



## DEBATE PACK

Number CDP 2019/0070, 18 March 2019

# Wildlife crime

This pack has been prepared ahead of the debate to be held in Westminster Hall on Wednesday 20 March 2019 from 2.30-4pm on wildlife crime. The debate will be opened by Christian Matheson MP.

The House of Commons Library prepares a briefing in hard copy and/or online for most non-legislative debates in the Chamber and Westminster Hall other than half-hour debates. Debate Packs are produced quickly after the announcement of parliamentary business. They are intended to provide a summary or overview of the issue being debated and identify relevant briefings and useful documents, including press and parliamentary material. More detailed briefing can be prepared for Members on request to the Library.

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# 1. Background

## 1.1 Wildlife law

The [National Wildlife Crime Unit](#) defines wildlife crime as any action which contravenes current legislation governing the protection of the UK's wild animals and plants.

Examples given include:

- Hare Coursing
- Deer poaching
- Fish poaching
- Badger persecution – including baiting, snaring, shooting, and disturbance of setts
- Bat persecution
- Egg theft / collection
- Bird of Prey persecution – through poisoning, trapping, shooting, disturbance of nest and/or theft of chicks
- The trade in ivory, tortoises, rhino horn and other protected species covered by CITES (Convention on International Trade in Endangered Species) including caviar, Traditional Chinese Medicines, and orchids)
- Non-registration of certain birds and animals that require licensing through DEFRA/Animal Health if kept in captivity or sold<sup>1</sup>

The Gov.uk page for the [Partnership for Action Against Wildlife Crime](#) states that the UK's wildlife crime priorities are set every two years. The current priorities are listed as:

- badger persecution
- bat persecution
- illegal trade in CITES species
- freshwater pearl mussels
- poaching (deer, fish & hare coursing)
- raptor persecution.<sup>2</sup>

This briefing paper provides information on the legislation relating to some high-profile wildlife offences, and the enforcement regime currently in place.

The key legislation includes:

- The [Hunting Act 2004](#) governs some of the most high-profile offences. It prohibits both hare coursing and hunting with dogs. Further details on these offences are given below.

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<sup>1</sup> NWCU, [What is wildlife crime?](#) [accessed 18 March 2019]

<sup>2</sup> Gov.uk, [Partnership for Action Against Wildlife Crime](#) [accessed 18 March 2019]

- The [Protection of Badgers Act 1992](#) consolidated offences linked to harming badgers or their setts, including badger baiting with dogs. Badger baiting is prohibited by separate legislation in Northern Ireland.<sup>3</sup>
- The [Ivory Act 2018](#) prohibits the commercial use of ivory items or those containing ivory regardless of their age, with some exceptions. The House of Commons Library [briefing paper on the Ivory Bill](#) provides information about trade in ivory.

The House of Commons Environmental Audit Committee has reported twice on the subject of wildlife crime: in [2004](#) and [2012](#). The summary of the 2012 report stated:

Wildlife law has been amended so many times in response to new wildlife crime threats that it is too complex for non-specialist police and prosecutors to apply effectively and for the public to fully appreciate. All our witnesses thought that a consolidation of the law was long overdue.<sup>4</sup>

The Government response agreed that “that the law in this area could be modernised and simplified” and pointed to the work of the [Law Commission](#).<sup>5</sup> The Law Commission’s website includes a [portal](#) to information on their work in this area.<sup>6</sup>

## 1.2 Enforcement

A [memorandum of understanding](#) has been published setting out the roles and responsibilities of Natural England, Natural Resources Wales, the Crown Prosecution Service (CPS) and the police so they can work together and help each other to prevent and take action against wildlife crime. This explains the following regarding investigations and legal proceedings in England:

In England, the Police are responsible for investigating most offences against protected species, with assistance from NE where their resources allow. NE lead on investigations involving damage to Sites of Special Scientific Interest (SSSI), animals under the Wildlife Incident Investigations Scheme (WIIS) and breaches of species licences that it issues. The Police provide assistance to NE where their resources allow.

[...]

The decision whether to commence criminal proceedings rests with the appropriate prosecuting body (Natural England, Natural Resources Body for Wales or the Crown Prosecution Service). Nonetheless, enforcement action taken by one organisation does not preclude another taking action if considered appropriate, provided there is no double jeopardy or other abuse of process issue.<sup>7</sup>

<sup>3</sup> [The Wildlife \(Northern Ireland\) Order 1985](#) as amended by [The Wildlife and Natural Environment Act \(Northern Ireland\) 2011](#)

<sup>4</sup> Environmental Audit Committee, [Wildlife Crime](#), 12 September 2012, HC 140 2012-13, p. 3

<sup>5</sup> Environmental Audit Committee, [Wildlife Crime: Government Response to the Committee’s Third Report of Session 2012–13](#), 12 March 2013, HC 1061, para 7

<sup>6</sup> Law Commission, [Wildlife Law](#) [accessed 19 March 2019]

<sup>7</sup> Natural England et al., [A memorandum of understanding on the prevention, investigation and enforcement of Wildlife Crime](#), 2015

### Partnership for Action Against Wildlife Crime

The [Partnership for Action Against Wildlife Crime](#) (PAW UK) is a multi-agency body comprising representatives of statutory and non-government organisations working together to combat wildlife crime. Its objectives are to reduce wildlife crime through effective and targeted enforcement, better regulation and improved awareness.

The PAW UK liaison group comprises:

- Government departments and agencies (Defra; Home Office; Crown Prosecution service; Border Force);
- Devolved administrations;
- Statutory bodies (Joint Nature Conservation Committee; Royal Botanic Gardens Kew);
- Regulatory bodies (Natural England; Environment Agency; Animal and Plant Health Agency); and
- Police (National Wildlife Crime Unit).

### National Wildlife Crime Unit

The [National Wildlife Crime Unit](#) (NWCU) is a small specialist police unit responsible for assisting local police forces with dealing with wildlife crimes.

The NWCU's Chief Inspector Lou Hubble told the Ivory Bill Committee in June 2018 that her team comprised 12 people.<sup>8</sup>

The main remit of the NWCU is explained as follows:

The main role of the UK National Wildlife Crime Unit (NWCU) is to assist in the prevention and detection of wildlife crime. We do this by obtaining and disseminating information from a wide range of organisations and by assisting police forces in wildlife crime investigation. We produce analysis which highlights local or national threats. We are also the conduit between police forces and PAW partners.<sup>9</sup>

The NWCU's [strategic assessment of UK wildlife crime](#) (divided into conservation and non-conservation priorities) was published in June 2018.

