysis presents insights on wildlife crime and efforts to combat it in the UK and was compiled as part of a larger project for the European Parliament called a 'Study on Wildlife Crime' which collected insights into wildlife crime in the EU as well as efforts to combat it (Sina et al. 2016). The study also presents conclusions on how to enhance EU and Member State action on wildlife crime. The present in-depth country analysis has informed the main study, but contains a more detailed description of the situation in the UK than the main study. In addition, to this in-depth analysis, similar analysis has also been prepared on Germany, the Netherlands, Poland and Spain.

The present analysis is based on desk-based research, one interview with a key resource person on the topic of wildlife crime as well as the analysis of available data on wildlife crime. Generally, it should be noted that data on wildlife crime (as on other forms of environmental crime) have significant gaps; the data that exist are not necessarily coherent across time or between countries.

The text is structured as follows: Section 2 presents an overview of wildlife crime in the UK with a focus on the number of seizures, criminal prosecutions and the existence of organized crime groups. Section 3 presents efforts at addressing wildlife crime in the UK, including a description of relevant actors, the legislative framework and the actions taken at both international and national level. Section 4 presents the conclusions on wildlife crime in the UK. Policy recommendations can be found in the main study on wildlife crime.

## 2. WILDLIFE CRIME IN THE UK<sup>4</sup>

### KEY FINDINGS

- The UK has a substantial role in illegal wildlife trade as a transit and destination country and a wide range of species are affected by the illegal trade.
- The number of seizures is high; between 2009 and 2014 the UK Border Forces made 2 853 seizures in total<sup>5</sup>. A significant portion of seizures are made at Heathrow Airport.
- The number of criminal prosecutions varies by year. For instance between 2013 and 2014, 18 criminal prosecution cases took place.
- Apart from wildlife trafficking other crimes against endangered species is also a concern in the UK. Poaching is the most common wildlife crime in the UK, while other common types of wildlife crimes include badger persecution<sup>6</sup>, bat persecution and raptor persecution.
- Links between wildlife crime and organised crime groups have been identified in the UK, particularly in relation to rhino horn thefts and trade, to trade in raptors and bird eggs, and to the repeated sale of traditional medicine products. Some 19 organised crime groups are currently identified in the UK with the involvement of 134 individuals mainly linked to poaching, raptor persecution and other CITES related illegal wildlife trade<sup>7</sup>.

### 2.1. Illegal wildlife trade

Illegal wildlife trade is a major problem in the UK; a wide range of species and their derivatives are either brought to the UK for consumption and/or use, or transited through the UK to other parts of the world.

Demand for endangered wildlife products is increasing and is further exacerbated by new technologies that facilitate illegal trade such as the internet. The internet has opened up new ways to undertake illegal activities. The scale of illegal wildlife trade has become a serious threat to many species subject to trade.

#### 2.1.1. Quantitative insights on seizures

The UK plays a **substantial role in illegal wildlife trade as a transit and destination country**. According to the latest CITES biennial report<sup>8</sup> **significant seizures in 2013 and 2014** included the following<sup>9</sup>:

<sup>4</sup> This in-depth case study solely focuses on the United Kingdom and does not include information on the UK's Overseas Territories and Crown Dependencies.

<sup>5</sup> WWF UK. "Are we winning the battle?", 2015, <https://blogs.wwf.org.uk/blog/campaigns/are-we-winning-the-battle/>.

<sup>6</sup> Wildlife persecution covers various forms of the mistreatment and cruelty done to animal species.

<sup>7</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCU), 30 October 2015.

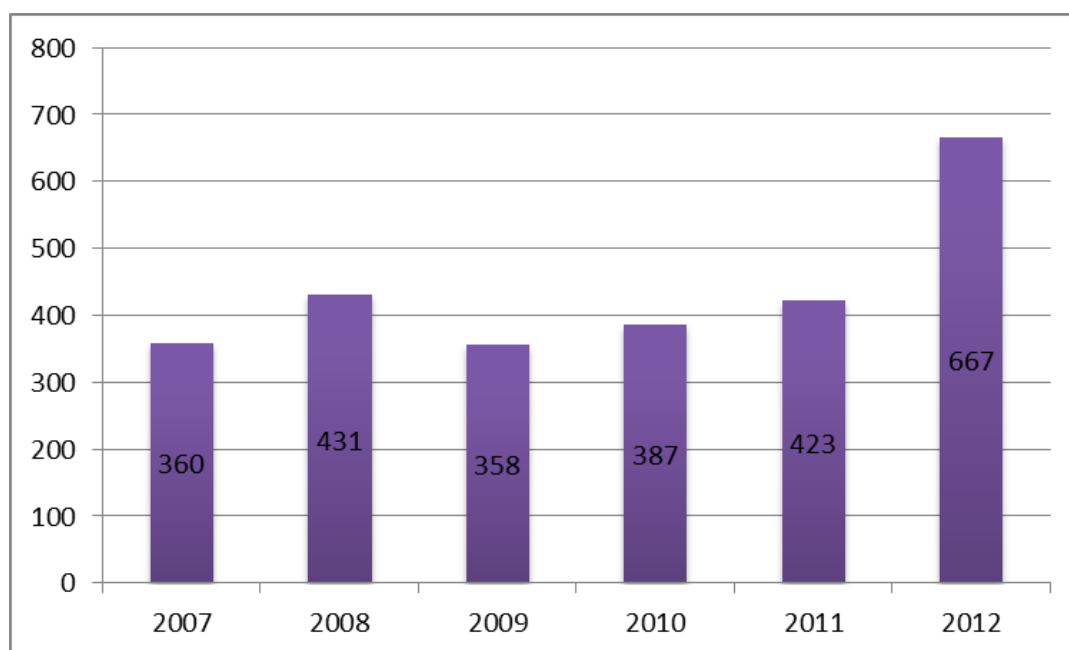
<sup>8</sup> The parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) are required to biannually share information with the CITES Secretariat regarding their overall implementation of the convention.

<sup>9</sup> CITES UK Biennial Report 2013/2014.

- In 2014, thirteen San Salvador rock iguanas were seized at Heathrow Airport in, out of which twelve were repatriated to the Bahamas and one died.
- Between 2013 and 2014, a number of major seizures of herbal supplements took place, one of which exceeded 5 000 kg.
- In 2013, two major seizures took place at Heathrow Airport of 'Red Sandalwoods' which were in transit from New Delhi to Hong Kong.

While the total number of seizures is not provided in the 2013/2014 CITES biennial report, specific figures were included in the previous CITES biennial reports (see Figure 1). These reports also include the list of the seized species, providing details of the quantity and country of origin of the illegally traded wildlife specimens.

