



The Moorland Association

Deputy Chief Constable Nigel Harrison
North Wales Police HQ
Glan Y Don
Abergele Road
Colwyn Bay
LL29 8AW

7 September 2026

Dear DCC Harrison,

Re: National Wildlife Crime Unit – outstanding concerns and correction of the record

Thank you for the letter sent on your behalf by Sergeant West on 3 September in response to the Moorland Association's letter of 14 August.

We welcome the useful confirmations that the particular report about which we had been concerned has not been submitted to Defra; that the NWCU provides quarterly stakeholder updates to Defra; and that you retain oversight of the Unit.

I had intended simply to respond to the remaining points and suggest that the outstanding matters now be dealt with through the follow-up meeting agreed last September. However, today the Moorland Association received from the NPCC Freedom of Information team the proposed response and correspondence scheduled for public release on 10 September under FOI reference 3065/2026.

That disclosure is helpful because the contemporaneous correspondence appears to require correction of some important statements in the letter sent on your behalf on 3 September.

The December 2025 correspondence

The 3 September letter states that, following our meeting on 4 September 2025:

“One action being the 4P plan be forwarded to yourself and a request you acknowledge the terms of reference of the working group and show what area of the 4P plan you can support. Whilst this has been sent, no response has been received from yourself around this despite follow up emails.”

It goes on to state that Inspector Dunn wrote to me in December “requesting your availability to facilitate this meeting” and that this “was not responded to until a follow up email in May 2026”.

The NPCC's own proposed disclosure now contains the relevant correspondence.

Inspector Dunn wrote to me on 2 December 2025. I replied the following evening, 3 December 2025. In that response I expressly acknowledged receipt of the TDG terms of reference and 4P plan and stated:

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"I am grateful for you sending through the TDG terms of reference and the 4P plan for Bird of Prey Crime, which I will share with the Moorland Association board for consideration."

I then set out our understanding that the September meeting had established a route for rebuilding dialogue, involving both sides working through the outstanding matters, correcting any inaccuracies and identifying where disagreement remained. I expressly agreed that a meeting between myself and CI Lacks-Kelly would be helpful and stated that I remained open to such a meeting.

It is therefore not correct to say that no response was received, or that I did not respond until May 2026.

There is a second distinction which I think is important to clarify.

Inspector Dunn's email of 2 December did not simply request my availability for a meeting. It stated that, for the NWCU to work with the Moorland Association, it would **seek** acknowledgement of the TDG terms of reference and agreement to the NGO accountabilities in the 4P plan. It also stated that, before the proposed meeting could take place, CI Lacks-Kelly required the MA blog to be removed and for it to be recognised as "fundamentally incorrect".

My response explained why we considered any disputed statements in the blog should instead be considered as part of the agreed process of working through the facts on both sides.

Those are materially different circumstances from the chronology presented in the 3 September letter.

The 4P plan

For the avoidance of any further misunderstanding, the Moorland Association did not understand that it had agreed, as an action arising from the September 2025 meeting, either to acknowledge the TDG terms of reference or to identify which elements of the 4P plan it would support.

Our understanding was that the documents would be supplied for consideration in the context of possible future re-engagement with the Delivery Group. That is entirely consistent with my contemporaneous response of 3 December, in which I said that I would share them with the MA Board "for consideration".

The distinction matters. Being supplied with a document for consideration is not the same thing as agreeing to it.

If the police maintain that the MA expressly agreed at the meeting, as an action arising from it, to acknowledge the TDG terms of reference and identify which elements of the 4P plan it would support, could you please provide the contemporaneous agreed minute, action note or other record upon which that assertion is based?

Otherwise, I would be grateful if the record could now be corrected.

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The agreed follow-up meeting

The contemporaneous correspondence also shows substantial common ground about the purpose of the agreed follow-up meeting.

In June, Sergeant West himself described his understanding of the September meeting as being that an MA representative would meet CI Lacks-Kelly and:

“try and look at the issues raised on both sides against the aims and objectives of the PDG and the rural and wildlife crime strategy.”

That is substantially the same understanding that we have repeatedly expressed.

The Moorland Association sought to progress that meeting again in May, June and subsequently in August. Our objective has consistently been to sit down with the NWCU, establish the facts, correct any inaccuracies on either side and clearly record those matters on which genuine disagreement remains.

Against that documentary background, I do not think it is fair to characterise the MA as having failed to engage or to suggest that the absence of progress resulted from us failing to respond to the December correspondence.

The substantive concerns remain outstanding

I also do not think the 3 September letter resolves the substantive concerns raised by the Association.

The letter says that several concerns were “aired and discussed” at the September meeting and that the police consider them to have been addressed. Discussion, however, is not the same as resolution. The eight numbered concerns set out in our August 2025 letter have still not received a consolidated substantive response, nor have most of the specific governance and methodological questions set out at paragraph 5(a)–(l) of our letter of 14 August 2026.

