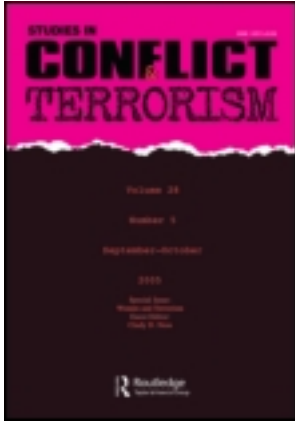


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Not Quite Terrorism: Animal Rights Extremism in the United Kingdom

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Political violence undertaken in the name of animal rights has been ongoing for some 35 years in the United Kingdom and yet such activity is commonly termed extremism, not terrorism. Existing counterterrorism measures have not been utilized by the state against individuals and groups engaged in such violence. This article explores the criminal justice response to the various types of political violence, which have been claimed by groups like the Animal Liberation Front (ALF), the Animal Rights Militia, the Justice Department, and the Provisional ALF. Moreover, the article argues that terrorist laws do not have to be used to effectively tackle single-issue terrorism such as animal rights extremism where activists employ tactics more commonly associated with a terrorist campaign.

Since the early–mid 1970s a number of animal rights groups in the United Kingdom have utilized increasingly violent tactics in the pursuit of their cause. Such tactics have included arson attacks, incendiary devices and the use of car bombs. This article will examine the British state's response to violent animal rights activism and will argue that the resort to terror laws is not necessary when dealing with single-issue causes utilizing political violence akin to terrorism. The article will provide the reader with an overview of the development of violent animal rights activism in terms of tactics, targeting, and organization thereby demonstrating the terroristic nature of past and current actions in the name of animal rights. Furthermore this article will explore such activities through the lens of single-issue terrorism. Within the academic literature reference to single-issue terrorism tends to be found in discussions of domestic terrorist threats, primarily in relation to the United Kingdom and the United States of America. Such discussions focus on a number of single-issue campaigns concerning animal rights, the environment, and abortion, which have seen the use of political violence and terrorism.¹ Conceptually, single-issue terrorism has been explored within motivational typologies, which focus on the goal orientations of the groups under analysis. Such classificatory schemes are concerned with the aims

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or reasons behind the terrorism and a differentiation is often made between those groups pursuing a fundamental or revolutionary change in the political system and those who merely wish to achieve a specific more limited political change.² It is within this latter category that single-issue terrorism is usually located either as a category in its own right or as a sub-category.

Both Crenshaw³ and Smith⁴ consider single-issue terrorism as a unique category in their typologies of motivation and political-orientation. Within Crenshaw's scheme, terrorism resulting from the actions of groups designed to stop particular practices is covered by the category "reformists," for example, the bombing of a nuclear construction site in opposition to nuclear power. Smith's typology includes the category of "issue" terrorism, which involves "militant protest to remedy perceived grievances or wrongs, such as government legislation."⁵

Other academics such as Schmid see single-issue terrorism as a sub-category of insurgent terrorism.⁶ A view echoed by Combs writing in the early 2000s when she stated that the "predominant type of insurgent terrorism in the United States in this new century appears to be issue oriented."⁷ For others, like Clutterbuck,⁸ single-issue terrorism is covered by ideological terrorism and within the literature it is often presented as either a weak extension of right-wing terrorism, for example the Army of God or left-wing terrorism in the case of the Earth Liberation Front.⁹ As has been argued elsewhere such a view is oversimplistic and masks the varied backgrounds of those involved with single-issue terrorism and the wider nonviolent social movements concerned with animal rights, the environment, and opposition to abortion.¹⁰

Thus single-issue terrorism seeks not the overthrow of governments but rather the rectification of a perceived wrong or grievance. Subsequently, in the case of animal rights those targeted are often companies and individuals associated by activists with animal abuse or exploitation as opposed to being part of the government in power. Yet despite the use of tactics more commonly associated with terrorist campaigns there has been a reluctance to label such actions as terrorism but to categorize them as extremism in that they do not pose a threat to the state. In doing so, the resources and measures to counter such political violence and to aid those targeted are not as great as they would have been if they had been recognized and considered terrorism. Consequently, in the United Kingdom this has led to the introduction of distinct measures designed to counter the threat posed by animal rights extremism and the latter part of the article will discuss the criminal justice response including the emergence of specific police units such as the National Domestic Extremism Unit, the introduction of new laws, for example, the Serious Organised Crime and Police Act 2005 and the strengthening of existing legislation including the Criminal Justice and Police Act 2001. This article will consider whether such measures have been effective in tackling such political violence. But before outlining the development of violent animal rights activism, the methodology utilized in this article's research will be noted.

Methodology

The research triangulates data on the violent tactics of animal rights activists through semi-structured interviews with relevant spokespersons from the police, from an umbrella organization, Understanding Animal Research, which seeks as its vision a "broad understanding and acceptance of the humane use of animals in biomedical research in the UK, to advance science and medicine"¹¹ and from Huntingdon Life Sciences.¹² Additionally, it examines autobiographies and writings of Animal Liberation Front (ALF) members and group publications, communiqués, and Internet postings claiming responsibility for actions

by animal rights activists, court judgments, and also secondary data sources (newspaper reports and statistics collated by other organizations).

The Evolution of Violent Animal Rights Activism

Direct action by anti-hunt activists has been utilized since the late 1950s/early 1960s and involved not only attempts to confuse the hounds by the laying of false scents and blowing of horns, but also the feeding of meat to the hounds, the prevention by activists of huntsmen digging out foxes, and the blocking of roads.¹³ It was not, however, until the early 1970s that the first actions by animal rights activists concerning a much wider focus of “animal abuse” were undertaken. Between 1973 and 1974, Ronnie Lee, Cliff Goodman, and four other animal rights activists calling themselves the Band of Mercy launched a campaign of property damage not only against fox hunts but also companies involved in animal experimentation, factory farming, and seal hunting.¹⁴ This campaign of property damage included two arson attacks on Hoechst Pharmaceuticals’s partially built research laboratory near Milton Keynes and an arson attack on two boats connected to the proposed seal cull of the Wash along the Norfolk coast.¹⁵ These attacks were followed by the first intensive primary targeting of businesses involved in the supply of animals for experimentation. Eight attacks involving property damage to buildings and/or vehicles occurred between June and August 1974. The campaign was according to Lee designed “to prevent the torture and murder of our animal brothers and sisters by evil experiments” and the group considered itself “. . . a non-violent guerrilla organization dedicated to the liberation of animals from all forms of cruelty and persecution at the hands of mankind.”¹⁶ Those targeted included a guinea pig farm where a number of animals were “rescued” (the first recorded animal liberation by the group) and the Oxford Laboratory Animal Colonies in Bicester. It was here that the Band’s short-lived campaign came to an end with the arrest of Lee and Goodman. Both activists were subsequently convicted in March 1975 of causing more than £50,000/US\$75,000 worth of damage and sentenced to three years imprisonment.

