

BAMF RESPONSES TO CONSULTATION ON PROPOSALS TO AMEND ASSIMILATED UK WILDLIFE TRADE REGULATIONS (October 2025)

(as inserted into the appropriate fields of the online consultation form)

Import permits for Annex B specimens

Q14: Option 2 – BAMF recommends the option to replace import permits for Annex B specimens with import notifications

Q15: BAMF understands that the principal benefit of import permits for worked antiques imported into the UK is the statistical data about import volumes.

Using import notifications in place of import permits for Annex B specimens would:

- reduce costs and delays for antique dealers and auction houses
- reduce costs for the APHA and allow resources to be deployed elsewhere
- maintain the collection of data in respect of the importation of antiques incorporating Annex B species.

Q16: BAMF requests that Defra performs a computation as to the cost savings that would arise from a dealer or auctioneer in worked antiques not having to pay a fee for an import permit. BAMF does not have this information. This would involve Defra extracting from its own records the typical annual number of imports of worked Annex B antiques and multiplying that figure by the cost to a trader applicant of applying for a permit.

The trader cost (per permit) comprises:

- (a) the permit fee charge
- (b) the cost of the time taken by the business to apply for the permit, such as:
 - understanding the forms they need to complete
 - gathering relevant information for an application
 - completing and submitting the relevant form(s)
 - responding to any questions posed by APHA staff
 - checking the resulting permit issued
 - liaison with the shipper to ensure they receive the relevant permit.

UK domestic stricter measures

Q59: Option 2 – BAMF would recommend the publication of additional guidance to clarify which species are subject to stricter measures and how these are applied in practice.

Q60: BAMF considers that the publication of additional guidance would be a quicker and less expensive option to underpin a process that works, rather than the costs and delays likely to accompany legislative change.

BAMF considers that it would be helpful to provide a list of the species subject to stricter measures on the APHA's .gov web pages, whilst still encouraging applicants to contact APHA to obtain copies of the more detailed information about those measures.

In the alternative, should DEFRA opt for Option I (legislation) – which BAMF does NOT recommend - BAMF strongly recommends including the requirement that any proposed restrictions in relation to the use of the “worked antique exemption” be the subject of prior consultation and be based upon published scientific rationale. This is because objects that were removed from the wild and worked more than 70 years ago have little or no impact on current living populations of fauna or flora.

This supports the Principles stated as underlying the Consultation, that protections “be based on the best available evidence” and “avoid disproportionate cost, burdens or impacts on businesses or traders” .

Revising the criteria for exceptional Port of Entry use

Q65/66: Option I – BAMF recommends the introduction of a set of exceptional use criteria into the WTRs, under which APHA, as the UK Management Authority, may temporarily designate a non-standard port for a specific shipment. This would remove the need for Ministerial sign-off in urgent cases, on the basis of the conditions specified in the Consultation and thereby improve efficiency and reduce unnecessary uncertainty and delay.

Suspensions Regulation (EC Reg 2019/1587)

Q76: Option I – BAMF recommends that the Secretary of State be allowed to publish a list of species-country combinations, in consultation with the UK Scientific Authorities, where the issuance of import permits is prohibited.

Q77: Article 4(6) of Regulation 338/97 requires any decisions to add or remove species from the list of species prohibited from importation into the EU/Great Britain to be made after “**taking account of** any opinion from the Scientific Review Group”. BAMF recommends that the wording “*taking account of*” be maintained in any legislative change to the UK version of Regulation 338/97, and that the lesser reference to “*in consultation with*” in the Consultation document not be used.

BAMF considers that this would ensure that revised legislation would ensure that such decisions would be in accordance with the underlying Principle in the Consultation that protections “be based on the best available evidence”.

Proposed amendments to the CITES fees and charges

Q87: Option I – In principle, BAMF supports flat fees for all permits and certificates, with the important proviso specified in the answer to Question 88.

Q88: BAMF represents dealers and auction houses/salerooms operating as small and medium sized businesses in every region across the UK. It may be the case that following an auction, a saleroom might submit applications for several permits at the same time; the removal of the current charging structure for a single application covering several permits could create a significance additional cost to these businesses, at a time when their margins

are under particular pressure. This could create an additional threat to the viability of these important regional employers.

BAMF therefore recommends that a capping arrangement be adopted, whereby the charge for an application made for more than a specified number of certificates/permits at the same time would result in an appropriate capped fee, in line with the current fee structure.

BAMF submits that to have an uncapped fee for all permits would clearly contravene the underlying Principle stated in the Consultation to "avoid disproportionate costs, burdens or impacts on businesses / traders."