**Figure 1: Number of seizures in the UK between 2007 and 2012**



**Source:** Author's compilation based on CITES UK Biennial Reports 2011/2013, 2009/2010 and 2007/2008.

According to WWF UK, between 2009 and 2014 the UK Border Forces made 2 853 seizures of illegal wildlife products and 10 % of these seizures were related to tigers, rhinos and elephants<sup>10</sup>.

With regards to **significant seizures in 2015**, information can be found in press releases, in particular those published by the UK National Wildlife Crime Unit (NWCU), a specialised police unit tackling wildlife crime (see more details below). According to the NWCU<sup>11</sup> and the UK Border Forces some examples of recent illicit wildlife trades include the following:

- In January 2015, a warrant was undertaken in Lancashire and several coats made from derivatives of endangered species, such as Grey Wolf and Ocelot were found. The investigation revealed that the furs were linked to a German supplier. The evidence was forwarded to the German authorities where an investigation has been initiated.

<sup>10</sup> WWF UK. "Are we winning the battle?", 2015, <https://blogs.wwf.org.uk/blog/campaigns/are-we-winning-the-battle/>.

<sup>11</sup> NWCU. "NWCU & Police Press Releases", <http://www.nwcu.police.uk/category/news/nwcu-police-press-releases/>.

- In February 2015, according to a press release of the UK Border Forces<sup>12</sup>, a large number of endangered geckos were seized at Heathrow. The 165 turquoise dwarf geckos were imported from Tanzania. Within the same consignment 36 bearded pygmy chameleons, 112 peacock tree frogs, 192 whip scorpions and 66 yellow-headed geckos were also found.
- In April 2015, an auctioning house voluntarily surrendered a collection of carved elephant ivory, which had been given to the house after the death of the owner. Even though CITES does include exemptions relating to 'antique ivory' the auctioning house was unsure whether all pieces were antique and therefore got in touch with the NWCU.
- In July 2015, the NWCU together with the Cumbria Police seized nine pieces of ivory.

The large number of seizures at Heathrow Airport shows a geographical hub of illicit wildlife trade actions. Nevertheless, trade in illegal wildlife is also facilitated by postal services. Even though the CITES biennial reports provide a detailed overview of the number of seizures made by UK authorities in 2015, significant changes have also been made to the UK national statistics in order to provide an overview of wildlife crime at the national level. A new standalone classification was established for wildlife offences including CITES related offences (HM Government 2015). Since April 2014, the number of wildlife crime incidents are recorded and reported separately in the national quarterly crime statistics.

#### 2.1.2. Quantitative insights on criminal prosecutions

In 2005, an amendment to the domestic regulation enforcing the CITES convention in the UK increased the maximum prison sentence for wildlife crimes from 2 years to 5 years. The level of fines is unlimited. According to the 2013/2014 CITES biennial report, 18 **criminal prosecution cases** took place. These included the following cases which resulted in the indicated sanctions<sup>13</sup>:

- six months imprisonment for trying to smuggle over 750 kg of rare and endangered corals and clams from Ho Chi Minh City in Vietnam to the UK;
- fine of GBP 555 for three occasions of fraudulently evading a restriction on the export of ivory;
- one year of imprisonment for smuggling San Salvador rock iguanas to the UK.

The number of prosecutions varied in previous years. There were 4 prosecutions between 2007 and 2008, 21 prosecutions between 2009 and 2010 and 4 prosecutions between 2011 and 2012. Significant cases included the following which resulted in the indicated sanctions:

- a GBP 500 fine for an attempt to sell two ring tailed lemurs on the internet<sup>14</sup>;
- nine months sentence suspended for two years and GBP 3 607 cost to be paid for the illegal importation of bird eggs from the US and Australia and the illegal sale of the eggs<sup>15</sup>;
- twelve months of imprisonment for the attempted smuggling of rhino horns from the UK to China<sup>16</sup>;

<sup>12</sup> UK Border Force. "Endangered Geckos seized by Border Forces at Heathrow", March 2015, <https://www.gov.uk/government/news/endangered-geckos-seized-by-border-force-at-heathrow>.

<sup>13</sup> CITES UK Biennial Report 2013/2014, Annex 2.

<sup>14</sup> CITES UK Biennial Report 2011/2012, Annex 4.

<sup>15</sup> CITES UK Biennial Report 2009/2010, Annex 4.

- Fine of GBP 600 for the purchase and sale of barn owls (<sup>17</sup>);
- Two years suspended sentence and GBP 1 480 in cost recovery for selling elephant ivory, hippo ivory and sperm whale teeth (<sup>18</sup>).

## 2.2. Other illegal activities

Wildlife crime concerns not only wildlife trafficking but also other **crimes against endangered species such as cruelty or persecution of wildlife species**. In the UK, poaching, which covers illegal hunting, is the most common wildlife crime. Between 2011 and 2013, 44 % of intelligence submitted to the NWCUC was linked to poaching, particularly deer and fish poaching and hare coursing (NWCUC 2014, p. 20). Other common types of wildlife crimes include badger persecution, bat persecution and raptor persecution.

Badger baiting is the most common form of **badger persecution**, while quad bikes also cause harm and injury to badgers and destroy their nests. There have been instances where farmers concerned about bovine tuberculosis<sup>19</sup> have carried out unofficial and illegal culling on badgers (NWCUC 2014). With regards to **bat persecution**, the greatest concerns are linked to land and property developments where bat populations are disturbed. The most typical crime linked to bats in the UK is roost damaging and obstructing access (WSPA 2014). Furthermore, there is a link to illegal trade of bat species as live and dead bats are being offered for sale on the internet (e.g. eBay and Gumtree), as well as in newspapers (NWCUC 2014).

**Poaching**, i.e. illegal hunting, in the UK is primarily linked to deer, fish and hare. According to the NWCUC's latest strategic assessment, poachers in the UK have become more organised and sophisticated, using for instance night vision equipment, quad bikes, high powered rifles and large nets (NWCUC 2014, p. 20). Offenders often identify and take advantage of weak spots or loopholes in policies. For example, in some areas dogs are not seized when illegally hunting and thus offenders use dogs for hare coursing knowing that their dogs cannot be confiscated. Deer poaching is driven by the high value of venison. Fish poaching primarily concerns wild salmon caught in Scottish rivers. The NWCUC's strategic assessment also indicates that migrant workers, primarily from Eastern Europe, are known to poach fish for personal consumption. In order to address these problems the Angling Trust started its 'Building Bridges' initiative in 2010 to educate anglers about good practices and to integrate migrant anglers<sup>20</sup>. Finally, hare coursing is thought to be linked to the travelling community<sup>21</sup>; and hare coursing offenders are also in many cases engaged in other crimes, including anti-social behaviour, distraction burglary, metal theft, violence and intimidation (NWCUC 2014).