The ALF was formed by Lee in 1976 after being released early from prison with initially thirty members. The group continued with the methods adopted by the Band of Mercy, namely property damage including arson and acts of vandalism (the super gluing of locks, the pouring of paint stripper on motor vehicles, and the breaking and etching of windows) and the rescuing of animals. Those targeted included businesses involved with animal experimentation, for example, animal breeders and pharmaceutical research laboratories. Other sites of animal “abuse” and “exploitation” were also targeted including butchers’ shops, furriers, circuses, abattoirs, fast food restaurants, and racecourses. More than £250,000/US\$377,000 worth of damage was attributed to the ALF in its first year of operation.¹⁷

Writing in 1979, Lee acknowledged that “the ALF is destructive but only to property used to inflict, promote or transport animal exploitation” and that this philosophy of non-violence had resulted in actions being aborted “because of possible confrontation.”¹⁸ This pattern of impersonal attacks on property continued to account for ALF actions up until the late 1970s. In the early 1980s, an observable shift occurred in terms of the group’s tactics and targeting and resulted in the personalizing of threats.¹⁹ In 1980, the ALF paid its first visit to the home of an employee of a pharmaceutical company and daubed graffiti. This tactic of home visits was replicated the following year with a co-ordinated night of action involving the homes of 40 individuals connected with animal experimentation.²⁰

The ALF also launched a campaign against department stores selling fur products by leaving small incendiary devices timed to go off when the stores were closed. According to

convicted animal rights activist Keith Mann, the devices were designed to ignite and set off the in-store sprinkler systems, thus causing water and not fire damage.²¹ This was the case for the device planted in a Sheffield department store but in the other two attacks in Luton and Plymouth, the sprinkler systems failed to douse the fires and the stores were gutted. It is estimated that £9 million/US\$13.6 million worth of damage was caused.²²

Product contamination threats undertaken in the name of the ALF also signified a shift in tactics and a move from primary to secondary targeting, in that the general public were now legitimate targets as customers of companies that used or exploited animals. The most noteworthy hoax occurred in 1984 with the alleged adulteration of Mars Bars with rat poison. It has been estimated that Mars lost £6/\$9 million as a result of this hoax.²³ Subsequent contamination threats have included mercury in turkeys, spiked baby oil, and bleach added to shampoo.

The early 1980s also heralded the use of explosive devices being sent through the post (letter bombs) with the leaders of the four main political parties targeted in 1982.²⁴ A previously unheard of group, the Animal Rights Militia (ARM) claimed responsibility. While the ARM holds similar views to that of the ALF they are willing to harm humans evidenced by six minor bomb attacks on scientists' homes in 1985 and four car bombs in January of the following year. With respect to the January car bombs warnings were given but a further attack in April 1986 marked a change in policy to one involving "no more warnings." The group was also responsible for the planting of incendiary devices in shops in Cambridge, Oxford, York, and Harrogate and on the Isle of Wight in 1994.²⁵

The 1990s also saw the appearance of a further animal rights group, which like the ARM, was prepared to harm humans in the pursuit of an end to animal suffering. In October 1993, the Justice Department claimed responsibility for a package addressed to an individual connected with field sports, which exploded at a postal sorting office. A further thirty attacks including a number of timed incendiary devices, poster tube, and videocassette bombs were claimed by the group in the last three months of 1993. Targets included individuals connected with field sports, companies involved in animal experimentation, and furriers. In a statement released from the group, they warned:

We've sat back for years and watched AR activists ask nicely for all the abuse to stop—the more daring risk their lives and liberty but still the unacceptable number of tortured animals keeps rising. . . . We won't be asking anymore to stop messing with animals and make no more excuses for our violent intervention—they've had it too good for too long.²⁶

The group claimed a further one hundred attacks in the following year including two serious car bombs, which exploded under vehicles belonging to individuals connected to animal experimentation. Moreover, they extended their targeting to include secondary targets, namely suppliers of a service or goods to a business involved in animal "exploitation" and sent six letter bombs to companies involved in the transportation of livestock. This included cross-channel ferry companies that permitted livestock freight on their vessels. Following this action, the number of ferry companies willing to transport livestock from Britain to mainland Europe decreased. The Justice Department activist responsible for the letter bomb campaign argued it was carefully planned and researched:

This wasn't token protest, or mindless retribution, or even economic sabotage . . . it was strategic action. I researched that the meat trade is massive and can't be easily beaten, but live export is one vulnerable aspect of that trade that

could be defeated. Furthermore, the ferry companies are not primary animal abusers, they could exist perfectly well without live exports, so hit them and they will withdraw—and they did.²⁷

The increased amounts of violence that some animal rights activists were willing to use in the late 1980s/early 1990s were not matched in the late 1990s. Indeed, there was a decrease in bombings and arson attacks committed in the name of animal rights. Robin Webb, the ALF Press Officer, suggested that this reduction in violence was connected to the Labour Party gaining power in the 1997 General Election and the hope that Labour would deliver more change.²⁸ The Labour Party had pledged prior to election to ban hunting and fur farming and to establish a Royal Commission on animal experimentation.²⁹ While the use of bombs and arson decreased, animal rights activists continued to engage in liberation actions. Some of these actions have involved hundreds of animals, for example, 600 guinea pigs were liberated from a guinea pig breeder (Darley Oaks Farm) in Staffordshire and re-homed while other liberations have seen the release of some 13,000 farm-reared mink into the English countryside.³⁰

A new campaign of violence by animal rights activists appears to have been inspired by the 1998 hunger strike of Barry Horne, a convicted ARM activist in protest at the Labour Government's failure to set up a Royal Commission.³¹ The use of firebombs re-emerged in 1999 and continued into 2000 with the ALF firebombing lorries belonging to a meat firm (Weddel Swift) in Devon, Unigate Dairies, and a poultry farm in Oxfordshire.³²

Tactics by some animal rights activists have involved a mix of both legal and illegal protest where a single target is identified and subjected to an intense campaign, a blitzkrieg including demonstrations and rallies, mass protests with direct action (for example, trespass, physical damage to property and animal liberations), visits to employees' homes, firebombing of vehicles, death threats and letter bombs. Such tactics have brought about the desired end result, namely, the closure of the establishment targeted. Examples include small businesses that bred animals for scientific research including Regal Rabbits, which closed after a 12-day campaign; Consort Kennels (beagles) shut after a 10-month campaign, and Hillgrove Farm (cats) was targeted from March 1997 until its closure in August 1999.³³ Speaking of his experience, Christopher Brown, the owner of Hillgrove, stated that "My car has been firebombed, my house burned and the windows on my house broken. I have been beaten up and my wife and my staff have been attacked," he was also subject to a death threat from the ARM.³⁴

This blitzkrieg approach has continued in the new century with three prominent campaigns undertaken by animal rights activists targeting Darley Oaks Farm in Newchurch, Staffordshire; the University of Oxford and Huntingdon Life Sciences (HLS) based in Cambridgeshire. The campaign against Darley Oaks Farm, owned by the Hall family, started in 1999 with the already mentioned liberation of 600 guinea pigs by the ALF and the formation of the Save the Newchurch Guinea Pigs (SNGP) and continued until 2006. During this time, the Farm and its employees were subject to arson attacks, death threats, hate mail, hoax bombs, criminal damage (including smashed windows), and a smear campaign alleging pedophilia.³⁵ In 2004, the remains of Christopher Hall's mother-in-law, Gladys Hammond, were dug up and stolen from a graveyard and the campaign against the Halls extended to secondary targets, suppliers of goods and services to the family.³⁶ For example, a tennis group that met once a week at the farm was harassed and a tractor fuel supplier had his home visited by masked individuals who smashed windows and daubed his home and vehicles with paint stripper.³⁷ Tertiary targeting of suppliers and customers of secondary targets was also used and animal rights activists have targeted the wider community by

cutting down an electricity cable, which left local residents (some 2,000 homes) without power on three occasions.³⁸

