



The Moorland Association

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

14 August 2026

Dear DCC Harrison

Urgent: Unresolved concerns regarding the National Wildlife Crime Unit and proposed report to Defra

I write on behalf of the Board of the Moorland Association further to the Association's letter of 21 August 2025 and the subsequent discussions and correspondence concerning the conduct and approach of the National Wildlife Crime Unit (NWCU).

Our overriding objective remains to resolve these matters constructively. However, the agreed follow-up meeting with the NWCU, which your office undertook to arrange, has not taken place despite our repeated requests¹. We have also received no consolidated substantive response addressing the eight concerns set out in our August 2025 letter. We have now been informed, on a basis we consider reliable, that the NWCU intends to provide Defra with a report concerning areas it describes as "hotspots". This materially increases the urgency of resolving the outstanding issues.

The promised meeting

Our letter of 21 August 2025 consolidated the concerns first raised with your office in September 2024. It identified eight principal areas of concern:

1. the exaggeration or misrepresentation of suspected incidents as established crime.
2. the use of requests for ostensibly consensual surveillance in circumstances where the purpose, safeguards and consequences were not adequately explained.
3. the withholding of information about the policies, evidence and methodology used by the NWCU.
4. inflammatory or adversarial communications.
5. the apparently inconsistent treatment of different stakeholders.
6. the disproportionate attribution of responsibility to estates for events occurring many kilometres away.
7. the failure to acknowledge relevant alternative ecological and locational evidence.
8. the resulting effects on the mental health of gamekeepers, rural communities and confidence in the police.

¹ Following the meeting held on 4 September 2025, we have requested a meeting date on 11 November 2025, 12 May 2026, 12 June 2026, 18 June 2026.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



At our meeting with you on 4 September 2025, it was agreed that your office would arrange a follow-up meeting between the Moorland Association and the NWCUC. The purpose of that meeting was to work through the matters raised by both sides, correct inaccuracies where necessary and identify openly any remaining areas of disagreement.

We have made repeated efforts to arrange that meeting, including through Inspector Craig West and other officers. We have been patient while officers familiarised themselves with the background and sought instructions. Nevertheless, no date has been offered and no consolidated substantive response addressing the eight numbered concerns has been provided.

The absence of progress is particularly concerning because the approach which gave rise to our original concerns has continued and has subsequently been described publicly by the NWCUC.

The current NPCC Rural and Wildlife Crime Strategy 2025-2028 states that the Head of the NWCUC is directly accountable to the NPCC Police Chief Officer lead for this portfolio.² It also commits the portfolio to governance which provides value to the public, stakeholders and funders; to performance arrangements which allow oversight and scrutiny; and to “unbiased professionalism”, including an impartial and data-led approach in areas of polarity. As the NPCC Chief Officer lead, the senior accountability for addressing these concerns therefore rests with you. We are seeking the application of that oversight, rather than the matter simply being referred back to the NWCUC to resolve without independent senior involvement.

Continued approaches to an estate

A further example has arisen since our August 2025 letter. On 28 August 2025, the agent for one estate informed the NWCUC that the estate was not aware of any incidents of concern and invited the Unit to provide in writing any information it wished the estate to consider. The NWCUC subsequently provided an explanation of its concerns but continued to press for a meeting on 16 October and 10 November 2025.

In doing so, the NWCUC described the purpose of the proposed meeting as being to “*prevent any further crimes from occurring on the estate*”. This was despite acknowledging that there were no further lines of enquiry in the relevant investigations and despite the estate explaining that the previously investigated incident had resulted in no further action. The estate therefore reiterated on 11 November that it did not consider a meeting necessary but remained willing to consider any material evidence provided in writing.

We recognise that the police are entitled to request voluntary engagement and that the NWCUC stated that it was not attributing blame. Our concern is not with the initial request for a meeting. It is that the meeting continued to be pursued after a clear and reasoned response, using language capable of presenting suspected or unexplained incidents as crimes already established. This reinforces the need for clarity about the voluntary nature of such engagement and for careful distinction between intelligence, hypothesis, suspected incidents and proven offending.

² NPCC, Rural and Wildlife Crime Strategy 2025–2028, PDF pp. 19 and 22 (“Governance and Professionalism” and “Method of Delivery”).

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



Subsequent public statements by the NWCU

Since our August 2025 letter, Detective Inspector Mark Harrison of the NWCU has spoken publicly about the hotspot exercise during a webinar hosted by Friends of the Dales on 27 January 2026.