## 1.3 Hunting with dogs

The [Hunting Act 2004](#) bans the hunting with dogs of all wild mammals, and all hare coursing, in **England and Wales**. The following House of Commons Library briefing papers provide more detail:

- [The Hunting Bill 2002-03](#)
- [The Hunting Bill 2003-04 and the Parliament Act](#)

There are some exemptions set out in Schedule 1 of the Act, which allow hunting activities to take place in limited circumstances and with the consent of the occupier or owner of the land, such as:

- ratting and rabbiting;
- stalking and flushing out with up to two dogs; and

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<sup>8</sup> [Ivory Bill, Second sitting](#), col 41

<sup>9</sup> NWCU, [About](#) [accessed 18 March 2019]

- using a single dog under the ground to flush out wild mammals, such as foxes, in order to protect birds kept for shooting.

A person found guilty of an offence under the Act faces a fine, and could have their dogs, vehicles or articles used in hunting confiscated.<sup>10</sup> The Act does not prohibit forms of hunting in which dogs follow a scent laid along a specified route. Trail hunting involves urine from animals such as foxes, deer and hare being used to lay a trail for hounds to follow. Drag hunting involves hounds following an artificially laid scent not derived from animals.<sup>11</sup>

There have been successful prosecutions under the Act, but it has been reported that court judgements have also led the enforceability of the Act to be questioned.<sup>12</sup> In response to this the Crown Prosecution Service has produced a guide to the Act.<sup>13</sup>

There are differing opinions on the Act. The [RSPCA](#) states that “the vast majority of the British public support the Hunting Act”, estimating this support at “typically 70-80 per cent”.<sup>14</sup> The [League Against Cruel Sports](#) recommends a number of amendments to “strengthen” the Hunting Act, stating that “unfortunately we believe that illegal hunting with dogs by organised hunts is very common across the country, while there are very few prosecutions”.<sup>15</sup> The [Countryside Alliance opposes the Hunting Act and](#) includes among the objectives of its “Campaign for Hunting”:

To continue to oppose the Hunting Act 2004 and to expose it for what it is: bad for the rural economy, bad for rural communities, bad for animal welfare and a waste of police resources.<sup>16</sup>

The Conservative Party manifesto for the 2015 general election contained a commitment to repeal the Hunting Act. More details are given in the Library briefing paper on [Amending the Hunting Act 2004](#). The then Government attempted to change the law on fox hunting in 2015 to permit multiple dogs to be used to stalk and flush foxes, but the proposal was abandoned.<sup>17</sup> The 2017 Conservative manifesto committed to hold a free vote on repealing the Hunting Act, but Prime Minister Theresa May decided not to hold this vote since, as Defra Minister George Eustice said, she had “listened to the mood of the country”.<sup>18</sup>

<sup>10</sup> Section 6 of the Act states the liability as a fine not exceeding level 5 on the standard scale. The [Sentencing Council](#) explains that level 5 fines are unlimited for offences committed after 13 March 2015, and up to £5,000 for offences committed before this date.

<sup>11</sup> RSPCA, [Fox hunting - Keep the Ban](#) [accessed 19 March 2019]

<sup>12</sup> See for example *The Telegraph*, [Hunting conviction rates fall to all time low as campaigners say act is 'in tatters'](#), 10 August 2018 and *The Guardian*, [Foxhunting ban being ignored, say environmental groups](#), 26 December 2018

<sup>13</sup> CPS, [The Hunting Act 2004: Legal Guidance](#) [accessed 18 March 2019]

<sup>14</sup> RSPCA, [Fox hunting - Keep the Ban](#) [accessed 19 March 2019]

<sup>15</sup> LAC, [Strengthen the Hunting Act](#) [accessed 19 March 2019]

<sup>16</sup> Countryside Alliance, [Campaign for Hunting](#) [accessed 19 March 2019]

<sup>17</sup> BBC News, [Fox-hunting: SNP forces Cameron to delay planned Commons vote](#), 14 July 2015

<sup>18</sup> [HC Deb 635](#) col 388

The Labour Party states it would “enhance and strengthen the Hunting Act, closing loopholes that allow for illegal hunting of foxes and hares”.<sup>19</sup> A [BBC News article](#) during the 2017 general election campaign analysed the electoral significance of the Hunting Act.<sup>20</sup>

Hunting foxes with dogs remains legal in **Northern Ireland**. Brian Wilson, a Green Party member of the Northern Ireland Assembly, introduced a [Hunting Bill](#) to the Assembly in November 2010. The Bill was defeated at Second Stage in December 2010.<sup>21</sup>

Hunting with dogs in **Scotland** is prohibited under the [Protection of Wild Mammals \(Scotland\) Act 2002](#). Section 2 of the Act includes an exemption which allows any number of dogs to be used for the purpose of flushing a wild mammal from cover. This contrasts with the law in England where a maximum of two dogs is allowed under the Hunting Act.<sup>22</sup>

## 1.4 Hare coursing

Hare coursing is the pursuit of hares with greyhounds and other sighthounds, which chase the hare by sight and not by scent. In addition to organised hare coursing as a competition, there is also hare coursing as a form of poaching. While anti-poaching laws could be used to prosecute such activities, the [International Fund for Animal Welfare](#) explains that the Hunting Act is often used due to the higher penalties it allows.<sup>23</sup> Unlike the offence of hunting with dogs, being present at a hare coursing event, even as a spectator, is an offence under the Act.<sup>24</sup>

A recent initiative against hare coursing is [Operation Galileo](#), which aims to tackle offenders and raise awareness of the problems associated with hare coursing. In August 2018 Operation Galileo was co-ordinated across six police forces in the East of England. Hertfordshire Constabulary said:

Operation Galileo is targeting Hare Coursing throughout the East of England. As part of this operation there are special days of action where Wildlife Crime Officers will be carrying out proactive patrols along with other officers who will receive special local briefings and pay attention to hotspot areas within their districts, dealing robustly with offenders.<sup>25</sup>

Hare coursing was banned in Northern Ireland by the [Wildlife and Natural Environment Act](#) (Northern Ireland) 2011.<sup>26</sup> It is prohibited in Scotland by the [Protection of Wild Mammals \(Scotland\) Act 2002](#).