The campaign against the University of Oxford was as a result of their decision to construct a new biomedical sciences building, which would re-house research animals. According to their literature, SPEAK was formed after the Stop Primate Experiments at Cambridge (SPEAC) stopped the University of Cambridge from building Europe's largest primate research center in 2003.³⁹ The group encouraged supporters to undertake legal protests by attending demonstrations and letter-writing and publicly eschewed the use of violence. However, Mel Broughton, a co-founder of SPEAK, was arrested in 2007 following the discovery of a number of incendiary devices at colleges of the University.⁴⁰ An ALF communiqué posted on the *Bite Back* website following their arson attack on Hertford College's boat house stated:

Oxford University's holdings now own the contract to build the South Parks lab, as far as The ALF are concerned this means that Oxford University as a whole must accept the consequences. From here on nothing you own, rent or have dealings with is off limits until the project is scrapped, To warn builders and suppliers that they are going to get some, even if their involvement comes to light years later we will not let you off the hook!⁴¹

Building contractors working on the project and suppliers of materials such as concrete were targeted by the ALF with machinery and vehicles belonging to them damaged in locations outside of Oxford including Surrey and Dorset.⁴² Work did stop on the project for some 16 months with the government underwriting the costs associated with the project.⁴³ Following the decision by a number of contractors and suppliers to withdraw from the project, new firms have remained anonymous with employees wearing masks on site.⁴⁴ The building was finally completed in 2008.

The campaign against HLS began in 1999 with the formation of Stop Huntingdon Animal Cruelty (SHAC), which seeks the company's closure.⁴⁵ In addition to public demonstrations in Cambridge and pickets and protests outside the company's premises, SHAC has also utilized secondary and tertiary targeting. As explained on their website, SHAC adopts a three-pronged approach targeting HLS's customers, without whom they argue HLS would not have an income and hence produce a profit; their suppliers who provide the resources for the company to conduct its work; and the financial arena comprised of shareholders, banks, and markets.⁴⁶ This has resulted in the company's institutional investors being targeted. For example, in February 2000, the ALF made bomb threats against HLS's major shareholders.⁴⁷ In the same month, Phillips and Drew, the fund management group, sold its 11 percent stake after allegedly receiving death threats and hate mail and in April, the first private investor to be directly targeted had his home picketed following a letter sent by a Group with No Name to 1,700 people holding HLS shares warning of doorstep protests if they did not sell their stake in the company.⁴⁸ Employees of HLS and suppliers of goods and services to the company have also been subject to a number of tactics including criminal damage (including smashed windows), arson attacks, hoax bombs, bombs, death threats, physical assaults, threatening and abusive phone calls, e-mails and letters, repeated silent phone calls in the middle of the night and false allegations of pedophilia.⁴⁹

In addition to these three high profile campaigns of the 2000s, the Association of the British Pharmaceutical Industry (ABPI) has been recording data on incidents since 2002. Table 1 shows the number of incidents recorded between 2002 and the second quarter of 2006.⁵⁰

Table 1
Breakdown of incidents by event type

Event type	2002	2003	2004	2005	2006
Abusive messages/threatening letters/text messages	23	38	108	36	6
Damage—company, personal and public property	60	146	177	85	29
Advertized demonstrations*	330	298	397	297	128
Not advertized demonstrations	500	616	680	908	296
Home visit—director	69	113	90	38	13
Home visit—employee	66	146	89	12	2
Home visit—family and friends	0	0	0	7	0
Incendiary devices	2	0	1	8	1
Personal attack—slight injury	7	1	0	6	0

*ABPI note that nearly all demonstrations involve noise, the use of megaphones and drums and are therefore, normally intimidating in nature.

Figures released in 2009 show that the combined number of attacks on the homes of directors and employees was 10 for 2008.⁵¹ While the majority of animal rights attacks have been concentrated on targets linked with animal experimentation, nearly one in five were recorded by the police as being directed at the farming industry, including sellers of foie gras and businesses with captive animals such as zoos and circuses. Reports suggest that farmers were being targeted “at a rate of one incident every nine days” and included bombs attacks, break-ins, threatening phone calls and e-mails, and the receipt of unidentified white powders.⁵² Animals, notably chickens, have been liberated with both the ALF and the Poultry Liberation Front posting claims of responsibility on the *Bite Back* website.⁵³ Surprisingly, the National Farmers Union does not record attacks on its members and while claims of responsibility posted online are often difficult to verify, a police source has suggested the vast majority are true with very few false claims.⁵⁴ Incidents that reached the media’s attention included the use of incendiary devices against separate poultry farms in Oxfordshire, in 1999 and 2006, which resulted in the destruction of four and six vehicles, respectively.⁵⁵

From the discussion above, it would appear that a number of organizations exist who undertake illegal activities, some of which are characteristic of terrorist campaigns in the name of animal rights. According to ALF guidelines: “Any group of people who are vegetarians or vegans and who carry out actions according to ALF guidelines have the right to regard themselves as part of the ALF.”⁵⁶ In terms of organization the ALF is presented as a non-hierarchical organization lacking a centralized authority structure with activists operating in autonomous cells and choosing their own targets and methods.⁵⁷ Such a set up is said to be characteristic of leaderless resistance involving “a radical movement composed of atomistic cells of like-minded activists rather than a distinct organization” and one that has been utilized by other terrorist groups including Al Qaeda.⁵⁸ This then can give rise to lone-wolf operatives such as Barry Horne, who chose to work alone as the ARM with respect to his firebomb campaign in the 1990s after having previously undertaken actions with other animal rights activists under the banner of the ALF.⁵⁹ Deborah Morrison is an example of a lone activist who sent letters attempting to blackmail companies and

individuals linked to the animal research industry over a five-year period. Lord Justice Tuckey noted that although she acted alone, she deliberately gave the impression she was part of an organized group, namely the ALF, and threatened home visits and car bombs.⁶⁰ A police source with considerable expertise in the area of animal rights extremism has suggested that the most serious incidents involving animal rights extremism have involved individuals connected to organizations that publicly eschew the use of violence such as SHAC and SPEAK and that activists within SHAC willing to use violence operated in a cell structure similar to the Provisional Irish Republican Army (IRA).⁶¹

In relation to the existence of various groups, it has been suggested that animal rights extremists associated with the ALF invented names for supposedly new groups that then took notional responsibility for acts too violent to accord with the ALF's public stance of nonviolence to humans.⁶² Robin Webb, the ALF's Press Officer, conceded that "If someone wishes to act as the Animal Rights Militia or Justice Department, simply put, the . . . policy of the Animal Liberation Front, to take all reasonable precautions not to endanger life, no longer applies."⁶³ A police source confirmed that SHAC activists would adopt the badges of either the ALF or ARM when undertaking direct action against companies connected with HLS and that their lawful activities were "just the tip of the iceberg" and that many of their activities were unlawful.⁶⁴

The picture of past and current actions of animal rights extremists detailed above has demonstrated the terroristic nature of their campaign; the article will now outline and analyze the state's response to such single-issue terrorism.