**Raptor persecution** is primarily linked to the poisoning, shooting and trapping of bird species. The most commonly affected species include buzzards, goshawks, peregrines, sparrowhawks, owls, hen harriers, red kites, golden eagles and white tailed eagles (NWCUC, 2014, p.25). While raptor persecution is geographically concentrated in Northern England, the other wildlife crimes mentioned above are carried out throughout the country<sup>22</sup>.

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<sup>16</sup> CITES UK Biennial Report 2009/2010, Annex 4.

<sup>17</sup> CITES UK Biennial Report 2009/2010, Annex 4.

<sup>18</sup> CITES UK Biennial Report 2007/2008, Annex A.

<sup>19</sup> A significant animal health problem in parts of the UK, creating risks to dairy and beef farming, including risks of significant financial losses as a result of the enforced culling of infected herds.

<sup>20</sup> Angling Trust. "Building Bridges with Migrant Anglers", <http://www.anglingtrust.net/page.asp?section=709>.

<sup>21</sup> The term of traveling community is collective term that describes a wide range of cultural and ethnic groups.

<sup>22</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCUC), 30 October 2015.

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Examples of recent **criminal prosecutions** and sanctions include the following (WSPA 2014, p.12):

- In 2014, three men were found guilty of hare coursing and were ordered to pay costs of GBP 600 each and fines of GBP 300 each.
- In 2013, a school building was demolished in Wales in spite of an ecological assessment that pipistrelle bats were using the building as roosts. The housing developer responsible received a GBP 600 fine.
- In 2012, a person in Scotland poisoned a buzzard and bait with carbofuran, which is an illegal poison in Scotland. The perpetrator received a GBP 365 fine.

### 2.3. Insights on organised crime and money laundering

It is estimated that global revenues generated by wildlife trafficking are around EUR 18 to EUR 24 billion per year and that the EU is a significant destination market (Europol 2011, p. 40). Couriers and postal services are used often and the internet has opened up channels for illegal trade in endangered species. According to Interpol (2011), organised crime groups in the EU in many cases use legitimate business structures to facilitate their illegal activities, including the import and retail of endangered species. According to the UK's National Crime Agency, organised crime groups involved in illegal wildlife trade are becoming increasingly flexible in their ability to generate new income (NCA 2015, p. 27). There is also increasing evidence that organised criminal groups in the EU are also involved in drug trafficking, illegal migration, fraud and trafficking of human are now also expanding to the trafficking of wildlife (Europol, 2011).

In the UK, **organised crime** in relation to illegal wildlife trade is identified as being linked to rhino horn thefts and trade, to trade in raptors and bird eggs, and to the repeated sale of traditional medicine products (Sollund and Maher 2015, p. 24). In 2014, it was estimated that a kg of rhino horns sells for around GBP 40 000 (WSPA 2014, p. 11). Given the large value of illegal trade in wildlife, criminals also use these sources to fund other illegal activities, such as drug smuggling, money laundering and violence (WSPA 2014, p. 11).

With regards to other illegal activities it seems that wildlife criminals are often involved in other types of crime. For instance, hare courses have been known to be linked to badger baiting as well. Although not necessarily linked to organised crime, wildlife criminals are also known to be involved in metal theft, rouge trader offences, violence and intimidation and anti-social behaviour (WSPA 2014). The internet increasingly helps to facilitate other wildlife crimes not only illegal wildlife trade; the role of social media in facilitating wildlife crime has also started to become significant. Offenders often post pictures about poaching and coursing on social media networks (NWCUC 2014).

Within the UK, the National Wildlife Crime Unit (NWCUC) confirms and collects intelligence on the involvement of organised criminal networks in wildlife crime. Currently 19 OCGs are identified in the UK with the involvement of 134 individuals and they are mainly linked to poaching, raptor persecution and CITES related illegal wildlife trade<sup>23</sup>.

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<sup>23</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCUC), 30 October 2015.

### 3. EFFORTS TO COMBAT WILDLIFE CRIME IN THE UK

#### KEY FINDINGS

- The CITES Convention is domestically enforced within the UK through the COTES (Control of Trade in Endangered Species) Regulation, which is currently under revision with the aim to further strengthen its effectiveness in tackling illegal wildlife trade.
- The leading Managing Authority for CITES in the UK is the Department for Environment, Food & Rural Affairs (DEFRA) and the Scientific Authorities are the Joint Nature Conservation Committee (JNCC) for fauna and the Royal Botanic Gardens (RBG) – Kew for flora.
- The National Wildlife Crime Unit (NWCU) within the UK Police Force and the UK Border Forces' specialised CITES team based at Heathrow Airport play an important role tackling wildlife crime in the UK. The NWCU's aim is to collect intelligence from a wide range of organisation on wildlife crime and to assist the Police force via the dissemination of this information.
- With regards to EU level action on illegal wildlife trade, the UK welcomes the EU Action Plan against Wildlife Trafficking and has proposed a number of specific suggestions, including for instance the strengthening of trade rules on ivory and use of development aid.
- There are wide-ranging efforts to combat wildlife crime in the UK with actions at the international and national level. International examples of cooperation include the UK's role in organising the high-level London Conference on Illegal Wildlife Trade where the London Declaration was adopted, the establishment of the Illegal Wildlife Trade Challenge Fund, support for the Global Tiger Initiative Multi Donor Trust Fund and the International Consortium on Combating Wildlife Crime (ICWC).
- Domestically the UK has set up a multi-agency body, the UK Partnership for Action Against Wildlife Crime (PAW UK), which provides support to coordinate the work of statutory and NGO organisations working to combat wildlife crime.

#### 3.1. The domestic legal framework and policies to combat wildlife crime

The CITES Convention is enforced in the United Kingdom through the **COTES (Control of Trade in Endangered Species) Regulation**<sup>24</sup>. According to the 2013/2014 CITES biennial report, a review of the COTES regulations started in 2014 and the government plans to consolidate the COTES and the Ports of Entry and Exit Regulations into one piece of legislation<sup>25</sup>. The results of the consultation process have recently been published (DEFRA, 2015a) and the new Statutory Instrument was due to come into force in October 2015 (UK Government 2015, p. 5). Nevertheless, as a result of further internal deliberation on how to take into consideration the results of the consultation process, the Regulation is still being reviewed and DEFRA's intention is to publish it as soon as possible in 2016<sup>26</sup>.