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<sup>19</sup> Labour Party, [Animal Welfare Plan](#) [accessed 19 March 2019]

<sup>20</sup> BBC News, [Is fox hunting an election issue?](#), 3 June 2017

<sup>21</sup> Northern Ireland Assembly, [Minute of Proceedings No. 28-10/11](#), 15 December 2010

<sup>22</sup> [The Protection of Wild Mammals \(Scotland\) Act 2002](#)

<sup>23</sup> IFAW, [The Hunting Act explained](#) [accessed 18 March 2019]

<sup>24</sup> CPS, [The Hunting Act 2004: Legal Guidance](#) [accessed 18 March 2019]

<sup>25</sup> Hertfordshire Constabulary, [Joining Forces to Tackle Hare Coursing](#), 29 August 2018

<sup>26</sup> Department of the Environment, [Wildlife and Natural Environment Act \(Northern Ireland\) 2011: Explanatory notes](#), p. 11

## 2. Statistics

### 2.1 Wildlife crime prosecutions and convictions

The Ministry of Justice (MoJ) publishes statistics on prosecutions and convictions for wildlife offences under various pieces of legislation:<sup>27</sup>

- Wildlife and Countryside Act 1981
- Deer Act 1991
- Protection of Badgers Act 1991
- Wild Mammals (Protection) Act 1996
- Hunting Act 2004

Data is available for England and Wales between 2013 and 2017 (the 2018 data is scheduled to be released in May 2019). During this period, there were **585 prosecutions and 323 convictions** for offences under these laws.

**In 2017, the latest full year of data, there were 71 prosecutions for these offences.** This was lower than in previous years, particularly in comparison to 2013, when there were 180 prosecutions for these offences.

In 2017, 52 of the prosecutions were under the Hunting Act 2004, 6 under the Deer Act 1991 and 6 under the Protection of Badgers Act 1996.

Prosecutions under the Hunting Act 2004 include a breakdown by specific offence. The majority of prosecutions over the last five years (2013-17) were for 'hunting a wild mammal with a dog', and the remaining prosecutions were mainly for 'participating in or attending a hare coursing event'.

The annual figures in included in table 1.

Note that these statistics provide only a partial view of prosecutions for wildlife crime. This is because they only show the principal offence, which is the most severe offence for which a defendant is prosecuted or convicted. If a defendant is, for example, convicted of a wildlife crime and another offence with a harsher sentence, the wildlife crime will not show up in the main statistics.

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<sup>27</sup> MoJ, [Criminal justice statistics quarterly: December 2017](#): 'Experimental statistics: Principal offence proceedings and outcomes by Home Office offence code data tool'

**TABLE 1: ANNUAL PROSECUTIONS AND CONVICTIONS FOR WILDLIFE OFFENCES, ENGLAND AND WALES**

	2013	2014	2015	2016	2017	Total
<b><u>PROSECUTIONS</u></b>	180	89	135	110	71	<b>585</b>
Offences under <b>Wildlife and Countryside Act 1981</b> <sup>(b)</sup>	11	5	3	8	5	<b>32</b>
Offences under <b>Deer Act 1991</b>	9	2	13	25	6	<b>55</b>
Offences under <b>Protection of Badgers Act 1992</b>	50	18	26	16	6	<b>116</b>
Offences under <b>Wild Mammals (Protection) Act 1996</b>	0	0	1	4	2	<b>7</b>
Offences under <b>Hunting Act 2004</b> <sup>(c)</sup> : <i>of which</i>	110	64	92	57	52	<b>375</b>
Hunting a wild mammal with a dog	87	60	84	49	49	329
Knowingly permitting land to be entered or used in the course of hunting a wild mammal with dogs	0	1	0	0	0	1
Knowingly permitting a dog to be used in the course of hunting a wild mammal	0	0	0	2	2	4
Participating in a hare coursing event	12	0	8	6	1	27
Attending a hare coursing event	11	3	0	0	0	14
<b><u>CONVICTIONS</u></b>	99	49	71	66	38	<b>323</b>
Offences under <b>Wildlife and Countryside Act 1981</b> <sup>(b)</sup>	9	3	0	0	3	<b>15</b>
Offences under <b>Deer Act 1991</b>	8	0	11	18	5	<b>42</b>
Offences under <b>Protection of Badgers Act 1992</b>	26	11	14	13	6	<b>70</b>
Offences under <b>Wild Mammals (Protection) Act 1996</b>	0	0	1	4	2	<b>7</b>
Offences under <b>Hunting Act 2004</b> <sup>(c)</sup> : <i>of which</i>	56	35	45	31	22	<b>189</b>
Hunting a wild mammal with a dog	44	35	41	29	21	170
Knowingly permitting land to be entered or used in the course of hunting a wild mammal with dogs	0	0	0	0	0	0
Knowingly permitting a dog to be used in the course of hunting a wild mammal	0	0	0	2	1	3
Participating in a hare coursing event	4	0	4	0	0	8
Attending a hare coursing event	8	0	0	0	0	8

Source: Ministry of Justice Experimental statistics: Principal offence proceedings and outcomes by Home Office offence code data tool

Notes: a) The figures presented relate to defendants for whom these offences were the principal offences for which they were dealt with. When a defendant has been found guilty of two or more offences it is the offence for which the heaviest penalty is imposed. Where the same disposal is imposed for two or more offences, the offence selected is the offence for which the statutory maximum penalty is the most severe.

b) Offences under Wildlife and Countryside Act 1981 are 'schedule 5 and schedule 6 - killing, injuring or taking certain wild animals'; offences under the Protection of Badgers Act are 'offences of cruelty to badgers and special protection for badgers and their setts'; the offence under Wild Mammals (Protection) Act 1996 is 'cruelty to a wild

c) There were no prosecutions for 'Knowingly facilitating a hare coursing event', 'Permitting land to be used for the purpose of a hare coursing event', 'Entering a dog for a hare coursing event', 'Permitting a dog to be entered for a hare coursing event', or 'Controlling or handling a dog at a hare coursing event' - also offences under Hunting Act 2004.

## 2.2 Prosecutions and convictions under the Hunting Act 2004

A longer time series, from 2005 to 2018, is available for prosecutions and convictions under the Hunting Act 2004.<sup>28</sup> These statistics are for England and Wales.