If the police consider particular questions to have been answered already, it should be straightforward to identify each question and the response previously provided. We would be very happy to remove genuinely answered matters from the outstanding schedule. That would seem preferable to continuing an exchange about whether questions have or have not been answered.

Equally, I do not accept that the fact that the MA is currently outside the TDG prevents these concerns being addressed. We are not seeking operational intelligence, details of live investigations or material protected by information-sharing agreements. The questions concern matters such as the high-level definition and use of “hotspots”, the distinction between confirmed crime, suspected crime, intelligence and unexplained tag loss, the validation of material supplied externally, proportionality in communications with estates and the governance arrangements surrounding those activities.

Those are precisely the issues upon which clarity is required if confidence is to be rebuilt.

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**Information supplied to Defra**

We welcome your confirmation that the particular hotspot report about which we had expressed concern has not yet been submitted to Defra.

The 3 September letter nevertheless confirms both that the NWCU supplies Defra with quarterly information and that the work of the satellite-tagged bird of prey taskforce could form part of a police response should Defra consult on gamebird shooting.

That makes the safeguards requested in our 14 August letter particularly important.

We are not asking the police to withhold legitimate information from government. We are simply asking for assurance that, before potentially adverse conclusions derived from the hotspot exercise are used to inform policy, regulatory decisions or public communications, they will be appropriately validated and qualified; that confirmed criminality will be distinguished clearly from suspicion, intelligence, unexplained incidents and statistical association; and that relevant contrary or qualifying evidence will not be omitted.

I would be grateful for confirmation that those basic safeguards will apply.

FOI 3065/2026

There is also an obvious error in the proposed disclosure which I assume can readily be corrected before publication. The schedule dates my response to Inspector Dunn as 3 December 2026. It was, of course, sent on 3 December 2025, the day after his email of 2 December 2025.

More generally, now that the NPCC itself proposes publicly to disclose the correspondence, it seems particularly important that the accompanying chronology is accurate and does not inadvertently create a misleading impression through omission or incorrect dating.

I will raise that administrative correction separately with the FOI team before its 9 September deadline.

Publication of the correspondence

We have deliberately refrained from publishing this correspondence while seeking to resolve these matters privately. However, now that the NPCC proposes to place selected extracts from that correspondence into the public domain under FOI 3065/2026, we consider it important that the record can be read in its proper context.

The Association therefore intends to publish the substantive correspondence exchanged between the Association and the police concerning these matters, including correspondence from both sides, subject to appropriate redaction of personal data, operationally sensitive information and third-party material where necessary.

This is not intended to pre-empt the continuing discussions or to criticise the FOI process. It is simply intended to ensure that, once selected parts of the correspondence are being placed in the public domain, our members and others are able to consider the substantive exchanges in their proper context.

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A constructive way forward

Notwithstanding that publication, our preference remains to resolve these matters directly rather than through an increasingly lengthy exchange of correspondence.

There appears to be a relatively straightforward way forward: the meeting agreed in September 2025 should now take place, under appropriate senior oversight, with a short schedule of the remaining issues supplied in advance.

The purpose should be to identify:

1. Matters which can be agreed and closed.
2. Any factual inaccuracies on either side which should be corrected.
3. Matters where further information can reasonably be provided.
4. Genuine areas of disagreement which should simply be recorded as such.

The Moorland Association remains entirely willing to correct anything it has said which can be demonstrated to be factually wrong. We ask for the same approach from the police.

Given the history of the matter, I would be grateful if this response could now be considered by you personally and if your office could provide proposed dates for the meeting within five working days.

I am copying this response to the same Chief Constables who received our letter of 14 August, for continuity and because the matters raised potentially concern information arising from their respective force areas. I am not seeking separate responses from them at this stage.

If the police no longer consider the agreed meeting an appropriate means of resolving these matters, please confirm that clearly and identify the appropriate formal complaint and independent review route. After almost two years of attempting to resolve the issues informally, it is important that all parties now know where matters stand.

Yours sincerely,

Andrew Gilruth
Chief Executive
Moorland Association

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Copied to:

Chief Inspector Kevin Lacks-Kelly, Head of UK Wildlife Crime
Sergeant Craig West, Staff Officer to DCC Harrison

Chief Constable Vanessa Jardine, Northumbria Police
Chief Constable Rachel Bacon, Durham Constabulary
Chief Constable Tim Forber, North Yorkshire Police
Chief Constable Sir John Robins QPM DL, West Yorkshire Police
Chief Constable Lauren Poultney, South Yorkshire Police
Chief Constable Darren Martland, Cumbria Constabulary
Chief Constable Sacha Hatchett, Lancashire Constabulary
Acting Chief Constable Simon Blatchly OBE, Derbyshire Constabulary

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