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<sup>24</sup> Available at: <http://www.legislation.gov.uk/ukxi/2009/1773/made>

<sup>25</sup> CITES UK Biennial Report 2013/2014, p. 3.

<sup>26</sup> Email exchange with DEFRA, 2015, on file with authors.



The UK is committed to the **London Declaration**<sup>27</sup> (see more information below). In its 'Self-assessment of progress on commitments in the London declaration,' the government of the UK indicates that the review of the COTES Regulation aims to better reflect the changes made to the EU Wildlife Trade Regulations. It aims to correct anomalies in the current regulation, update enforcement requirements to better reflect the evolution of wildlife crime and take into consideration the ports designated for entry and exit when bringing CITES species in and out (UK Government 2015, p. 5). As part of the London Declaration the UK government is also committed to eradicating the domestic market for illegal wildlife products.

In addition to the COTES Regulation, wildlife in the UK is protected by a wide range of domestic legislation, including the Animal Welfare Act 2006, Wildlife and Countryside Act 1981, Dangerous Wild Animals Act 1976, and the Performing Animals Act 1925. Some national level legislation actually imposes **stricter domestic requirements** on trade, taking, possession and transport related issues than is required by CITES or EU legislation. The re-export of raw ivory is not allowed in the UK and there is a tightened control on the re-export of rhino horns. Stricter domestic measures are also applied to tigers and to bear bile, paws and gall bladders<sup>28</sup>. The **Wildlife and Countryside Act 1981** makes it an offence to intentionally kill, injure or take any wild bird; or take, damage or destroy the nest of any wild bird while that nest is in use or being built or take or destroy an egg of any wild bird. Furthermore, it makes it an offence to kill, injure or take any wild animal listed as a protected species, and prohibits interference with places used for shelter or protection, or intentionally disturbing animals occupying such places. The Act also prohibits certain methods of killing, injuring, or taking wild animals<sup>29</sup>. Furthermore, the Natural Environment and Rural Communities Act of 2006 prohibits the sale, offer for sale, possession or transport for the purpose of sale of certain protected live non-native species; and the transport, offer for sale or exchange of any (wild) live or dead cetacean is prohibited by the 2010 Conservation of Habitats and Species Regulations (Crook 2014, p. 69). Finally, the Wildlife and Natural Environment (Scotland) Act 2011 compared to the Wildlife Countryside Act 1981 includes further offences in relation to non-native and invasive species<sup>30</sup>.

### 3.2. UK position towards the EU Action Plan against Wildlife Trafficking

In August 2015, the European Commission published a roadmap relating to the development of an EU Action Plan against Wildlife Trafficking, which presented three options for further actions to tackle illegal wildlife trade (European Commission 2015). In early November 2015, the UK has submitted its written feedback to the proposed action plan, which is summarised below.

The UK welcomes the Commission's initiative to publish a roadmap for tackling illegal wildlife trade and prefers Option 2 of the three possible options, under which 'the Action Plan would consist in a Communication from the Commission to the Council and the European Parliament without new legislative proposals' (European Commission 2015, p. 6). The UK believes this option reflects a holistic approach which would secure political

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<sup>27</sup> In February 2014, representatives of numerous national governments gathered in London to attend the London Conference on the Illegal Wildlife Trade and to discuss how to tackle wildlife crime issues. One of the results of this conference was the adoption of the London Declaration, which contains a number of political commitments. More details are included in the sub-section below. The Declaration is available at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/281289/london-wildlife-conference-declaration-140213.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281289/london-wildlife-conference-declaration-140213.pdf).

<sup>28</sup> CITES UK Biennial Report 2013/2014, p. 4.

<sup>29</sup> At the same time, in specific circumstances there are exceptions included in the Wildlife and Countryside Act 1981.

<sup>30</sup> CITES UK Biennial Report 2013/2014, p. 4.

commitment. DEFRA also notes that ‘any such proposals will be subject to UK parliamentary scrutiny and agreement with the Council’ (DEFRA, 2015c, p. 1).

The UK has also provided a number of specific suggestions for inclusion in the action plan, including the following:

- Strengthening rules on legal trade, in particular ivory: The UK suggests adopting its approach to not permit the trade in raw ivory.
- Enhancing high-level international political attention: The UK believes that the action plan should clearly set out a direction and aspiration to maintain and enhance global attention on the issue of illegal wildlife trade. The potential role of the forthcoming third conference on illegal wildlife trade to be held in 2016 in Vietnam is also mentioned.
- Ensuring full and effective implementation of the CITES: There is a need to demonstrate that the CITES is fully and effectively implemented in the EU and its Member States to provide global leadership.
- Use of development aid: The scaling up of the EU development aid devoted to illegal wildlife trade is recommended, with a focus on providing targeted support; for instance to the protection of landscapes and species in Africa.
- Enhancing enforcement: The UK proposes that the action plan should ‘clearly set out what the EU and its Member States are collectively trying to achieve through their enforcement activity, and to set clear and measurable objectives’ (DEFRA, 2015c, p. 3).

### 3.3. The authorities responsible for combating wildlife crime

The leading UK Managing Authority (MA) for CITES is the **Department for Environment, Food & Rural Affairs (DEFRA)**, while the **Animal and Plant Health Agency (APHA)** provides the licensing service. Within APHA there is a panel of wildlife inspectors, who undertake targeted compliance checks of CITES traders. According to the 2013/2014 CITES biennial report DEFRA has five people working on wildlife crime with 2.5 full-time equivalent staff, while the APHA has 21.57 staff working on wildlife crime issues with a total of 19.57 full-time equivalent staff<sup>31</sup>. The Government institution Joint Nature Conservation Committee (JNCC) is the Scientific Authority (SA) for fauna, while the Royal Botanic Gardens (RBG) – Kew is the SA for flora. JNCC has six members working on CITES, while there are four member of staff at RGB Kew. Furthermore, other non-ministerial departments also play an important role in wildlife crime related issues, including the National Crime Agency (NCA), the Crown Prosecution Service (CPS) and Her Majesty’s Revenue and Customs (HMRC) (Sollund and Maher 2015, p. 15).

The **UK police** are responsible for enforcement of wildlife crime within the UK borders. A standalone unit exists within the UK police force, the **UK National Wildlife Crime Unit (NWCU)**, which specialise in obtaining and collecting intelligence on wildlife crime. Given the NWCU’s prominent role in providing assistance to the police forces in tackling wildlife crime in the UK more details of their work is provided below. In addition to the police forces, the **UK Border Force** are responsible for border enforcement and have a **dedicated CITES team based at Heathrow Airport**<sup>32</sup>.

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<sup>31</sup> CITES UK Biennial Report 2013/2014, p. 7.