Between the introduction of the Hunting Act and the end of December 2017, a total of **778 individuals were proceeded against** and **474 convicted**. This represents a conviction ratio of 60%.<sup>29</sup>

Again, this represents the number of individuals prosecuted and convicted for an offence under the Hunting Act where that was the *principal offence*. A defendant may be charged with several offences and the principal defence is the one which carries the severer sentence.

The MoJ also publishes data on sentencing. **Most offenders (88%) were ordered to pay a fine** and the remainder either received a discharge or a more severe sentence. No immediate custodial sentences were imposed.

**Most fines were less than £250** and the average (mean) fine in 2017 was £231.

Table 2 shows the number and outcome of proceedings by year and the average fines imposed.

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<sup>28</sup> Ibid: 'Outcomes by offence data tool'.

<sup>29</sup> The conviction ratio can be calculated as the number of convictions as a proportion of the number of proceedings. This gives a measure of the relative number of defendants who are found guilty within a given year for a certain offence, when compared with the number who are prosecuted that year for the same offence.

**TABLE 2: OFFENCES UNDER THE HUNTING ACT 2004 PROSECUTIONS AND OUTCOMES**

By calendar year	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Cautions issued	1	0	8	4	8	11	1	1	2	0	3	0	4	43
<b>Proceeded against</b>	<b>2</b>	<b>11</b>	<b>62</b>	<b>44</b>	<b>92</b>	<b>49</b>	<b>72</b>	<b>81</b>	<b>110</b>	<b>64</b>	<b>92</b>	<b>57</b>	<b>52</b>	<b>788</b>
Outcome of proceedings:														
<b>Convicted</b>	<b>2</b>	<b>5</b>	<b>48</b>	<b>33</b>	<b>59</b>	<b>36</b>	<b>56</b>	<b>46</b>	<b>56</b>	<b>35</b>	<b>45</b>	<b>31</b>	<b>22</b>	<b>474</b>
Sentence:														
Absolute Discharge	0	0	0	1	2	0	4	0	0	0	0	0	0	7
Conditional Discharge	0	0	6	7	4	2	6	2	9	0	5	1	0	42
Fine	2	5	41	25	53	33	45	44	47	35	39	26	22	417
Total Community Sentence	0	0	1	0	0	1	0	0	0	0	0	0	0	2
Referral Order	0	0	1	0	0	1	0	0	0	0	0	0	0	2
Suspended Sentence	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Compensation (primary disposal)	0	0	0	0	0	0	0	0	0	0	1	4	0	5
Average Fine (£)	..	£380	£283	£278	£279	£135	£278	£322	£224	£312	£239	£298	£231	..

Source: Ministry of Justice *Criminal Justice System Statistics publication: CJS Outcomes by Offence 2006 to 2016: Pivot Table Analytical Tool for England and Wales; Criminal justice system statistics quarterly: December 2017, Outcomes by Offences tables.*

Notes: a) The figures relate to defendants for whom these offences were the principal offences for which they were dealt with. When a defendant has been found guilty of two or more offences it is the offence for which the heaviest penalty is imposed. Where the same disposal is imposed for two or more offences, the offence selected is the offence for which the statutory maximum penalty is the most severe.

b) Every effort is made to ensure that the figures presented are accurate and complete. However, it is important to note that these data have been extracted from large administrative data systems generated by the courts. As a consequence, care should be taken to ensure data collection processes and their inevitable limitations are taken into account when those data are used.

c) Figures for prosecutions in 2008 will exclude data for Cardiff magistrates' court for April, July and August 2008.

d) Values refers to number of defendants by outcome in any given year.

e) The conviction ratio can be calculated as the number of convictions as a proportion of the number of proceedings. This gives a measure of the relative number of defendants who are found guilty within a given year for a certain offence, when compared with the number who are prosecuted that year for the same offence.

### 3. News items

BBC News Online

**Bid to close loopholes in Scottish fox hunting ban**

9 January 2019

<https://www.bbc.co.uk/news/uk-scotland-scotland-politics-46813439>

Independent

**National Trust bans fox-hunt packs after 'terriermen' filmed and fox disembowelled**

4 January 2019

<https://www.independent.co.uk/news/uk/home-news/national-trust-fox-hunting-ban-pack-south-shropshire-portman-dorset-kingston-lacy-terriermen-a8711351.html>

Guardian

**Foxhunting ban being ignored, say environmental groups**

26 December 2018

<https://www.theguardian.com/uk-news/2018/dec/26/foxhunting-ban-being-ignored-say-environmental-groups>

Guardian

**Labour pledges to tighten up hunting laws as convictions fall**

21 November 2018

<https://www.theguardian.com/uk-news/2018/nov/02/labour-hunting-laws-pledge-convictions-fall-legal-loopholes>

Farmers Guardian

**Government urged to take action on 'growing' problem of illegal hare coursing**

9 November 2018

<https://www.fginsight.com/news/news/government-urged-to-take-action-on-growing-problem-of-illegal-hare-coursing-74220>

Telegraph

**Black market betting fuels 'terrifying' surge in illegal hare coursing**

24 March 2018

<https://www.telegraph.co.uk/news/2018/03/24/black-market-betting-fuels-terrifying-surge-illegal-hare-coursing/>

## 4. Press releases

### **Wildlife and Countryside Link**

#### **Update from the Wildlife Crime Working Group**

**28 February 2019**

The Wildlife Crime Working Group works to improve the conservation and protection of wild flora and fauna threatened by domestic wildlife crime and international trade, also seeking to address the associated welfare issues. The working group aims to ensure the effective enforcement of UK wildlife laws and the proper implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and relevant EU directives.

*Chair: Pete Charleston, Bat Conservation Trust*

*Vice Chair: David Cowdrey, International Fund for Animal Welfare*

*Policy and Campaigns Manager: Zoe Davies, Link*

#### *Domestic Wildlife Crime*

In 2018, the National Police Chiefs Council (NPCC) launched England and Wales's first [Wildlife Crime Policing Strategy](#), running from 2018-2021. It was launched alongside a Rural Affairs Strategy at the NPCC Rural Affairs Summit, which a number of Group members attended. Produced in close consultation with many members of this group, the Wildlife Crime Policing Strategy contains much to be welcomed, including echoing our calls for improved recording of wildlife crime.