The Criminal Justice Response

The state's response to animal rights extremism has been somewhat slow with the establishment of a new police squad attached to New Scotland Yard's C 11 branch (responsible for intelligence gathering) in 1984, some eight years after the formation of the ALF. This new squad became known as the Animal Rights National Index (ARNI) in 1986 when it became an autonomous national unit liaising with animal rights officers in every force outside of London. ARNI was responsible for operating a database of intelligence on illegal animal rights activity; it provided assessments and information for police special branches to help them protect potential targets.⁶⁵ In the past it successfully infiltrated the ALF, resulting in activists being prosecuted.⁶⁶ However, within the last year, concern has arisen with regard to the infiltration of police officers into groups such as the ALF. Green Member of Parliament, Caroline Lucas, used parliamentary privilege to name an undercover police officer who allegedly planted a firebomb at a London department store in 1987.⁶⁷ The claim is strongly denied by the former officer concerned,

It was necessary to create the false impression that I was a committed animal rights extremist to gain intelligence so as to disrupt serious criminal conspiracies. However, I did not commit serious crime such as "planting an incendiary device at the [Debenhams] Harrow store."⁶⁸

Despite the prosecution of hundreds of animal rights activists who have utilized the tactics described in this article; many of whom received custodial sentences ranging from 12 months for communicating to the police a bomb hoax, three years for conspiracy to incite others to commit criminal damage and economic sabotage, five years for causing a public nuisance (involving some thousand telephone calls of an abusive, intimidatory and threatening nature), and six years for attempted arson, animal rights attacks continued.⁶⁹

Thus it can be argued that the existing criminal law and the options available to judges when sentencing those guilty of animal rights attacks did not afford a sufficient enough deterrent to dissuade activists from engaging in animal rights extremism. This view was echoed by Dr. Mark Matfield from the Research Defence Society, who remarked “It is all too obvious that the law does not provide any kind of deterrent to those motivated to break in, burn or bomb in the name of animal liberation.”⁷⁰

Following the announcement of its cease-fire by the Provisional IRA and Northern Ireland’s move toward peace culminating in the signing of the Good Friday Agreement in 1998, animal rights extremists were considered to pose the “most serious domestic terrorist threat within the United Kingdom.”⁷¹ The use of tactics characteristic of terrorist campaigns by animal rights activists had also begun to be recognized by some within the government and judiciary as being terrorism. The Home Secretary, Jack Straw, in publishing proposals to overhaul existing terrorism legislation in 1998 including a new definition of terrorism, recognized “the extension of the definition will enable counter-terrorist provisions to be used against, for example, animal rights activists who perpetrate serious acts of terrorist violence.”⁷² At the trial of Barry Horne, who was convicted on four counts of arson, five counts of attempted arson, and one count of possessing articles for making incendiary devices in relation to attacks on the Isle of Wight, Judge Simon Darwall-Smith told Horne in sentencing him to 18 years imprisonment that he had shown

no form of remorse at all, and that your intention was to cause the maximum amount of physical and economic damage to your chosen targets. You believe, it seems, that your acts were totally justified, although you accept that you will be too old when you come out to take an active role again. . . . This was urban terrorism for a particular cause—the object of putting communities in terror.⁷³

Similarly, Judge Selwood presiding over what became known as the GANDALF trial involving individuals involved in the production of various publications including *Green Anarchist* and *Eco-Vegan* and the inclusion of material (e.g., instructions how to make an incendiary device, the reporting of incidents, stories of criminal damage and calls to take direct action) therein of material likely to incite others to commit criminal damage in his sentencing remarks viewed such criminal damage and arson as terrorism. At the subsequent appeal, the appeal judges noted, “the sentencing remarks show that the judge took a very serious view indeed of the ‘terrorism’ advocated by some of the more extreme publications. . . . When a front-line bomber is convicted, he can expect sentences of upwards of ten years. For such central involvement, the word terrorism is appropriate.”⁷⁴

Yet despite these pronouncements from judges and the introduction of new terrorism legislation, the Terrorism Act 2000, covering the use or threat of action involving serious violence against the person and/or serious damage to property “made for the purpose of advancing a political, religious or ideological cause,” the government did not feel the need to apply it to animal rights extremists or to include them in their counterterrorism strategies.⁷⁵ The Terrorism Act 2000 allows for the proscription of violent animal rights groups; if for example, the ALF was proscribed, membership of the group would become an offense, as would supporting the group either financially or by wearing an ALF T-shirt or lapel badge. The group’s assets would be subject to seizure or forfeiture. Suspected ALF members could be arrested without warrant and detained for up to seven days.

Instead the government adopted an approach that focused on further criminalizing animal rights activists’ behavior by strengthening existing legislation and introducing new police powers.⁷⁶ For example, the Criminal Justice and Police Act 2001 provided new

powers for the police to move protestors away from homes, allowed for the amending of the Companies Act 1985 permitting company directors to use service rather than home addresses on the Companies House register, extended the Malicious Communications Act 1988 to cover electronic communications and amended the Protection from Harassment Act 1997 so that it is an offense for a group of people to collude with each other to cause other harassment, alarm, or distress, where each of the perpetrators only undertakes one act of harassment.⁷⁷ The Act has been successfully applied against anti-fur protesters who had been picketing a fur shop in London.⁷⁸

Additionally a number of companies and organizations have also used civil remedies, notably the Protection from Harassment Act 1997 to seek injunctions against animal rights activists preventing them from harassing employees, families and suppliers by restricting a protest's location, time, character and duration, imposing exclusion zones from which activists are banned from entering, prohibiting specific forms of harassment of protected persons including taking photographs of them or their vehicles and prohibiting abusive communications, such as letters and defamatory public notices.⁷⁹ Breach of an injunction is a criminal offense and carries a maximum five-year jail sentence. Injunctions have been granted to HLS, the University of Oxford and the GlaxoSmithKline group of pharmaceutical companies.⁸⁰ Interestingly, these injunctions have been brought against named individuals (defendants) like Mel Broughton, the co-founder of SPEAK and Greg and Natasha Avery, spokespersons of SHAC and also against the ALF as an unincorporated organization. As a result, named individuals are deemed by the court to be representative of the unincorporated organization and hence liable to be sued as its representative. The High Court ruled:

An organisation as coherent as the ALF could be represented in a legal action. Whilst it deliberately lacked the trappings of an organisation, the truth of the matter was that it was an organisation with a consistent and coherent body of people at its heart. There were active members of the organisation who, in complete agreement about aims, objectives and means, co-operated fully and actively with each other and who concealed the skeleton and sinews of the organisation for tactical reasons.⁸¹

Such an approach has also been utilized in the context of dissident republican terrorism in Northern Ireland, notably in the civil proceedings arising out of the Omagh Bombing. Families of those killed and injured claimed damages against named individuals including Michael McKeivitt and Colm Murphy and also the Real IRA.⁸²

In addition to legislative changes, there have been a number of initiatives within policing. For example, ARNI was incorporated into the Association of Chief Police Officer's (ACPO) National Public Order Intelligence Unit (NPOIU) in 1999.⁸³ This unit has been constructing a national database of various campaign groups and activists, including those associated with animal rights and is tasked with gathering, assessing, analyzing and sharing information and intelligence relating to criminal activities.⁸⁴ Furthermore, 2004 saw the creation by ACPO of the National Extremism Tactical Co-ordination Unit (NETCU) to co-ordinate a more joined up and effective response from local police forces with respect to individuals or groups engaged in criminal acts of direct action.⁸⁵ As Gay explains the use of secondary and tertiary targeting by animal rights extremists in other constabulary areas meant that the dots were not being joined up and incidents were not being regarded a part of a co-ordinated campaign.⁸⁶ This was followed in 2004 also by ACPO's appointment of a National Co-ordinator for Domestic Extremism.