<sup>32</sup> CITES UK Biennial Report 2013/2014, p. 10.

The **UK Partnership for Action Against Wildlife Crime (PAW UK)**, a multi-agency group comprising representatives of statutory and non-governmental organisations involved in wildlife law enforcement in the UK, should be also mentioned (see further details below). Furthermore, there is an inter-agency group on CITES, the **UK CITES Officers Group**, who meet three times a year. According to the 2013/2014 CITES biennial report the group currently has members from DEFRA, APHA and enforcement officers from NWCU and UK Border Forces, as well as representatives of JNCC and RBG Kew<sup>33</sup>.

Other forces, such as the Wildlife Crime Enforcement Group in Wales or the dedicated team of wildlife and environmental crime prosecutors in Scotland's Crown Office and Procurator Fiscal Service (COPFS), are also playing an important role in tackling wildlife crime in the UK (WSPA 2014).

Finally, national and international **NGOs** also have an important role in combating wildlife crime in the UK, including for instance the Royal Society for the Protection of Birds (RSPB), the Royal Society for the Prevention of Cruelty to Animals (RSPCA), the World Wildlife Fund (WWF), the wildlife trade monitoring network TRAFFIC, the World Society for the Protection of the Animals (WSPA) and the Environmental Investigation Agency (EIA). For instance, in 2013 TRAFFIC and WWF UK launched a campaign to convince the UK Government about the importance of the NWCU and to provide long-term funding for the unit. In 2014, this was achieved as the Government extended funding for the unit for two years until 2016<sup>34</sup>, although funding had been and remains under threat as part of the Home Office's efforts to reduce expenditure in response to austerity policies. Furthermore, on the Crime Stoppers website<sup>35</sup>, which is run by an independent charity, any suspected wildlife crimes can be reported, which is then anonymously forwarded to the NWCU. The WSPA has recently partnered with the Metropolitan Office and the Greenspace Information for Greater London to develop a map<sup>36</sup> of wildlife crimes in London. This map enables users to access wildlife crime intelligence reported in the respective neighbours in London.

An overview of the main institutions aiming to tackle the illegal wildlife trade in the UK is presented in Figure 2.

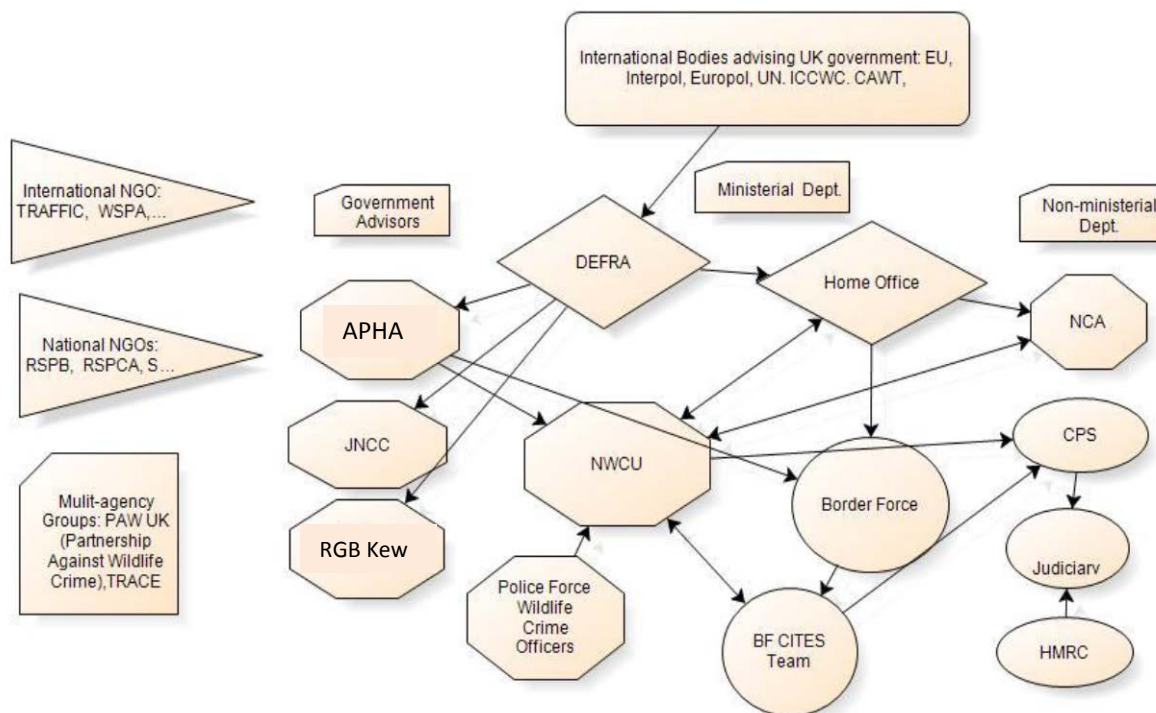
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<sup>33</sup> CITES UK Biennial Report 2013/2014.

<sup>34</sup> WWF UK. "Wildlife trade in the UK", [http://www.wwf.org.uk/what\\_we\\_do/illegal\\_wildlife\\_trade/wildlife\\_trade\\_in\\_the\\_uk2/](http://www.wwf.org.uk/what_we_do/illegal_wildlife_trade/wildlife_trade_in_the_uk2/).

<sup>35</sup> Available at: <https://crimestoppers-uk.org/>.

<sup>36</sup> Available at: <http://www.gigl.org.uk/online/>.

**Figure 2: The main UK institutions tackling illegal wildlife trade**

**Source:** Adapted from Sollund and Maher 2015, p. 16

The national government is responsible for crime involving trade in endangered species, because both trade and border protection are policy areas reserved to the UK level. In the case of other wildlife crime, particularly poaching and persecution of endangered species, the relevant authorities are usually the administrations at devolved national level; DEFRA for England, the Scottish Government for Scotland, the Welsh Government in Wales, and the Northern Ireland Executive in Northern Ireland.

### 3.3.1. The National Wildlife Crime Unit

As indicated above, the **National Wildlife Crime Unit's** main role is to obtain intelligence from a wide range of organisations and then to disseminate this information in order to assist police forces in wildlife crime investigations. The unit is currently comprised of 12 staff. Although between 2011 and 2013 the submission of intelligence has been steadily maintained (NWCU 2014) the NWCU has been experiencing problems as some police forces lack the ability to submit intelligence<sup>37</sup>. This is primarily the result of a lack of resources, issues within Force Intelligence Bureaus and the adoption of new IT systems which in turn pushes wildlife crime issues to not be effectively dealt with in Forces and to become a low priority area. Every police force across the UK is supposed to have a Wildlife Crime Coordinator and/or a Wildlife Crime Officer; nevertheless in many cases this role has not been formalised (WSPA 2014). At the same time, Scotland has for instance made efforts to establish such roles; all 14 regional police divisions have a Wildlife Crime Liaison Officer in place<sup>38</sup>.