During that webinar, DI Harrison stated that the NWCU had identified eight hotspot estates and explained:

“We go in at that very high level to make sure that the owners, the people with responsibility, know what’s going on, and this enables us to apply pressure and to ask them to work with us and to make the crime stop.”

He also described the approach taken at these meetings as follows:

“This isn’t a passive request or a gentle request. People don’t like what we’re telling them, and we do get challenged a lot. It can be quite uncomfortable at the start of these meetings.”

These statements appear to support, rather than answer, the concern raised in our August 2025 letter: that suspicion and inference are being presented to estates as established crime, and that landowners and employees are being placed under pressure to “make the crime stop” despite the absence, in the cases brought to our attention, of charges, convictions or disclosed evidence demonstrating that a crime occurred on the relevant land.

DI Harrison also acknowledged the substantial risk of “*misinformation and biased opinion*” and “*rage baiting*” in this area. We agree. That risk makes it especially important that police communications distinguish clearly between proven offences, reported incidents, intelligence, suspicion, statistical association and hypothesis.

The public statements made since our August 2025 letter therefore make the promised meeting more important, not less.

We recognise that the absence of a charge or conviction does not necessarily mean that no relevant intelligence exists, and we are not seeking disclosure of operationally sensitive material. Our concern is with the use of categorical language which appears to present criminality as established when the available position may amount to intelligence, suspicion or hypothesis.

Proposed report to Defra

We have received credible information indicating that the NWCU intends to provide Defra with information or a report concerning its hotspot exercise. We understand that the timing and final content of any such report may not yet have been settled. Given its potential significance, we ask you to confirm the position and the safeguards that will apply.

This creates a number of immediate concerns.

- I. It appears that a national report may be provided to a government department before the estates concerned have been given any meaningful opportunity to understand or respond to the methodology, evidence or conclusions.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.

2. The present status, content and validation arrangements for the proposed report are unclear. It is therefore important to establish whether the relevant local police forces have been given an opportunity to check the factual information and conclusions attributed to their respective force areas.
3. Information submitted to Defra could influence policy, ministerial briefings, regulatory decisions and public communications. It may also become the subject of requests under information-access legislation. If individual estates or groups of estates are identified, or can readily be inferred, the reputational consequences could be considerable even where no offence has been proved.
4. There is a clear risk that the unresolved methodological and evidential concerns raised since 2024 could be carried into material supplied to Defra without first being examined or appropriately reflected in the report.

Nothing in this letter seeks to prevent lawful operational activity, the investigation of suspected offences or genuinely necessary intelligence-sharing between public authorities. Our concern is narrower: potentially adverse conclusions about named or readily identifiable estates should not be communicated for policy or wider governmental purposes without appropriate validation, qualification and safeguards against material factual error.

Action now requested

In light of this development, we ask you to exercise senior oversight and provide the following assurances and information.

1. Please confirm whether the proposed hotspot report, or any substantive part of it, has already been supplied to Defra or any other government department, agency or external organisation.
2. If information has already been supplied, please identify:
 - a. the date on which it was supplied.
 - b. the organisation and intended recipients.
 - c. the purpose for which it was supplied.
 - d. whether the material identified, or enabled the identification of, particular estates or individuals.
 - e. what qualifications, caveats or warnings accompanied it.
3. If the report has not yet been supplied, pending clarification, please confirm that no report identifying, or enabling the identification of, particular estates and attributing criminality or other adverse conclusions to them will be supplied to Defra without appropriate force-level validation, clear qualification of the evidence and conclusions, and an opportunity for the estates concerned to correct material factual inaccuracies.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