Unlike terrorism which has a legal definition contained in the Terrorism Act 2000, no equivalent definition exists of domestic extremism. As explained on the ACPO website “this is because the crimes committed by those considered a domestic extremist already exist in common law or statute.”⁸⁷ Both illegal activities undertaken as part of a single-issue campaign or protest and similar activities linked to extreme left and/or right wing political campaigns are considered by ACPO as constituting domestic extremism. As Eatwell and Goodwin point out in relation to such an approach that extremism is viewed as a “spectrum of behaviour” that differentiates between peaceful protests conducted within the confines of democracy and illegal acts including public disorder, which fall outside the normal democratic process. Moreover, their argument echoes the view that such extremism does not constitute a significant threat to the survival of the state,

While it could be argued that such “extremists” have a monist view of the “truth” about animal rights or ecological deprivation, most such activists would undoubtedly see themselves as “democratic” and/or liberal in a wider context—for example, accepting a multi-cultural society in Britain.⁸⁸

In July 2004, the government published its strategy for dealing with animal rights extremists after lobbying from a coalition of interests including the Research Defence Society, Victims of Animal Rights Extremism (VARE), the bioscience industry, and companies like HLS. The strategy included a more joined up approach between the police, the Crown Prosecution Service (CPS), and courts, awareness raising in terms of the courts with respect to aggravating factors and introducing further legislative changes.⁸⁹ This included re-defining public assembly by reducing the number involved from 20 to 2 with respect of section 16 of the Public Order Act 1986 and extending the offense of aggravated trespass in section 68 of the Criminal Justice and Public Order Act 1994 to include trespass in buildings—both of these changes took effect in January 2004.⁹⁰

The police and CPS now work more closely together and 43 special prosecutors are tasked with dealing with animal rights cases.⁹¹ The change in law with respect to Anti Social Behaviour Orders (ASBOs) meant that courts could now impose an ASBO on conviction for any criminal offense and they have been given to a number of animal rights activists. For example, Heather Nicholson was made the subject of an ASBO banning her from going within 500 yards of HLS premises or approaching other companies linked to animal experimentation for 5 years.⁹²

A year later, the government introduced the Serious Organised Crime and Police Act, which contained several clauses aimed at addressing animal rights extremism including outlawing demonstrations at private addresses, the creation of a criminal offense to threaten or cause economic loss or damage through intimidation with respect to animal research organizations and those connected with them.⁹³ These clauses were important in that they try to redress the use of secondary and tertiary targeting by animal rights extremists and attempt to lessen the likelihood of firms and suppliers deciding not to offer their services and goods to primary targets. Also in 2005, the government denied entry to Steven Best, an American professor and animal rights activist, under measures introduced in the wake of the London bombings.⁹⁴

The already discussed National Co-ordinator for Domestic Extremism oversaw three specialized units, the NPOIU, NETCU, and the National Domestic Extremism Team (co-ordinated national implications assessments in relation to domestic extremism).⁹⁵ More recently, these units have been merged to form the National Domestic Extremism Unit (NDEU), which provides support to all police forces with the aim of reducing the criminal

threat from domestic extremism and in 2011, the Metropolitan Police Service became the lead force for NDEU.⁹⁶

The police have launched a number of successful operations against animal rights extremists including Operation Forton in 2005 and Achilles in 2007, which saw the arrests and prosecution of activists. Following Operation Forton, the police believed that half of the most violent animal rights activists were in prison, including the ALF's top bomber, Donald Currie, who subsequently received a 12-year sentence.⁹⁷ Operation Achilles involved some 700 police and support staff, raids on 29 British addresses and three raids abroad (one in Belgium and two in Holland). A police source suggests that after the arrests of the Averys and other SHAC activists as part of Operation Achilles, incidents of violent animal rights extremism recorded by the police dropped to zero in 2007 and there were only two recorded serious criminal incidents involving animal rights extremism reported between 2009 and 2011.⁹⁸ Both these incidents were arson attacks against Highgate Farm in Lincolnshire, which breeds rabbits for medical research. The first attack in July 2010 was claimed on behalf of the Militant Forces Against Huntingdon Life Sciences (MFAH) and in their communiqué they warned: "We'll be back when you least expect it until you stop your vile business for good. This is just a little warning, if we have to come back again the next time will not be so nice."⁹⁹ In this attack a vehicle was set alight, the following year the farm was targeted again with both an arson attack on a vehicle, and an incendiary device was thrown at a building on the farm. The Provisional RSPCA claimed responsibility for the attack and the attempt to set fire to a property where people were sleeping was described by a police spokesperson as "an extremely serious crime that could very easily have led to people living at the farm being seriously injured or killed" and marked "a new level of criminality."¹⁰⁰

As outlined above, the government has introduced a number of specific measures in relation to countering the threat posed by animal rights extremism without resorting to terrorism legislation *per se*. The question as to their effectiveness will now be addressed.

Effectiveness of Criminalization

When one looks at the Internet and the Web pages concerning animal rights campaigns, protest, and groups, the impression given is that there is a lot of activity going on in the name of animal rights, some of which involves the types of activities already discussed. However, Richard Scrase from UAR explains that "very few people can through the internet cause a lot of noise or appear to be much larger and powerful . . . than they really are."¹⁰¹

In addition to this observation, according to a police source,¹⁰² the ALF of today is somewhat different to the ALF of old as individuals connected to the old ALF have been declared bankrupt following breaches of injunctions where they were deemed representative of the group. This led to them being personally liable for the group's activities and sued by the companies and individuals who had brought the injunction initially. The use then of the monikers ALF and ARM when claiming responsibility or threatening action are now merely badges attached to actions.

The combination of extra police powers, new legislation, and amendments to existing legislation appear to be working in countering animal rights extremism. Convicted activists are receiving near maximum or maximum sentences and additionally aggravating factors are now being taken into consideration. Claims on *Bite Back* of actions by animal rights activists have declined and the types of action undertaken is more akin to the early days of the ALF, namely minor criminal damage and vandalism.¹⁰³ While HLS still retains its injunction, the company is no longer the primary focus of animal rights extremism and

as Gay notes it “is hardly ever mentioned in the last four years” with respect to animal rights actions around the country.¹⁰⁴ However, Scrase believes that the “perception within universities, within pharmaceutical industries and their supplies of the threat of animal rights extremism is very much created, is very much historic, so people remember back a decade or more and are still concerned.”¹⁰⁵ Universities UK, the organization representing vice-chancellors, in a recent report stated that it “had more of a problem with animal rights extremists than Islamist radicals.”¹⁰⁶ The University of Oxford still has an injunction in place with respect to its biomedical sciences building.

Although animal rights extremism appears to be declining in the United Kingdom, European activists have engaged in arson attacks, product contaminations, letter bombs, and widespread acts of vandalism. These have been reported on *Bite Back* and within Europol publications.¹⁰⁷ Indeed Europol believes that “UK animal rights extremists are perceived to hold a pivotal role in the animal rights scene in the EU and UK activists are frequently taking part in extremist activities throughout Europe.”¹⁰⁸ This view is borne out by the arrest of three Britons in London and Amsterdam in July 2012, in connection with both an alleged Europe-wide blackmail plot and arson attacks on the continent.¹⁰⁹

Conclusion

Animal rights extremism has a long history within the United Kingdom; the levels of violence undertaken by individuals and groups has varied over the years as has the targets of their actions shifting from primary targeting to secondary and tertiary targeting. At times the actions of animal rights extremists have resembled a campaign of terrorism, a point not lost on those targeted, some members of the judiciary, and the government. Indeed, the Prime Minister and Home Secretary noted that such activists were “organized in a quasi-terrorist cellular structure across the country” and Professor Blakemore called activists who used arson, assault, letter bombs, and threats “terrorists.”¹¹⁰ Yet, the government has resisted applying measures contained within terrorism legislation to the individuals and groups concerned and rather has responded with the promotion of a more joined up response within the criminal justice system including a closer working relationship between special prosecutors and designated police officers in respect of cases, the amendment of existing laws, and the introduction of new legislation. These measures appear to be working with the reduction of violent animal rights attacks and the unwillingness of the core activists who have been imprisoned as a result of these measures to engage in illegal behavior upon their release.¹¹¹ The British government’s decision to increasingly criminalize the extremist behavior of some animal rights activists may offer a model of how to deal with single-issue violence akin to terrorism without resorting to terrorism legislation, which can be applied to other domestic extremist threats facing not only the United Kingdom but other European countries and elsewhere in the world.