<sup>37</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCU), 30 October 2015.

<sup>38</sup> PAW Scotland. "Who to contact to report a wildlife crime in Scotland", <http://www.gov.scot/Topics/Environment/Wildlife-Habitats/paw-scotland/what-you-can-do/report-a-wildlife-crime>.

The NWCU is in close cooperation with the UK Border Forces and recent operations have lately resulted in a higher volume of intelligence on CITES related issues<sup>39</sup>. The unit also cooperates with statutory enforcement agencies, such as Natural England, as well as with NGOs and in some cases other countries' national crime agencies. As a result of the recent increase of intelligence on CITES related issues, the NWCU has disseminated intelligence to other countries, which in some cases lead to the uptake of enforcement actions by the responsible authorities in the respective countries<sup>40</sup>.

The NWCU undertakes a strategic assessment every two years which focuses the UK's wildlife crime priorities, which are set every two years by the UK Wildlife Crime Tasking and Co-ordination Group within PAW.

The latest strategic assessment was published in 2014 and analysed the intelligence collected between 2011 and 2013 on the following six priorities (NWCU 2014):

1. Badger Persecution;
2. Bat Persecution;
3. CITES Issues;
4. Freshwater Pearl Mussels;
5. Poaching; and
6. Raptor Persecution.

The strategic assessment highlights the need to shift the approach to tackle wildlife crime and to move from the PIE (Prevention, Intelligence and Enforcement) approach to a PIER (Prevention, Intelligence, Enforcement and Reassurance) approach, with a focus on media and press issues. The importance of 'Reassurance' is linked to the objective of reassuring interested communities and redressing the loss of public confidence.

It is also interesting to note that the strategic assessment indicates that with regards to CITES related issues 'the costs associated with seizure and retention of specimens prior to court and disposal of specimens forfeited by courts impacts on the willingness of many police forces to undertake effective enforcement actions' (NWCU 2014, p. 4).

The NWCU has a quintessential role in fighting wildlife crime nevertheless its existence is threatened. NWCU is currently funded until the end of March 2016. Discussions with DEFRA and the Home Office are currently under way. Nevertheless, the future of the NWCU is not clear or guaranteed<sup>41</sup>. A recent announcement by the finance minister that DEFRA's budget will be significantly reduced in cash terms over the next five years is likely to create significant strains on funding. At the same time the NWCU has already started to work on its next strategic assessment<sup>42</sup>.

### **3.4. The level of efforts to combat wildlife crime**

With regards to the efforts to combat wildlife crime the UK has undertaken a very wide range of activities, which are summarised in the below sections.

<sup>39</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCU), 30 October 2015.

<sup>40</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCU), 30 October 2015.

<sup>41</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCU), 30 October 2015.

<sup>42</sup> Interview with Martin Sims, Chief Inspector, Head of UK National Wildlife Crime Unit (NWCU), 30 October 2015.

### 3.4.1. Cooperation with international partners

As indicated above, in February 2014, the **London Conference on Illegal Wildlife Trade** (IWT) was an international event organised by the UK government which brought together global leaders to focus on how to tackle illegal wildlife trafficking and was chaired by Foreign Secretary William Hague and attended by the Prince of Wales, the Duke of Cambridge and Prince Harry. The conference was concluded with the adoption of the **London Declaration on the Illegal Wildlife Trade** (2014), which contains 25 commitments within five overarching objectives for the Parties of the declaration to tackle illegal wildlife trade, including the UK. The five overarching aims are the following:

- to eradicate the market for illegal wildlife products;
- to ensure effective legal frameworks and deterrents;
- to strengthen law enforcement;
- to ensure sustainable livelihoods and economic development; and
- to identify the way forward.

As a follow-up to the London Conference in March 2015 a second high-level conference on illegal wildlife trade was held in Kasane, Botswana for which an overall progress report was prepared. Furthermore, 25 countries, including the UK, and nine international organisations, such as Interpol and UNDP, provided a self-assessment report to review their progress since the first conference. The third IWT Conference is planned to take place in Vietnam in late 2016.

The UK's self-assessment report provides a detailed overview of the countries' actions to tackle illegal wildlife trade. Furthermore, in February 2014 the Government published the '**UK commitment to action on the illegal wildlife trade**' and later in March 2015 an update on this commitment, both of which also provide the readers a full picture of the UK's actions on combating illicit wildlife trade.

In 2014, DEFRA within the UK Government, established the **Illegal Wildlife Trade (IWT) Challenge Fund** under which it committed GBP 13 million over 4 years (2014-2018) to support projects around the world tackling illegal wildlife crime. DEFRA worked closely with the Department for International Development (DfID) to establish the fund<sup>43</sup>.

As part of the first round of project calls in 2014, 14 projects were selected through a competitive process and five additional projects were funded via DEFRA's Darwin Biodiversity Initiative<sup>44</sup>. In total, the 19 projects are worth around GBP 5.3 million (HM Government 2015, p. 3). The projects supported cover a wide range of countries and species. While most of the projects focus on enforcement issues some specifically address the demand for the products of illegal wildlife trade. These demand-side projects include the following (HM Government 2015, p.3):

- 'Protecting wildlife by linking communities and conservation in Mozambique': This project addresses threats to rhinos by creating alternative wildlife-based sources of income for communities in Kruger, Mozambique.
- 'Bi-national collaboration to eradicate wildlife trafficking in Belize and Guatemala': While this project aims to improve enforcement actions in Belize and Guatemala it also

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<sup>43</sup> CITES UK Biennial Report 2013/2014.

<sup>44</sup> The Darwin Biodiversity Initiative is grant scheme by the UK Government which supports locally based projects aiming to protect biodiversity and the natural environment.

addresses the improvement of livelihoods in rural communities who are close to the wildlife trafficking routes and aims to raise their awareness.

- ‘Educational Children’s Videos Reduce Endangered Species Demand in Viet Nam’: This project specifically focuses on addressing the demand for elephant, tiger and pangolin derivatives and builds on a recent rhino horn demand reduction campaign. Animated videos are created for children, which are then disseminated on national television.
- ‘A recipe for reducing ivory consumption in China’: This project aims to actively engage the public in ivory demand reducing campaigns by utilising social media and working together with business leaders.
- ‘Building capacity for pro-poor responses to wildlife crime in Uganda’: This project provides support to Uganda to understand the drivers of wildlife crime trade and at the same time improve the livelihoods of poor people.
- ‘Reducing rhino horn demand through behavioural change in Vietnam’: This behavioural change campaign aims to tackle the demand for rhino horn using a strong science-based approach.