Shortly before the launch of this strategy, members met with Home Office Minister, Victoria Atkins, to advocate for better central recording of wildlife crime. The Minister noted that any changes to the way in which wildlife crime is recorded must have the full support of the police. Publication of this strategy demonstrates that there is clear consensus between the police and the NGO sector, therefore strengthening the case for Home Office to make the urgent improvements needed to protect our wildlife from criminals. The Group is now supporting the National Wildlife Crime Unit (NWCU) in their pitch to the National Crime Registrar for improved recording of wildlife crime.

To strengthen our calls for improvements to wildlife crime recording further, in November Wildlife and Countryside Link and Wales Environment Link published their second [Annual Wildlife Crime Report](#) – this time looking at crime in 2017.

Data on wildlife crime in England and Wales collected by members show an increase of 24% in reported terrestrial wildlife crime incidents, with a 9% rise overall. Shockingly, only nine individuals and businesses were prosecuted last year for the wildlife crimes on which Link members collect data. This is down two-thirds on the 22 people convicted in 2016. Mark Jones, Chair of Link's Wildlife Crime Working Group, will launch the report at the National Wildlife Crime Enforcers' Conference in December. The story was covered in the [Telegraph](#) and is the subject

of a Link [blog](#) by the Group's Vice-Chair Pete Charleston. You can read Link's press release [here](#).

While the figures themselves tell a grim story, the reason Link produces an Annual Wildlife Crime Report is to advocate to Government that it must centrally record wildlife crime and produce its own annual report – as is done by the Scottish Government. At present, data on wildlife crime, such as that collected by Link members, are piecemeal and difficult to collate. Recording wildlife crime centrally would allow Government and police forces across England and Wales to track trends and allocate resources much more efficiently.

#### *International work*

Many Group members played a prominent part in the landmark London International Wildlife Trade Conference in October 2018. The conference, organised jointly by the Home Office, Foreign Office and Defra, brought together 1,500 delegates from over 80 countries including numerous Heads of State and Ministers.

Heads of State signed a [Declaration](#) promising to increase action to tackle the illicit financial flows associated with wildlife trafficking and related corruption, and welcomed action to treat wildlife offences as predicate offences, including for money laundering crimes. However, the lack of tangible, clear, time-bound, measurable commitments in the Declaration leaves a feeling of an opportunity missed, and will make it hard to hold governments to account in spite of their fine words.

## **Country Land and Business Association**

### **Crime minister takes stamping out hare coursing seriously**

**17 October 2018**

Crime Minister Victoria Atkins and cross-party MPs showed their support for the CLA's campaign to stamp out hare coursing at an event in Westminster yesterday (16 October).

The Home Office Minister heard first-hand from CLA members about the impact hare coursing has on rural businesses and communities.

Hare coursing is where dogs are used to chase, catch and kill hares with betting on the outcome. It was outlawed by the 2004 Hunting Act but takes place illegally without the permission of the landowner.

The CLA, whose members own or manage more than 10 million acres of rural land across England and Wales, highlighted the seriousness of this rural crime to MPs, calling for sentencing guidelines specifically related to the crime.

CLA President Tim Breitmeyer said:

Hare coursing is illegal and an abhorrent crime that causes damage to land and property and those who seek to intervene are often threatened, intimidated or attacked.

Hare coursers are hardened criminals who make large sums of money as a result of black market gambling and tough action is needed to stop them.

Introducing specific sentences for hare coursing and helping police reclaim kennelling costs for dogs seized from offenders would help to deter the crime and make rural communities feel safer.

Among those MPs lending their support to stamp out hare coursing were Shadow Farming and Rural Affairs Minister David Drew and Graham Stuart, MP for Beverley and Holderness, who hosted the event. He said: "Raising awareness of and supporting this campaign is extremely important as it affects so many people and communities across the UK and is not exclusive to any particular region or area, we must all work towards ultimately eradicating this criminal act from our society.

For too long have our rural communities and farmers been terrorised by groups of people doing this vulgar so-called 'sport'. It is right that we make more policymakers aware of the crime and advise them on what they can do to help support the campaign.

It is my hope that along with the CLA, other MPs and support from people across the UK we can work together to put an end to hare coursing.

Jonathan Davis, a gamekeeper in Nottinghamshire, said:

Gamekeepers are very much on the frontline. Organised gangs of criminals are using high powered 4x4 vehicles, dogs specifically bred to kill and often carry firearms. Tens of thousands of pounds can change hands in a single night. We need more support and better legislation to deter hare coursing and associated wildlife crimes such as poaching.

Click [here](#) to read the CLA's action plan to stamp out hare coursing in full.

Click here to view [#haltharecoursing](#) social media activity

## Natural England

### Joining Forces to Tackle Hare Coursing

**11 September 2018**

A group of agencies chaired by Natural England has joined forces to tackle the seasonal issue of illegal hare coursing.

With the harvest now complete, Suffolk, Norfolk, Cambridgeshire, Bedfordshire, Hertfordshire and Essex police forces are working in partnership with the National Farmers' Union (NFU), Natural England and the Country Land and Business Association to tackle this criminal activity which can cause thousands of pounds worth of damage to crop fields, irrigation systems, fences and gates.

Hare coursing has been illegal for more than a decade, since the implementation of the Hunting Act 2004. This banned activity sees greyhounds and other 'sight' hounds, such as lurchers, chasing a hare by sight, not scent.

Usually, but not always, it's carried out in groups. The dogs flush out the hares in the fields and are then released from their leads to chase, and often kill, the hare. Frequently the practice is highly organised. Significant sums of money can change hands in the form of illegal betting and gambling on the outcome. The victor is determined by the first dog to catch and 'turn' the hare or kill it.

Rural Sergeant for Hertfordshire Jamie Bartlett said:

Those engaged in this illegal act trespass on private land, damaging crops and property, as well as intimidating and showing violence towards those who challenge their presence. It can also be very distressing for members of the public to witness hare coursing.

We also believe that many of those engaged in hare coursing also commit other offences against the rural community, such as theft of farm machinery, diesel, tools and off road vehicles.

Operation Galileo is targeting Hare Coursing throughout the East of England. As part of this operation there are special days of action where Wildlife Crime Officers will be carrying out patrols along with other officers who will receive special local briefings and pay attention to hotspot areas within their districts, dealing robustly with offenders.