Notes

1. See, for example, Anthony Richards, “The Domestic Threat: The Cases of Northern Ireland and Animal Rights Extremism,” in Paul Wilkinson, ed., *Homeland Security in the UK* (London: Routledge, 2007), pp. 81–114 and Brent L. Smith, *Terrorism in America* (New York: SUNY, 1994), pp. 17–30.

2. See Paul Wilkinson, *Terrorism and the Liberal State*, 2nd ed. (London: Macmillan, 1986), p. 58.

3. Martha Crenshaw, "The Causes of Terrorism," *Comparative Politics* 13(4) (July 1981), pp. 379–399. According to Crenshaw, terrorists may be revolutionaries, nationalists, minority separatists, reformists, anarchists/millennarians, or reactionaries.

4. G. D. Smith, *Combating Terrorism* (London: Routledge, 1990). Smith's typology includes nationalist/separatist/irredentist, issue, ideological, exile, state and state-sponsored, and religious.

5. *Ibid.*, p. 6.

6. See Alex P. Schmid and Albert J. Jongman, *Political Terrorism* (New Brunswick, NJ: Transaction Books, 1988).

7. Cindy C. Combs, *Terrorism in the Twenty-First Century*, 3rd ed. (Upper Saddle River, NJ: Prentice Hall, 2003), p. 166.

8. See Richard Clutterbuck, *The Future of Political Violence* (Basingstoke: Macmillan, 1986), p. 22.

9. See Gus Martin, *Understanding Terrorism*, 4th ed. (London: Sage, 2013), pp. 381–420. The Army of God has undertaken a number of attacks against abortion providers since it appeared in 1982.

10. See Rachel Monaghan, "Single-Issue Terrorism: A Neglected Phenomenon?," *Studies in Conflict & Terrorism* 23(4) (October–December 2000), pp. 255–265; Colin Jerolmack, "Tracing the Profile of Animal Rights Supporters: A Preliminary Investigation," *Society & Animals* 11(3) (2003), pp. 245–263; and Benjamin Seel, Matthew Paterson, and Brian Doherty, eds., *Direct Action in British Environmentalism* (London: Routledge, 2000).

11. Understanding Animal Research. (2010). *Strategic Plan including Vision and Mission, Relating to Humane Animal Research in the UK 2011–2015*. Available at <http://www.understandinganimalresearch.org.uk/assets/document/AC13B606-EF41-5D6B-72D34ABEC6DCB82C/Strategy%20UAR%202011-2015.pdf> (accessed 14 February 2013).

12. The police source wished to remain anonymous but has considerable experience of investigating animal rights extremism, Richard Scrase was interviewed from UAR and Andrew Gay from Huntingdon Life Sciences. Gay acknowledges that between 2000 and 2003, he "was probably the most targeted person in Great Britain both personally and at work." In one incident he was attacked with a chemical spray to his eyes and physically assaulted.

13. For more details of the activities of anti-hunt protestors see Steve Poole, "1963—Protest to Resistance," *Hunt Saboteurs Association*, last modified 20 April 2012. Available at <http://hsa.enviroweb.org/index.php/about-the-hsa/hsa-history> (accessed 14 February 2013). After a fox has run into the earth, either into a foxhole or a hole made by another animal, members of the hunt try to dig the animal out, sometimes with the use of small dogs such as terriers.

14. The name Band of Mercy refers to the Royal Society for the Prevention of Cruelty to Animals (RSPCA) youth group of the late nineteenth century, which undertook direct action against hunters by damaging their guns. The RSPCA is the largest animal welfare charity in Britain. See Noel Molland, "Thirty Years of Action," in Steven Best and Anthony J. Nocella, eds., *Terrorists or Freedom Fighters?* (New York: Lantern, 2004), p. 68 and ALF, "The ALF Primer: A Guide to Direct Action and the Animal Liberation Front, 3rd ed" (c. 2002). Available at <http://www.animalliberationfront.com/ALFront/ALFPrime.htm> (accessed 14 February 2013).

15. J. J. Roberts, *Against All Odds: Animal Liberation 1972–1986* (London: Arc Print, 1986), p. 9.

16. "ALF: The Early Years Part 1," *Arkangel*, 30 (ND), p. 20.

17. For a more detailed account of the early development of animal rights extremism see Rachel Monaghan, "Animal Rights and Violent Protest," *Terrorism and Political Violence* 9(4) (1997), pp. 106–116.

18. Kim Stallwood, "A Personal Overview of Direct Action," in Steven Best and Anthony J. Nocella, eds., *Terrorists or Freedom Fighters?* (New York: Lantern, 2004), p. 83.

19. See Robert Garner, *Animals, Politics and Morality* (Manchester: Manchester University Press, 1993) and William Paton, *Man and Mouse*, 2nd ed. (Oxford: Oxford University Press, 1993).

20. Roberts, *Against All Odds*, pp. 12–13. Many of the homes visited were attacked with paint including vehicles parked outside and on driveways.

21. Keith Mann, *From Dusk 'til Dawn: An Insider's View of the Growth of the Animal Liberation Movement* (London: Puppy Pincher Press, 2007), p. 136. Mann received a custodial sentence of 11 years for criminal damage, attempted incitement, possession of explosive materials, attempted arson and escaping from custody.

22. Richard Ryder, *Animal Revolution* (Oxford: Blackwells, 1989).

23. See Garner, *Animals, Politics and Morality* and Mann, *From Dusk 'til Dawn*. The Mars hoax has also been attributed to the ARM by the Animal Liberation Front.com website. Available at <http://www.animalliberationfront.com/ALFront/Actions-UK/alfarm.htm> (accessed 14 February 2013).

24. Five bombs were sent in total: to Prime Minister Margaret Thatcher, a government official in the Home Office (Timothy Raison), Michael Foot (Labour), Roy Jenkins (Social Democratic Party), and David Steel (Liberals). The device sent to 10 Downing Street exploded, causing burns to the office manager's hands and face. The other devices were intercepted before they reached their targets.

25. See Rachel Monaghan, "Terrorism in the Name of Animal Rights," *Terrorism and Political Violence* 11 (4) (1999), pp. 159–169 and Mann, *From Dusk 'til Dawn*.

26. Justice Department, "Press Release," *Liberator* (Winter 1994/Spring 1995).

27. "The Justice Department," *Animal Liberation Front.com*. Available at <http://www.animalliberationfront.com/Philosophy/AbuseLinked/justiced.htm> (accessed 14 February 2013). Gurj Aujla was apprehended by the police and pleaded guilty to sending the devices. He received a six-year custodial sentence from the courts.

28. Will Woodward, "Our Aim is to End Suffering Too, Says Man at Top of Militia Hit List," *The Guardian*, 8 December 1998, p. 3.

29. A Royal Commission is an independent, statutory body established by Royal Warrant, which investigates a matter of important public concern and makes recommendations on any actions to be taken.