The second round of calls for project applications under the IWT Challenge Fund has closed on 12 October 2015.

Although not linked to the IWT Challenge Fund the UK Government focuses on addressing the demand-side of illegal wildlife trade in other ways as well. For instance, DEFRA has recently commissioned a consortium including WWF-UK, TRAFFIC and Imperial College London to undertake research on how to reduce the demand for elephant ivory and rhino horn. Once the research is completed the results will be widely disseminated (HM Government 2015, p. 13).

With regards to other financial support the UK Government also donated USD 500,000 to the Global Tiger Initiative Multi Donor Trust Fund, out of which USD 150 000 was specifically allocated to address the demand-side of the illegal trade in tigers (UK Government 2015, p.3).

The UK has also supported the work of the International Consortium on Combating Wildlife Crime (ICWC)<sup>45</sup> through the following actions (HM Government, 2014):

- Funding of the ICWC co-ordinator post.
- Supporting training workshops for enforcement agencies.
- Support for the development of an anti-money laundering and asset recovery manual.

With regards to **enforcement actions**, the UK has participated in and supported a number of operations, including the following:

- The Metropolitan Office has launched Operation Charm in 1995 which is a police initiative against the illegal trade in endangered species in the UK.
- The UK has previously participated in Operation Cobra I, II and is currently involved in Operation Cobra III, which is an international law enforcement operation targeting the illegal trade in endangered species. Operation Cobra III is currently in its third year and currently includes enforcement teams, the NWCU, Border Forces, Europol and law

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<sup>45</sup> The ICWC is a collaboration between CITES, INTERPOL, the United Nations Office on Drugs and Crime, the World Bank and the World Customs Organization with the aim to tackle wildlife crime and forest crime.

enforcement agencies across 62 countries. The Cobra initiatives have resulted in 200 arrests, and in the UK the NWCU has supported police forces in 28 investigations<sup>46</sup>.

- The UK is also supporting Operation GAPIN, which is an international enforcement initiative co-ordinated by the World Customs Organisation (UK Government 2015, p. 7).

Other cooperative enforcement activities were also undertaken. While the 2013/2014 CITES biennial report indicates that the UK undertook controlled deliveries of ivory to France and Belgium, the 2011/2012 CITES biennial report indicates that the UK also exchanged intelligence with Hong Kong and Chinese Customs authorities (on ivory trafficking), the Czech Republic (on endangered parrot species), Finland and Sweden (on illegal trade of CITES listed birds species' eggs). Furthermore, the UK provided support to Interpol<sup>47</sup>.

In addition, the UK has provided financial support for the **EU-TWIX database**, which is an enforcement tool supporting wildlife law enforcement officials in the EU Member States (HM Government 2015).

Finally, according to the latest CITES biennial report the UK has also supported a number of **capacity building workshops and events**. Examples include the following<sup>48</sup>:

- In March 2014, DEFRA organised a two day CITES workshop targeting MAs and SAs from UK overseas territories.
- In 2013, the UK hosted a delegation of the Turkey CITES Authorities.

### 3.4.2. Actions within the UK

As earlier discussed the **National Wildlife Crime Unit** has a crucial role in tackling wildlife crime within the UK, it is in close cooperation with many UK organisations, including the Border Forces, the Police and other Statutory Agencies and NGOs, and their work is guided by strategic assessments undertaken every two years. The UK has also set up a multi-agency body, the **UK Partnership for Action Against Wildlife Crime (PAW UK)**, which provides support to coordinate the work of statutory and NGO organisations working to combat wildlife crime. The PAW Steering Group consists of representatives of the Police, UK Border Agency, DEFRA, Home Office, Natural Resources Wales, Scottish Natural Heritage, Joint Nature Conservation Committee, Royal Botanic Gardens Kew, Welsh Government, Northern Ireland Environment Agency, amongst other statutory nature conservation organisations and NGOs. The Steering Group meets twice every year and coordinates PAW's work, establishes the overarching objectives and also sets up working groups. There are also three country groups, covering Northern Ireland, Scotland and Wales<sup>49</sup>. Furthermore, as indicated above the PAW's Tasking and Co-ordination Group sets the UK's wildlife crime priorities every two years. An overview of PAW's structure is shown in Figure 3.

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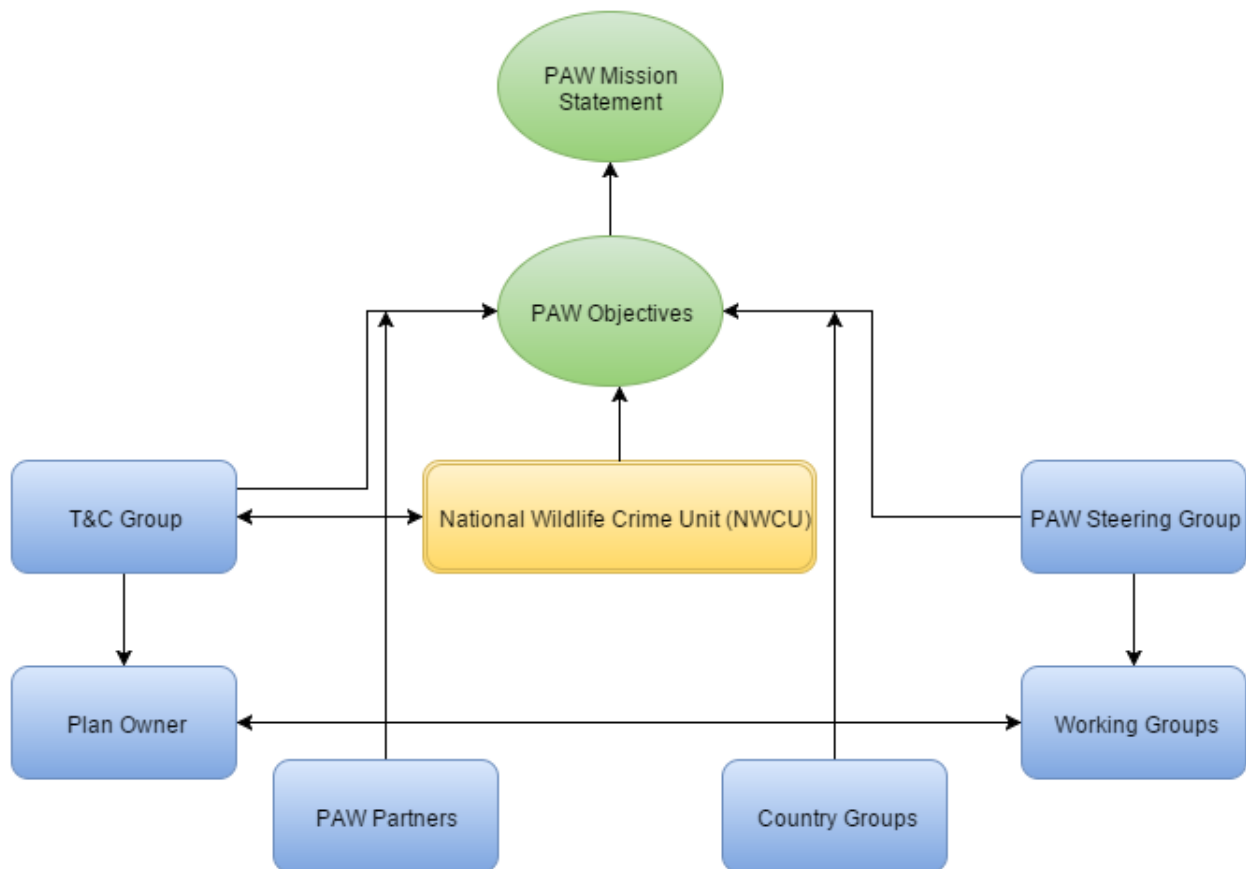
<sup>46</sup> Gov.uk. "Border Force and police fight wildlife crime in global operation", 19 June 2015, <https://www.gov.uk/government/news/border-force-and-police-fight-wildlife-crime-in-global-operation>.