Paul Cantwell, Species Enforcement Specialist from Natural England who chairs the group said:

This is the first year that all six Forces in the East of England are all co-operating together in relation to Hare Coursing Operations over the course of a 'season'. This will help ensure that the East of England will not tolerate people coursing anywhere in the Region. But not only that, we are hoping all other areas of England and Wales will carry out their own operations on these dates to make the countryside a "no go" area for these criminals.

If you think you are witnessing hare coursing in progress call 999 immediately. [Other information should be reported via the non-emergency number 101, or online at \[www.herts.police.uk/report\]\(http://www.herts.police.uk/report\)](#) (or via other Forces online reporting tools).

Alternatively, [you can contact the independent crime-fighting charity Crimestoppers anonymously on 0800 555 111 or through their \[Anonymous Online Form\]\(#\)](#). No personal details are taken, information cannot be traced or recorded and you will never need to go to court.

## Department for Environment, Food & Rural Affairs

### Animal cruelty maximum sentences will be increased government confirms

*Tougher sentences for animal cruelty move step closer following results of consultation*

**7 August 2018**

Animal abusers who commit the most heinous crimes will face up to five years in jail after draft legislation set out by Environment Secretary Michael Gove gained strong support from welfare groups and the public.

Currently the maximum sentence is six months but following a consultation the Government has today confirmed it will legislate to increase that tenfold for serious offences, sending a clear sign there is no place for animal cruelty in England.

The draft Animal Welfare (Sentencing and Recognition of Sentience) Bill was put out to consultation in December 2017.

The consultation also set out proposals to ensure animal sentience is reflected in domestic law when we leave the EU. [A summary of responses](#) has been published today and work on this will continue.

But in line with the recommendation from the EFRA Committee, [earlier this year](#), legislation on sentencing will be brought forward separately so courts have the powers available to them.

Animal Welfare Minister, Lord Gardiner said:

This Government is making good on our commitment to make the UK a world leader in the care and protection of animals as we leave the EU.

Our proposals to raise maximum sentences for animal abusers attracted strong support. We will now legislate so courts have the power to punish offenders properly.

We will also continue to work with welfare organisations to ensure that animal sentience is properly recognised in our legislation once we have left the EU.

The Government also supported the Animal Welfare (Service Animals) Bill, introduced to Parliament by Sir Oliver Heald MP. The Bill, which passed its second reading in July, will ensure service animals such as police dogs and horses will be offered greater protection. The proposed legislation will remove a section of the current law of self-defence, often used by those who harm a service animal in the process of committing a crime.

The plans to increase maximum sentences follow a number of shocking cases where courts have said they would have handed down longer sentences had they been available.

These include a case last year when a man trained dogs to ruthlessly torture other animals, including trapping a fox and a terrier dog in a cage to brutally attack each other.

The move has been strongly welcomed by animal welfare groups and follows dedicated campaigning from Battersea Dogs & Cats Home.

Battersea's Chief Executive Claire Horton said:

Battersea welcomes the results of today's consultation as they confirm the nation is no longer prepared to put up with a six month sentence for shocking cases of cruelty to animals.

We believe a five year maximum sentence is far more appropriate and to the credit of the Government they have listened. We look forward to seeing the Bill laid before Parliament this year.

These plans are part of wider programme of reform to cement the UK's position as a global leader on animal welfare. This includes making CCTV mandatory in all English slaughterhouses and taking steps to control the export of live farm animals for slaughter as we leave the EU.

## **Department for Environment, Food & Rural Affairs, Natural England, Welsh Government, The Scottish Government**

### **New raptor persecution maps to help tackle wildlife crime**

*New technology will help crack down on crimes against raptors in England and Wales.*

**Last updated 15 February 2018** — [see all updates](#)

[Raptor persecution maps for England and Wales](#) have been published to enable the police to clearly see where the highest incidents are taking place and focus enforcement efforts in the areas that need it most.

The maps present the number of shootings, trappings, poisonings and nest destructions that took place across England & Wales between 2011 and 2015 and will be updated annually, providing an invaluable intelligence tool to help fight crimes against birds of prey.

North Yorkshire will be a priority area as the most incidents occurred there (39), followed by Norfolk (17), Cumbria (11), Derbyshire (11), Lincolnshire (10), Suffolk (8) and Northumberland (8).

Wildlife Minister Thérèse Coffey said:

Birds of prey are a vital part of our animal landscape, icons of our cultural heritage and key to boosting local economies by attracting visitors to England and Wales.

These maps highlight hotspots across the country for crimes against these precious birds, enabling the police to crack down with increased enforcement in areas where it's needed most – building on the valuable work land management, conservation and shooting organisations are already doing to help protect iconic birds of prey.

There are already strong penalties in place for committing offences against birds of prey and the unlawful use of traps and all wild birds are protected under the Wildlife and Countryside Act 1981.

The Government takes all wildlife crime very seriously and raptor persecution has been identified as a UK wildlife crime priority. Each priority has a delivery group to consider what action should be taken, develop a plan to prevent crime, gather intelligence on offences and enforce against it.

The [National Wildlife Crime Unit](#) also monitors and gathers intelligence on illegal activities affecting raptors and provides assistance to police forces when required.

These maps build on this valuable work and will help boost the fight against those who continue to commit crimes against raptors. In the five year measurable period there have been 262 incidents in England and Wales: 146 of these caused by shooting and 66 by poisoning.

The majority of incidents took place against buzzards (108), followed by owls (40), red kites (39) and peregrine hawks (34).

In January 2016 the government published the [Hen Harrier Action Plan](#) and the new maps will help support the six positive actions outlined in the plan, which are already underway. Today's maps show one incident involving Hen harriers.

The maps were developed by the [Raptor Persecution Priority Delivery Group](#), which includes Defra, the Devolved Administrations, [Natural England](#), National Wildlife Crime Unit, the police, [British Association for Shooting and Conservation](#), [RSPB](#), [Country Land and Business Association](#), [Moorland Association](#), [National Game Keepers' Organisation](#), [National Parks England](#), [Crown Prosecution Service](#) and [the Countryside Alliance](#).

## 5. Parliamentary Questions

### [Birds of Prey: Theft](#)

**Asked by: Shannon, Jim**

To ask the Secretary of State for Environment, Food and Rural Affairs, what steps his Department is taking to prevent birds of prey being stolen to order.