30. "Six Hundred Individuals Taste Freedom," *Arkangel* 22 (ND), p. 16 and "Mink Corner," *The Independent*, 2 October 1998, p. 5.

31. Horne received an 18-year sentence (the longest ever sentence handed down to an animal rights activist), for a two-year firebomb campaign, which caused an estimated £3 million/US\$4.5 million of damage. He undertook three hunger strikes lasting 35, 46, and 68 days, respectively. A fourth hunger strike in 2001 lasting just two weeks resulted in Horne becoming the first British hunger striker to die since 1996.

32. "Animal Group Claim Firebomb," *The Independent*, 12 May 1999, p. 9 and Tracy McVeigh, "£500,000 Firebomb Attacks Blamed on Animal Rights Activists," *The Express*, 2 August 1999, p. 7.

33. See "Targeted Campaigns," *Animal Rights Extremism Information*. Available at <http://www.animalrightsextremism.info/animal-rights-extremism/history-of-animal-rights-extremism/targeted-campaigns> (accessed 17 May 2013). The farm's owner, Chris Brown, received a hoax device through the post from the Provisional ALF and a warning that "It could easily have been for real. You have been lucky this time." "Animal Lib 'terrorists' target cat breeder," *Oxford Mail*, 3 March 1998. Available at http://www.oxfordmail.co.uk/archive/1998/03/03/Oxfordshire+Archive/6640879.Animal_lib_terrorists_target_cat_breeder/ (accessed 17 May 2013).

34. Adam Jankiewicz, "Cattery Closure Delights Protesters," *The Independent*, 14 August 1999, p. 7.

35. See John Illman, *Animal Research in Medicine: 100 Years of Politics, Protest and Progress* (London: RDS, 2008), p. 57 and BBC News, "Timeline: Farm under Siege," 4 May 2006. Available at <http://news.bbc.co.uk/1/hi/england/staffordshire/4176446.stm> (accessed 17 May 2013).

36. Reuters, "British Animal Rights Protesters Admit Plotting against Farmers," *New York Times*, 12 April 2006. Available at http://www.nytimes.com/2006/04/12/world/europe/12britain.html?_r=1&pagewanted=print&oref=slogin (accessed 14 May 2013). See also Olinka Koster and Anika Bourley, "In Terror of the Extremists," *Daily Mail*, 26 October 2004, p. 4. While the SNGP publicly denied they had been involved in the theft of the body and the ARM claim responsibility for

the act, four members of the SNGP were linked to the theft and convicted in 2006 of conspiracy to blackmail which involved using the theft as part of their campaign.

37. *Ibid.*

38. Sandra Laville, "Plea for 'Protest Free' Zone Refused," *The Guardian*, 3 December 2004, p. 2.

39. "Join SPEAK," *SPEAK* (c. 2004).

40. "Animal Rights Fire-Bomber Jailed," BBC News, 13 February 2009. Available at <http://news.bbc.co.uk/1/hi/england/7885687.stm> (accessed 14 May 2013).

41. "Received Anonymously by Activists in the UK," *Bite Back*, 6 July 2005. Available at http://www.directaction.info/news_july06.05.htm (accessed 14 May 2013).

42. Mann, *From Dusk 'til Dawn*.

43. Anna Fazackerley, "Public Cash to Secure Future of Animal Labs," *The Times Higher*, 3 March 2006, p. 1. The article suggests that up to £100 million was made available; this is around five times the original estimated cost of the proposed building.

44. Sandra Laville, "Intimidation Fears Prompt Firm to Quit University," *The Guardian*, 19 May 2006. Available at <http://www.guardian.co.uk/uk/2006/may/19/animalwelfare.businessofresearch> (accessed 14 February 2013).

45. Although SHAC distances itself from the most extreme behavior of anti-HLS activists, its founding members have received custodial sentences. For example, Greg Avery was sentenced to four months imprisonment in 2000 for threatening to kill an HLS executive and in 2001 he received a 12-month sentence (with six months suspended) for orchestrating a campaign of harassment against HLS staff, shareholders, and financial backers. He has previously served sentences for ALF offenses.

46. "Introduction to SHAC," *Stop Huntingdon Animal Cruelty*. Available at http://www.shac.net/SHAC/shac_intro.html (accessed 14 May 2013).

47. Jill Treanor and Dan Atkinson, "City Chaos after ALF Hoaxes," *The Guardian*, 5 February 2000. Available at <http://www.guardian.co.uk/business/2000/feb/05/uknews> (accessed 14 February 2013).

48. Matt Born, "Animal Rights Group Tracks Down Lab Investor," *The Telegraph*, 11 April 2000. Available at <http://www.telegraph.co.uk.mo=rrrrrrq&pg=/et/00/4/11/nalf11.html> (accessed 14 May 2013).

49. See livenote of the trial *R v Avery and Others* at Winchester Crown Court, 21 January 2009.

50. "'Sea Change' in Level of Attacks by Animal Extremists," ABPI, 26 July 2006. Available at <http://www.abpi.org.uk/media-centre/newsreleases/2006/Pages.260706.aspx> (accessed 26 October 2011). The ABPI were contacted for figures from the third quarter of 2006 onward but they declined to furnish the author with them: "Unfortunately we cannot share this data outside of the ABPI. I am sorry that we couldn't provide more help." ABPI, e-mail to author, 27 October 2011.

51. "ABPI Welcomes Fall in Animal Rights Attacks," ABPI, 19 January 2009. Available at <http://www.abpi.org.uk/media-centre/newsreleases/2009/Pages.190109.aspx> (accessed 26 October 2011). This was the last media release from ABPI posted on their website concerning animal rights attacks.

52. Jasper Copping, "Animal Rights Extremists Target Farmers," *The Telegraph*, 15 April 2007. Available at <http://www.telegraph.co.uk/news/uknews/1548609/Animal-rights-extremists-target-farmers.html> (accessed 14 May 2013). Between March 2006 and February 2007, there were 39 reported incidents recorded at farms using intensive farming methods, see Caroline Lovell, "Animal Extremism Attacks on Farms are Low," *Farmers Weekly*, 27 March 2007. Available at <http://www.fwi.co.uk/articles/27/03/2007/102576/animal-extremism-attacks-on-farms-are-low.htm#UyaidI3veM> (accessed 14 May 2013).

53. Examples include "47 Hens were Liberated," *Bite Back*, 23 September 2012. Available at http://directaction.info/news_sep23_12.htm (accessed 4 December 2012) and "The Poultry Liberation Front have been Busy in the South East of England," *Bite Back*, 10 December 2011. Available at http://directaction.info/news_dec10b_11.htm (accessed 4 December 2012).