<sup>47</sup> CITES UK Biennial Report 2011/2012.

<sup>48</sup> CITES UK Biennial Report 2013/2014.

<sup>49</sup> NWCU. "PAW UK", <http://www.nwcu.police.uk/about/the-structure-of-paw-uk/>.



**Figure 3: Overview of the structure of PAW**

**Source:** NWCU, <http://www.nwcu.police.uk/about/the-structure-of-paw-uk/><sup>50</sup>

DEFRA has also created a **CITES Sustainable Users Group** for the private sector and holds meetings with key stakeholders to discuss the CITES related issues.

As mentioned above the UK is also working to improve its domestic regulation on wildlife trade, the **Control of Trade in Endangered Species (COTES)** (see details above).

In 2013, a **database of Rhino Horn DNA** was created in the UK in order to prevent the trading of rhino horns stolen from museums or the illegal killing of zoo animals. With this database the UK aims to have a wide impact on organised crime groups operating within the UK, as well as in Europe. In addition, the UK has introduced stricter conditions for the re-export of rhino horn (HM Government 2015, p.16).

Finally, various **awareness raising campaigns** have also been launched within the UK either by the UK Government or NGOs. In March 2013, DEFRA launched the 'If They Are Gone...' campaign, which aims to raise awareness within the public on wildlife crime targeting rhinos, tigers, elephants and orangutans. One of the aims of the campaign was to achieve that the public is more concerned about the source of various products and questions whether there are any parts of the bought products which contain parts of the endangered species<sup>51</sup>. Another example is WWF's campaign, Souvenir Alert, which is a joint

<sup>50</sup> NWCU, "PAW UK", <http://www.nwcu.police.uk/about/the-structure-of-paw-uk/>.

<sup>51</sup> Gov.uk., "If They're Gone...campaign supports World Rhino Day", 22 September 2013, <https://www.gov.uk/government/news/if-theyre-gone-campaign-supports-world-rhino-day>.

initiative between WWF, DEFRA and HM Revenues & Customs and aims to raise awareness on how the souvenir industry can contribute to illegal wildlife trade<sup>52</sup>.

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<sup>52</sup> WWF UK. "Tackling the UK's illegal trade in wildlife", [http://www.wwf.org.uk/what\\_we\\_do/illegal\\_wildlife\\_trade/tackling\\_the\\_uk\\_s\\_illegal\\_trade\\_in\\_wildlife.cfm](http://www.wwf.org.uk/what_we_do/illegal_wildlife_trade/tackling_the_uk_s_illegal_trade_in_wildlife.cfm).

## 4. CONCLUSIONS

This in-depth analysis showed that the illegal trade of wildlife and other wildlife crimes are a significant problem in the UK. With regards to wildlife trafficking, the UK is primarily a transit and destination country and a wide range of species are affected. The number of seizures is high, many of which take place at Heathrow Airport. With regards to other wildlife crimes, the most common ones are linked to poaching, badger persecution, bat persecution, deer and fish poaching, hare coursing and raptor persecution. Links between wildlife crime and organised crime groups have also been identified in the UK, primarily linked to rhino horn thefts and trade, to trade in raptors and bird eggs, and to the repeated sale of traditional medicine products. According to Martin Sims, Chief Inspector at the National Wildlife Crime Unit, currently 19 organised crime groups with approximately 134 individuals have been identified and linked to wildlife crimes in the UK.

The review of relevant actors shows that there is a well-established institutional set up in the UK aiming to tackle wildlife crime. Apart from the Managing Authority and the Scientific Authorities of the CITES, three actors have been identified to play a crucial role: the National Wildlife Crime Unit (NWCU) within the UK Police Force, the UK Border Forces' specialised CITES team based at Heathrow Airport and the UK Partnership for Action Against Wildlife Crime (PAW UK), a multi-agency group comprising representatives of statutory and non-governmental organisations involved in wildlife law enforcement in the UK. Furthermore, national and international NGOs also contribute to combating wildlife crime. Despite the quintessential role it played, the NWCU's existence is threatened by current budget cuts in the UK Government.

With regards to the UK's domestic regulation, it is yet to be seen what amendments will be introduced to the revised Control of the Trade in Endangered Species (COTES) Regulation and what impacts these will have on its effectiveness.

The UK has undertaken a wide range of both international and national actions to tackle wildlife crime. Such actions include the organisation of high-level conferences, establishing and/or financially supporting various initiatives, as well as information dissemination and capacity building activities.

Overall, the UK has been active in fighting illegal wildlife trade and other wildlife crimes. At the domestic level the current changes to the COTES Regulation and to the NWCU's budget will have an impact on its efforts to combat wildlife crime in the UK. At the international level the UK should maintain its prominent role in supporting actions to tackle wildlife trafficking in order to keep the momentum and to provide a good practice example to other countries as well.

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## **ANNEX**

The author conducted an interview with:

- Martin Sims, Chief Inspector, Head of Unit of UK National Wildlife Crime Unit (NWCU), 30 October 2015



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