

Sarah Jones – Ports of Entry  
Defra  
CITES Policy Branch  
Wildlife Species Division  
Zone 1/17  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6EB

11 October 2007

Dear Ms Jones

**Re: Consultation on COTES Ports of Entry**

Wildlife and Countryside Link is pleased to have this opportunity to input to the consultation on the designation of ports of entry approved under COTES Regulations. Wildlife and Countryside Link (Link) brings together 39 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management and food production and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of over 8 million people in the UK.

Link believes that it is imperative that there are suitable controls at UK borders through HM Revenue and Customs to sufficiently implement the minimum requirements for CITES enforcement. Therefore the decision to be made following this consultation is going to be highly important in clamping down on illegal wildlife trade into the UK and the EU.

We believe that all approved ports of entry for CITES species should have the proper facilities and resources for this task. Namely there must be the correct facilities to safely hold the animals for the duration of their transit through the port and to inspect them. Equally important, there must be suitably qualified full time staff to examine the animals checking that all imports meet CITES requirements.

We therefore feel that the only suitable ports of entry are the airports at Heathrow and Gatwick. This is a combination of your suggested options 2 and 3.

Heathrow has suitable facilities and equipment to accept, temporarily house and inspect any type of live animal. It also has full-time staff fully qualified to examine and identify CITES species.



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"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Hilary Allison, Director: Alexia Wellbelove

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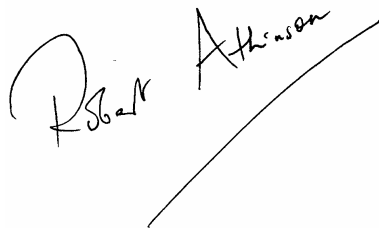
Gatwick, which can accept live animals excluding ungulates and equidae, also has suitable facilities to temporarily hold and examine imported animals. Whilst staff here have limited training on CITES identification, it is within a close enough proximity to Heathrow to allow Heathrow staff to provide assistance. This may be through the animals being moved to Heathrow or trained staff visiting Gatwick.

Manchester airport, however, we feel is not suitable at this time. It is allowed to receive other animals not including ungulates or equidae, but does not have adequate facilities or staff to hold and examine animals in a safe and secure manner. Additionally there are no staff here with adequate training to identify CITES species.

It is for these reasons that we believe that Manchester airport should not be included as a port of entry under the COTES regulations. Otherwise this will be seen as the weak point of entry for any unscrupulous traders that might wish to slip through the net. Before Manchester could be considered as a suitable port of entry there would need to be significant improvement in its facilities and an increase in the number and training of staff. This is why Link strongly urges that only Heathrow and Gatwick airports be considered as ports of entry under COTES regulations.

Thank you for consideration of our comments.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dr Robert Atkinson', written over a diagonal line that extends from the bottom left towards the top right.

Dr Robert Atkinson  
Chair, Wildlife and Countryside Link Wildlife and Trade Working Group

On behalf of the following organisations:

- International Fund for Animal Welfare
- Marine Conservation Society
- Royal Society for the Prevention of Cruelty to Animals
- WWF