4. Consistent with the agreement reached at our earlier meeting, please now arrange, through your office, the promised follow-up meeting involving the appropriate NWCU officers and Moorland Association representatives. We ask that proposed dates be provided within five working days and that the meeting take place as soon as practicable.
5. To enable that meeting to be productive, and insofar as this can be done without disclosing operationally sensitive information, please provide a written explanation of:
 - a. the purpose and intended use of the hotspot exercise.
 - b. the definition of a “hotspot” and the evidential threshold applied.
 - c. whether the identified locations are described as crime hotspots, incident hotspots, intelligence hotspots or areas of statistical interest.
 - d. the datasets, geographical areas and time periods used.
 - e. the distinction made between confirmed crimes, reported incidents, suspicious tag losses, intelligence reports and other information.
 - f. the criteria used to select estates for visits.
 - g. the process by which local police forces supplied, checked or validated the information.
 - h. the extent to which information from non-police organisations was used and how its reliability was assessed.
 - i. the quality-assurance and senior sign-off process for the proposed Defra report.
 - j. the arrangements governing confidentiality, data protection and subsequent disclosure, including how assurances previously given by the NWCU that exact hotspot locations and landownership would not be publicly shared will apply to information supplied to Defra.
 - k. whether the report will include the contrary or qualifying evidence previously supplied by the Moorland Association.
 - l. the criteria and process for periodically reviewing, correcting or removing a hotspot designation, including how the absence of subsequent incidents, the outcome of local police investigations and any corrected or qualifying information are reflected in the designation and communicated to the estates concerned.
6. Please provide a substantive response to the eight areas of concern set out in our letter of 21 August 2025, together with the subsequent concerns arising from continued approaches to estates and the NWCU's public statements.
7. Please confirm how the senior accountability and oversight arrangements set out in the current NPCC strategy will be applied to these concerns, including whether they will be reviewed by an officer outside the NWCU's operational team, and confirm the appropriate formal complaint route if the matters cannot be resolved through the proposed meeting.

Because the timing of the proposed Defra report is unknown, we ask you to confirm within five working days whether any report or substantive information has already been supplied and, if it has not, whether the safeguards requested at point 3 will be applied. We ask that proposed meeting dates be provided within ten working days and that a substantive response to the remaining matters be provided within 20 working days.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

Relevant Chief Constables

The hotspot exercise concerns incidents and police activity across a number of force areas. The relevant forces may have supplied, validated or relied upon information which the NWCU now proposes to incorporate into a report for Defra. We are therefore copying this letter to the Chief Constables of those forces for information and appropriate governance oversight.

We are not asking each Chief Constable to conduct a separate investigation at this stage. However, we consider it important that they know that the methodology, evidential basis and presentation of the hotspot exercise remain subject to a longstanding and unresolved challenge, particularly if information attributed to their respective force areas is to be provided to government.

Conclusion

The Moorland Association and its members remain committed to tackling wildlife crime and working constructively with the police. We have provided information, engaged with local officers and repeatedly sought a meeting through the agreed channels.

What is no longer acceptable is for our concerns to remain unanswered while the disputed approach continues and potentially consequential conclusions are prepared for submission to Defra.

The Association has attempted to resolve these matters informally for almost two years. The Board has therefore concluded that this now requires urgent senior intervention. We hope that the meeting and assurances requested above will allow matters to be resolved constructively. In the absence of a timely and substantive response, however, the Board will have to consider a formal complaint and whether the governance and dissemination of the hotspot exercise should be raised with the relevant local policing bodies, the Home Office and Defra.

We look forward to hearing from you as a matter of urgency.

Yours sincerely,

Andrew Gilruth

Chief Executive
Moorland Association

Attachments:

1. Moorland Association letter to DCC Harrison dated 21 August 2025, including its annexes.
2. Relevant extracts from the Friends of the Dales webinar of 27 January 2026.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

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

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



Attachment I – Moorland Association letter to DCC Harrison dated 22 August 2025, including annexes.

For ease of reference and to avoid duplicating a substantial document, this attachment is not reproduced here. It is published separately as Document 2 in the correspondence accompanying this blog.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

Webinar 1 – ('Protecting Birds of Prey – Inside the Work of UK Wildlife Crime Policing', 27 January 2026) – key claims by DI Mark Harrison, with verbatim quotations from the webinar transcript.

Speaker: Detective Inspector Mark Harrison, UK National Wildlife Crime Unit

Source: Full transcript of "Eyes on the Skies" webinar, hosted by Friends of the Dales, January 2026.

The following verbatim quotations are drawn from the webinar transcript and are referenced in the body of this letter. Our concern in each case is not merely with the underlying view expressed, but with the absence of visible caveat, contextual balance, or editorial challenge in material presented as educational content.

A1. "Organised and deliberate" framing of bird of prey crime

DI Harrison described bird of prey crime using language associated with serious organised crime:

"these crimes I'm going to talk about now show intent, show that they're taking place. It's organized and it's deliberate, and a lot of it there's attempts to mislead the police, to destroy evidence and to do everything possible to avoid detection and being linked to a crime."

Concern: This language frames lawful rural communities in the same terms as serious organised crime networks, without the evidential basis to support such blanket characterisation. The Charity platformed and promoted these claims without scrutiny or challenge. The governance question arising is what scrutiny, challenge, or contextualisation the Charity applied before deciding to present this material as educational content.