54. National Farmers' Union, e-mail to author, 31 October 2011 and interview with author, 15 January 2013.
55. John Staples, "Animal Protest Wrecks Lorries," *The Independent*, 2 August 1999, p. 2 and "Extremists Admit Fire Bombing," Oxford Mail, 20 November 2006. Available at http://www.oxfordmail.co.uk/news/1030873.extremists_admit_fire_bombing/ (accessed 4 December 2012).
56. "Credo/Guide," *Animal Liberation Front.com*. Available at http://www.animalliberationfront.com/ALFront/alf_credoguide.htm (accessed 4 December 2012).
57. "ALF: The Early Years Part 1," p. 18.
58. See Bradley McAllister and Alex P. Schmid, "Theories of Terrorism," in Alex P. Schmid, ed., *The Routledge Handbook of Terrorism Research* (London: Routledge, 2011), p. 242; Paul Joosse, "Leaderless Resistance and Ideological Inclusion: The Case of the Earth Liberation Front," *Terrorism and Political Violence* 19 (September 2007), pp. 351–368 and George Michael, "Leaderless Resistance: The New Face of Terrorism," *Defence Studies* 12(2) (2012), pp. 257–282.
59. Mann, *From Dusk 'til Dawn*, p. 507.
60. R v Morrison [2008] EWCA Crim 22.
61. Interview with author, 15 January 2013.
62. David Henshaw, *Animal Warfare* (London: Fontana, 1989).
63. "Staying on Target and Going the Distance: An Interview with the UK ALF Press Officer Robin Webb," *No Compromise*, Fall 2003. Available at <http://www.nocompromise.org/issues/22/index.html> (accessed 4 December 2012).
64. Interview with author, 15 January 2013.
65. Frank Gregory, "Policing the 'New Extremism' in Twenty-First-Century Britain," in Roger Eatwell and Matthew J. Goodwin, eds., *The New Extremism in 21st Century Britain* (Abingdon: Routledge, 2010), p. 95.
66. Lorenz Otto Lutherer and Margaret Sheffield Simon, *Targeted* (Norman: University of Oklahoma Press, 1992).
67. See "Undercover Policeman 'Fire-Bombed Shop', MPs Told," *BBC News*, 13 June 2012. Available at <http://www.bbc.co.uk/news/uk-politics-18423441> (accessed 4 December 2012). Parliamentary privilege grants certain legal immunities such as immunity from legal action in terms of slander for Members of both Houses of Parliament that allow them to perform their duties without interference from outside the House.
68. Rob Evans and Paul Lewis, "Call for Police Links to Animal Rights Firebombing to be Investigated," *The Guardian*, 13 June 2012. Available at <http://www.guardian.co.uk/uk/2012/jun/13/police> (accessed 14 June 2012).
69. See R v Michael Dunbar and Neil Johnson (1987) 9 Cr. App. R. (S.) 393; R v Booth, R v Wood and R v Molland (1998) All England Transcripts; R v Holliday and another [2004] EWCA Crim 1847; and R v Vivien Jane Smith (1994) 15 Cr. App. R. (S.) 594.
70. Mark Matfield, "How the Law Deals with Animal Rights Extremism," *RDS News* (October 1994), p. 16. RDS was formed in 1908 by supporters of animal research within the scientific and medical community as a lobby group and merged with the Coalition for Medical Progress to form Understanding Animal Research at the end of 2008.
71. Professor Paul Wilkinson, "Inside the ALF," *Dispatches*, Channel 4 television (1998).
72. Richard Ford, "Animal Activists Face Ban as Terrorists," *The Times*, 18 December 1998, p. 12.
73. R v Horne [1999] EWCA Crim 520.
74. R v Booth, R v Wood and R v Molland (1998).
75. Terrorism Act, 2000. Available at <http://www.legislation.gov.uk/ukpga/2000/11/contents> (accessed 14 June 2012). Animal rights extremism is omitted from the Home Office's counterterrorism strategies, which only deal with international terrorism. See Home Office, *Countering International Terrorism: The United Kingdom's Strategy* (London: Home Office, 2006), *Pursue Prevent Protect Prepare: The United Kingdom's Strategy for Countering International Terrorism* (London: Home

Office, 2009) and *CONTEST The United Kingdom's Strategy for Countering Terrorism* (London: Home Office, 2013).

76. Home Office, *Animal Rights Extremism: Government Strategy—Consultation Document* (London: Home Office, 2001), p. 1.

77. Home Office, *Animal Rights Extremism: Government Strategy—Responses to the Consultation Document* (London: Home Office, 2001), p. 2.

78. See *Silverton and others v Gravett and others* [2001] All ER (D) 282 (Oct).

79. “Laws, Injunctions and Policing,” *Understanding Animal Research* (ND). Available at <http://www.understandinganimalresearch.org.uk/policy/animal-rights-extremism/law-injunctions-and-policing/> (accessed 14 June 2010).

80. See *Huntingdon Life Sciences Group PLC and others v Stop Huntingdon Animal Cruelty* [2007] EWHC 522 (QB); *Chancellor, Masters and Scholars of the University of Oxford and others v Broughton and others* [2006] EWHC 2490 (QB); and *Smithkline Beecham plc and other v Avery and another* [2007] EWHC 948 (QB).

81. *Chancellor, Masters and Scholars of the University of Oxford and others v Broughton and others* [2006].

82. See *Breslin v McKenna, RIRA, McKevitt, Campbell, Murphy and Daly* [2005] NIQB 18. McKevitt is currently serving a 20-year prison sentence in the Republic of Ireland for directing terrorism and Murphy was tried and convicted in a Special Criminal Court in Dublin for conspiring to cause the bombing but was released after it was revealed that Gardaí officers (Irish police) had changed interview notes used in the case.

83. ACPO is a private limited company that leads the development of policing practice in England, Wales, and Northern Ireland. It serves as a forum for chief police officers to share ideas and advises government in relation to terrorist attacks and civil emergencies.

84. “Domestic Extremism,” MI5 (2013). Available at <https://www.mi5.gov.uk/home/the-threats/terrorism/domestic-extremism.html> (accessed 14 May 2013).

85. “What is Domestic Terrorism?” *NECTU*, last modified 7 October 2010. Available at <http://www.nectu.org.uk/de/> (accessed 4 April 2012).

86. Interview with author, 26 March 2013.

87. “National Domestic Extremism Unit,” *ACPO* (2011). Available at <http://www.acpo.police.uk/NationalPolicing/NationalDomesticExtremismUnit/AboutNDEU.aspx> (accessed 4 April 2012).

88. Roger Eatwell and Matthew J. Goodwin, eds., *The New Extremism in 21st Century Britain* (London: Routledge, 2010), p. 11.

89. Tony Blair and David Blunkett, *Animal Welfare—Human Rights: Protecting People from Animal Rights Extremists* (London: Home Office, 2004), p. 4.

90. *Ibid.*, p. 12.

91. “Chief Constables Welcome Government Stance on Animal Rights Extremism,” ACPO, 20 July 2004. Available at <http://acpo.police.uk/news/2004/q3/Animal.html> (accessed 28 October 2005).

92. Nick Fielding, “British Animal Rights Activists Spread Violence on Continent,” *The Sunday Times*, 2 October 2005. Available at <http://www.timesonline.co.uk/0,,1-523-1807047-523,00.html> (accessed 28 October 2005).

93. Serious Organised Crime and Police Act, 2005. Available at <http://www.legislation.gov.uk/ukpga/2005/15/contents> (accessed 28 October 2010).

94. Elizabeth Davidson, “Are New Anti-Terror Rules ‘Excessive’?” *LNB News*, 8 September 2005, p. 3.

95. Gregory, “Policing the ‘New Extremism,’” p. 95.

96. “National Domestic Extremism Unit,” *ACPO*.

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110. See Blair and Blunkett, *Animal Welfare*, p. 9 and Colin Blakemore, "Comment: Ridding the Country of this Scourge," *The Telegraph*, 7 March 2007. Available at <http://www.telegraph.co.uk/news/uknews/1544745/Comment-Ridding-the-country-of-this-scourge.html> (accessed 14 February 2013). Professor Blakemore has been the subject of many incidents of animal rights attacks including incendiary and nail bombs being sent to his home. See Sholto Byrnes, "Animal Rights, Human Wrongs," *New Statesman*, 28 February 2008. Available at <http://www.newstatesman.com/life-and-society/2008/02/animal-rights-blakemore> (accessed 14 February 2013).

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