**Answering member: Dr Thérèse Coffey | Department: Department for Environment, Food and Rural Affairs**

The Government takes wildlife crime, including the illegal taking of birds of prey, seriously. All wild birds are protected under the Wildlife and Countryside Act 1981, with strong penalties for those committing offences against birds of prey including up to six months in prison and/or an unlimited fine.

Birds of prey are listed on the Convention on International Trade in Endangered Species (CITES), which controls trade in endangered species through a permitting system. This protects species from the risk of extinction due to unsustainable trade. The Control of Trade in Endangered Species Regulations 2018 means that anyone committing CITES offences, including trying to trade in birds of prey taken from the wild, could face up to five years' imprisonment and/or an unlimited fine.

Raptor persecution and CITES issues are two of six UK wildlife crime priorities. Local police and Border Force are responsible for wildlife crime enforcement. The National Wildlife Crime Unit, which is co-funded by Defra and the Home Office, provides intelligence to support police and Border Force enforcement activities.

**HC Deb 15 February 2019 | PQ 219440**

### [Animals: Crime](#)

**Asked by: Rashid, Faisal**

To ask the Secretary of State for the Home Department, what plans the Government has to increase police resources to deal with crimes against animals and wildlife, including investigating reports of illegal fox hunting.

**Answering member: Mr Nick Hurd | Department: Home Office**

The Home Office, along with the Department for Environment, Food and Rural Affairs, committed to fund the National Wildlife Crime Unit until 2019/20. This money is in addition to central government funding to police forces. Decisions on funding the National Wildlife Crime Unit beyond 2020 will be taken at the next Spending Review.

The Government does not prescribe the nature or level of resources deployed by individual police forces to tackle crimes against animals and

wildlife or any other form of crime. It is for Chief Constables and Police and Crime Commissioners, as operational leaders and elected local representatives, to ensure that forces' priorities locally reflect those of their communities, and it is important that forces have the flexibility to deploy their resources without Government interference.

**HC Deb 07 February 2019 | PQ 215258**

[Hunting Act: Prosecution Rates](#)

**Asked by: Justin Madders**

What assessment he has made of the effectiveness of the CPS in prosecuting offences under the Hunting Act 2004.

**Answering member: The Solicitor General (Robert Buckland) | Department: Attorney General**

Each CPS area has a Crown prosecutor dedicated to act as a wildlife, rural and heritage crime co-ordinator, to ensure that the specialist knowledge needed to prosecute such offending is readily available. Co-ordinators work closely with specialist officers from local police forces and from the National Wildlife Crime Unit, to ensure a robust CPS response.

**HC Deb 31 January 2019 | Vol 653 c955**

[Birds of Prey: Conservation](#)

**Asked by: Lord Birt**

To ask Her Majesty's Government what plans they have to counter the unlawful killing of hen harriers.

**Answering member: Lord Gardiner of Kimble | Department: Department for Environment, Food and Rural Affairs**

The Government is very concerned about hen harrier populations, which is why we took the lead on the Hen Harrier Action Plan. This sets out what will be done to increase hen harrier populations in England and includes measures to stop illegal persecution. A copy of the plan is available on GOV.UK.

All wild birds are protected under the Wildlife and Countryside Act 1981, with strong penalties for committing offences against birds of prey and other wildlife. The Government takes wildlife crime very seriously and has identified raptor persecution as a national wildlife crime priority, focusing on hen harrier, golden eagle, goshawk, peregrine, red kite and white tailed eagle.

**HL Deb 16 January 2019 | PQ HL12536**

[Hare Coursing](#)

**Asked by: Baroness Jones of Whitchurch**

To ask Her Majesty's Government what resources are in place to implement the ban on hare coursing.

**Answering member: Lord Gardiner of Kimble | Department: Department for Environment, Food and Rural Affairs**

Local police forces are taking steps to address hare coursing and associated crimes. The role of locally elected Police and Crime Commissioners is to hold their forces to account, including on how they tackle the crimes that matter most to residents and businesses. The National Wildlife Crime Unit includes hare coursing as one of its priorities. In addition, the six police forces across the East of England have come together and are deploying Operation Galileo to tackle hare coursing.

**HL Deb 11 December 2018 | PQ HL11854**

[Birds of Prey: Conservation](#)

**Asked by: McCarthy, Kerry**

To ask the Secretary of State for Environment, Food and Rural Affairs, if he will bring forward legislative proposals on vicarious liability for crimes against birds of prey.

**Answering member: Dr Thérèse Coffey | Department: Department for Environment, Food and Rural Affairs**

All wild birds are protected under the Wildlife and Countryside Act 1981, which provides a powerful framework for the conservation of wild birds, their eggs, nests and habitats.

There are no plans to introduce vicarious liability in England for offences related to wildlife crime.

**HC Deb 12 November 2018 | PQ 188753**

[Hare Coursing](#)

**Asked by: Baroness Kennedy of Cradley**

To ask Her Majesty's Government what assessment they have made of problems caused by illegal hare coursing.

**Answering member: Lord Gardiner of Kimble | Department: Department for Environment, Food and Rural Affairs**

The Government is aware of the issue of illegal hare coursing and the considerable concern it can cause to rural communities. We recognise that local police forces are taking steps to address hare coursing and associated crimes and that this is an operational matter for the police. The role of locally elected Police and Crime Commissioners is to hold their forces to account, including on how they tackle the crimes that

matter most to residents and businesses. The National Wildlife Crime Unit includes hare coursing as one of its priorities. In addition, the six police forces across the East of England have come together and are deploying Operation Galileo to tackle hare coursing.

**HL Deb 08 November 2018 | PQ HL11031**

### [Badgers](#)

**Asked by: The Marquess of Lothian**

To ask Her Majesty's Government what action they are taking to ensure the crime of badger baiting is ended.

**Answering member: Lord Gardiner of Kimble | Department: Department for Environment, Food and Rural Affairs**

Badgers and their setts are protected under the Protection of Badgers Act 1992, which makes it illegal to kill, injure or take badgers or to interfere with a badger sett. Interference with a sett includes blocking tunnels or damaging the sett in any way.

Badger persecution (including badger baiting) is one of the UK's six wildlife crime priorities. Each UK wildlife crime priority has a delivery group responsible for taking forward actions to gather and share intelligence to inform enforcement activities.