A2. Magnet manipulation and vehicle transport of satellite tags

DI Harrison described alleged manipulation of satellite tags using magnets:

"So the use of a magnet. So these are live cases ... both have been reset with a magnet. So there's a way with these satellite tags that you can turn them on and off with a magnet ... Both of them are moved 15 or 16 kilometers away, and then the magnet was tweaked again to allow another transmission before then the tags just disappeared."

He further stated that the movement data indicated motorised transport was required:

"the movement of the SAT tag would have been would have required motorized transport to cover the distances identified in those timescales. And it would have had to have had the ability to be off road and cover them all in track, so most likely a pickup or a quad."

Concern: Whilst presented as data-led, these are hypotheses about active criminal investigations where no charges have been brought. The Charity presented these as established facts to a public audience.

A3. UK "unique globally" for tag disappearances; dismissal of tag failure concerns

DI Harrison made a sweeping claim about the UK's global position:

"these tags are designed to be used in conservation across the world. The UK is unique in the number of tags that we've had suddenly disappear and go missing. It done. You don't get these sort of figures anywhere else in the world."

Concern: This is a contested scientific and evidential issue. Satellite-tag data may be interpreted in different ways, and debate exists as to the extent to which disappearance can safely support an

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

inference of illegal killing in any given case. Our concern is not that the webinar expressed one view, but that the Charity presented that view without visible acknowledgment of uncertainty or alternative interpretation, despite promoting the session as educational content.

A4. Eight “hotspot” estates identified; high-level visits to landowners

DI Harrison described a programme of identifying and visiting estates:

“we identified eight in total ... I go to each of those hot spots with local places on the team and present all of this data to them. We go in at that very high level to make sure that the owners, the people with responsibility, know what’s going on, and this enables us to apply pressure and to ask them to work with us and to make the crime stop.”

Concern: The public dissemination of this information, in circumstances where no charges have been brought, amounts to implied identification and condemnation of specific land holdings and their owners/employees. This creates an obvious risk of harassment or vigilantism.

A5. “This isn’t a passive request or a gentle request”

DI Harrison described the nature of these engagement visits:

“this isn’t a passive request or a gentle request. People don’t like what we’re telling them, and we do get challenged a lot. It can be quite uncomfortable at the start of these meetings.”

Concern: This language, platformed uncritically by the Charity, risks reinforcing a portrayal of moorland communities as obstructive and resistant to law enforcement.

A6. Fines described as “pathetic”

DI Harrison criticised the adequacy of current sentencing:

“it can be frustrating when you eventually get something to court and then you get a fine. That’s pathetic, to be honest with you.”

Concern: Whilst frustration with sentencing may be understandable, this is a politically sensitive statement from a serving police officer which the Charity chose to platform without challenge or context. The governance question arising is what scrutiny, challenge, or contextualisation the Charity applied before deciding to present this material as educational content.

A7. Financial investigators and proceeds of crime tactics

DI Harrison described plans to deploy financial investigation:

“if they’re committing crime in order to operate, and the gains they make are also criminal. So we’ve now got accredited financial investigators and Intel officers, and we are going to be pushing for more. We’re going to try and get some funding to make that a proper functioning economic crime unit.”

Concern: The deployment of financial investigators and proceeds-of-crime language carries a highly serious connotation. Our concern is not to deny that such tools may sometimes be considered by investigators, but that the Charity promoted this framing without visible contextual challenge or explanation of proportionality in material presented as educational.

A8. Covert surveillance, undercover operatives, and informant recruitment

DI Harrison revealed planned use of covert policing tactics:

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

“We’re trying to utilize more techniques that have not been used much for wildlife crime, such as direct to surveillance, undercover recruitment, of covert human intelligence sources.”

Concern: These are among the most intrusive policing tactics available. The issue for present purposes is not whether such tactics may ever be lawful or justified, but whether the Charity presented them in an educational setting without sufficient contextual explanation, caveat, or proportionality.

A9. “Rage baiting” criticism of campaigners

DI Harrison criticised social media commentary:

“there’s a massive risk of misinformation and biased opinion. There’s a lot of rage baiting that goes on out there.”

Note: We include this for completeness. DI Harrison’s criticisms were directed at both sides of the debate, including conservation campaigners. This further underlines the one-sided nature of the Charity’s own framing of the webinar content. The governance question arising is what scrutiny, challenge, or contextualisation the Charity applied before deciding to present this material as educational content.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.