March 2015

BVA and BVZS joint response to the Defra consultation on proposed changes to the Control of Trade in Endangered Species Regulations

1. The BVA is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

2. The British Veterinary Zoological Society (BVZS) is a specialist division of the BVA which is involved in almost every aspect of the care and welfare of exotic pets, zoo animals and wildlife. It aims to promote the advancement of veterinary knowledge and skill in the maintenance of the health and welfare of non-domesticated animals; to encourage proper housing and conditions for such animals; to encourage full use of veterinary services by wild animal establishments and by the owners of exotic animals, to promote the international exchange of veterinary knowledge of non-domesticated animals.

3. We welcome the opportunity to respond to this consultation. We also support the proposal to update and review the endangered species legislation and remove anomalies.

Answers to Questions

Question 1 – Do you think the proposed amendments and new Provisions A-N and P are appropriate and will improve enforcement of CITES requirements in the UK?

4. We welcome the proposal under Provision J to amend Section 9 of COTES and remove the requirement for a veterinary surgeon to be present when samples are taken for testing from any CITES specimen. We agree that a veterinary surgeon should only be required to be present when invasive samples are required to be taken from live animals. It would be acceptable for a ‘suitably qualified person’ to take samples from plants or wood from endangered trees, providing there is a clear definition of ‘a suitably qualified person’.

5. We note that it can be expensive and time consuming to bring in diagnostic samples of CITES specimens and so this should be taken into account when making any amendments to the CITES requirements.

6. We are not in a position to comment on the remainder of the proposed amendments and new provisions under A-N. It seems sensible – as proposed under Provision P - to merge the various pieces of CITES related legislation into a single statutory instrument, providing all relevant powers or controls are retained.
Question 2 – Do you think the proposed changes to ports of entry and exit, Provision O, to ensure compliance with the requirements of the EU regulation, will continue to enable traders to efficiently import and export to and from countries outside of the EU?

7. Providing the new designated ports have appropriate facilities for handling and potentially holding live animals, as well as contingency plans in place (particularly in terms of animal welfare and disease control), then we can see no objection to these proposals.

Question 3 – Do you think the existing offences contained in COTES are fit for purpose and should remain?

8. We do not have any comments in relation to the existing offences contained in COTES.

Question 4 – Are you aware of any additional evidence on costs and benefits that would inform the assessment above, or other costs and benefits on enforcement which have not been identified?

9. We note that the approach of the Pet Advertising Advisory Group (PAAG) to help ensure the ethical sale of pet animals online, could be applied in relation to trade in CITES specimens and products via the internet.

Question 5 – Are you aware of any additional evidence on costs and benefits that would inform the assessment above or other costs and benefits on the ports of entry and exit proposals which have not been identified?

10. We do not have any comments in relation to the costs and benefits on the ports.