**HL Deb 11 June 2018 | PQ HL8223**

### [Tortoises: Sales](#)

**Asked by: Hendrick, Sir Mark**

To ask the Secretary of State for Environment, Food and Rural Affairs, on how many occasions in the last three calendar years the Department for Environment, Food and Rural Affairs was notified of the sale of tortoises without correctly completed Article 10 transaction certificates; and how many of those reports (a) were investigated and (b) resulted in (i) prosecution and (ii) another legal remedy.

**Answering member: George Eustice | Department: Department for Environment, Food and Rural Affairs**

The information requested is set out in the table below.

Year	Sale of tortoises without correctly completed Article 10 transaction certificates
2015	13
2016	21
2017	23

The Animal and Plant Health Agency (APHA) refer all investigations to the National Wildlife Crime Unit or the local Police Force to take forward. APHA are not provided with updates on cases and therefore

do not hold records of how many were investigated, prosecuted or had other legal remedies.

**HC Deb 22 March 2018 | PQ 133098**

[Wildlife: Crime](#)

**Asked by: Lynch, Holly**

To ask the Secretary of State for the Home Department, pursuant to the Answer of 20 February 2018 to Question 127241, what information her Department holds on the number of fully trained wildlife crime officers in each year since 2010.

**Answering member: Mr Nick Hurd | Department: Home Office**

The Home Office does not hold centrally any information on the number of trained wildlife crime officers.

It is for elected Police and Crime Commissioners and Chief Constables to decide how their force's resources are deployed.

**HC Deb 27 February 2018 | PQ 129150**

[Wildlife: Crime](#)

**Asked by: Lynch, Holly**

To ask the Secretary of State for the Home Department, whether police officers appointed as wildlife crime officers hold a range of other responsibilities.

**Answering member: Mr Nick Hurd | Department: Home Office**

The Government does not prescribe the nature or level of resources deployed by police forces to tackle wildlife crime. Whether wildlife crime officers focus solely on tackling wildlife crime, or hold a range of other responsibilities, are operational matters for police forces. It is for Police and Crime Commissioners to ensure that forces' priorities reflect those of their communities, and individual forces must have the flexibility to deploy their resources without Government interference.

**HC Deb 20 February 2018 | PQ 127536**

[Wildlife: Crime](#)

**Asked by: Lynch, Holly**

To ask the Secretary of State for the Home Department, what comparative estimate she has made of the number of fully trained wildlife crime officers in 2010 and 2018.

**Answering member: Mr Nick Hurd | Department: Home Office**

It is for elected Police and Crime Commissioners and Chief Constables to decide how their force's resources are deployed and how best to manage their communications with the public.

**HC Deb 20 February 2018 | PQ 127241**

[Birds of Prey: Conservation](#)

**Asked by: Benn, Hilary**

To ask the Secretary of State for Environment, Food and Rural Affairs, what his policy is on preventing the persecution of raptors.

**Answering member: Dr Thérèse Coffey | Department: Department for Environment, Food and Rural Affairs**

All wild birds are protected under the Wildlife and Countryside Act 1981, which provides a powerful framework for the conservation of wild birds, their eggs, nests and habitats. The Government is committed to ensuring the protection afforded to wild birds of prey is effectively enforced. There are strong penalties for offenders, including imprisonment.

Raptor persecution is one of six national wildlife crime priorities. Each wildlife crime priority has a delivery group to consider what action should be taken and develop a plan to prevent crime, gather intelligence on offences and enforce against them. The Raptor Persecution Priority Delivery Group (RPPDG) focuses on the golden eagle, goshawk, hen harrier, peregrine, red kite and white tailed eagle.

The RPPDG has recently produced raptor persecution maps, which show the distribution of confirmed incidents of raptor persecution including shootings, trappings, poisonings and nest destruction across England and Wales over a five year period (2011-2015). The maps will be a significant intelligence tool to tackle wildlife crime; they will help the police gain a better understanding of where the problem areas are, and target these crime hotspots with increased levels of enforcement. The maps can be viewed at: <http://www.magic.gov.uk/>

The National Wildlife Crime Unit, which is part funded by Defra, monitors and gathers intelligence on illegal activities affecting birds of prey and provides assistance to police forces when required.

**HC Deb 11 January 2018 | PQ 121418**

## 6. Useful links

Countryside Alliance

<https://www.countryside-alliance.org/>

RSPCA *Fox hunting - Keep the Ban*

<https://www.rspca.org.uk/getinvolved/campaign/hunting>

RSPCA *Social media cockfighting and hare coursing*

[https://www.rspca.org.uk/whatwedo/endcruelty/prosecution/crueltystories/details/-/articleName/PAR\\_2017\\_cockfighting\\_social\\_media](https://www.rspca.org.uk/whatwedo/endcruelty/prosecution/crueltystories/details/-/articleName/PAR_2017_cockfighting_social_media)

Gov.UK *Hunting and shooting wildlife – Mammals*

<https://www.gov.uk/hunting/mammals>

League Against Cruel Sports *Fox hunting*

<https://www.league.org.uk/fox-hunting>

*Hare hunting and coursing*

<https://www.league.org.uk/hare-hunting-and-hare-coursing>

National Trust *Our position on trail hunting*

<https://www.nationaltrust.org.uk/features/our-position-on-trail-hunting>

Country Land and Business Association *Hare coursing action plan*

<https://www.cla.org.uk/sites/default/files/CLA%20Hare%20Coursing%20Plan%20WEB.pdf>

World Animal Protection *Wildlife crime in the UK*

<https://www.worldanimalprotection.org.uk/campaigns/animals-wild/wildlife-crime-in-uk>

Gov.UK *Partnership for Action Against Wildlife Crime*

PAW is a collaboration of organisations who work together to reduce wildlife crime. They do this through prevention and awareness-raising, better regulation, and effective and targeted enforcement.

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

The Wildlife Trusts *Wildlife Crime*

<https://www.wildlifetrusts.org/wildlife-crime>

UK National Wildlife Crime Unit *Current UK priorities*

<https://www.nwcu.police.uk/how-do-we-prioritise/priorities/>

Crown Prosecution Service *Wildlife Offences Legal Guidance*

<https://www.cps.gov.uk/legal-guidance/wildlife-offences>

National Police Chiefs' Council *Wildlife Crime Policing Strategy 2018 - 2021 Safeguarding our wildlife*

<https://www.npcc.police.uk/documents/crime/2018/NPCC%20Wildlife%20Crime%20Policing%20Strategy%202018%20%202021.pdf>

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