



# ANNUAL REPORT 2009 - 2010

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## DIRECTORS' REPORT

Another difficult year! The industry has been hit by a range of issues that have had an impact on retail sales.

Some have been with us for some time, like the economic down turn, and will be for some time to come. Some were impossible to foresee, others may have been. No one could have predicted the volcanic ash cloud, at a bad time of year for the trade and the knock on consequences it had. On the other hand, the apparent laxity of import controls identified by European Commission inspectors in Singapore, which led to a ban on bringing in fancy goldfish, might have been avoided.

At long last, a decision was made on the KHV status that the UK should declare for zoning. Whether any individual member agrees with the outcome or not, at least some certainty, at least until a review of the decision to declare the UK an infected zone is undertaken in just over 12 months time. If there is one then the silver lining to the black cloud of KHV is the much greater awareness of biosecurity issues within the industry. As governments become more risk averse and look ever more closely at protecting themselves from "emerging diseases" -the unknown unknowns- the general principles learnt by the industry over the last 10 or so years will serve us all well.

However, we shouldn't end in a down beat way. The "green" credentials of the industry have been brought to the attention of the world's governments in a very positive way. Not all of the conservational benefits our industry contributes are intentional -for instance, when we buy fish from the Amazon, we don't intentionally pay to enhance carbon fixation. Not all our customers installing ponds do so to provide breeding sites for amphibians, but they do. As we tend to carry the can for any unintentional harm caused, it seems therefore right and proper we claim some praise for the unintentional good we are responsible for.

We hope 2011, volcanoes and economic circumstances allowing, will see a growth in sales.



# CHIEF EXECUTIVE'S REPORT

Our industry relies on a number of “permissions”. Permission from the government to import and trade is essential. Imports of live animals may bring risks. To a greater or lesser extent, our imports are seen as a threat to native fish stocks and the ecology of our waterways. For each type of animal imported, the government must make an assessment on behalf of the public as to whether the risk associated with a particular import is acceptable or not. Industry can make representations as to what response is reasonable and proportionate, but the decision is ultimately one government must make.

Farmers, exporters and indeed governments in exporting countries may have views about the health standards that the UK or EC should find acceptable. However, in practical terms, unless high-level diplomatic challenges are to be made through the World Trade Organisation, all such concerns are of little relevance. Within international rules, any country may seek to protect itself from threats it believes might be posed by the import of one or a number of species from any particular country.

Over the past years, we have seen several examples of severe action being taken following EC inspection in Malaysia and more recently in Singapore. In both instances, EC officials made the limits of their patience quite clear. Ultimately, both countries were denied access to coldwater markets in the UK, Southern Ireland, Denmark, Sweden and Finland.

To an extent, it would appear some exporters, whether businesses or countries, have tried to identify the least that might be acceptable to importing authorities. It might be better for all concerned to match or exceed the biosecurity expectations of the importing countries and businesses. When they have fallen below the standards required, businesses in exporting countries have been damaged but so have businesses in the UK. It would be interesting to try to calculate whether the cost of not meeting the EC requirement in Malaysia and Singapore matched the eventual value of lost business.

It remains OATA's role, as far as we are able, to ensure any import controls developed by the government are logical, based on science but with due regard to a pragmatism based on practical experience.

## Spotlight on Business and Biodiversity

The Convention on Biological Diversity (CBD) distributes a magazine on business and biodiversity. At its most recent meeting, it distributed 10,000 copies to the thousands of people present from over 170 countries and hundreds of conservation organisations present.



An article by OATA was published in this edition. The article highlighted some of the very positive, even if sometimes unintentional, impacts on biodiversity that it and our customers have. The points raised included the following points:

- Marine ornamentals are the highest value added products regularly collected from reefs.

- In one area of the Amazon where the majority of local income comes from catching and exporting ornamental fish, there is as much as 8 billion (yes, billion) tonnes of carbon fixed. This might be released if the collection of ornamentals was to cease and the collectors adopted more damaging activities such as logging, ranching and extensive slash and burn agriculture.

- That garden ponds provided massive numbers of habitats in which native amphibians could breed in the UK (see the item on the Big Pond Dip for further details).

- The work undertaken on raising awareness among the public (in excess of 500 million in the Northern Hemisphere) on the invasive species topic conducted by OATA and other trade association in Europe and North America.

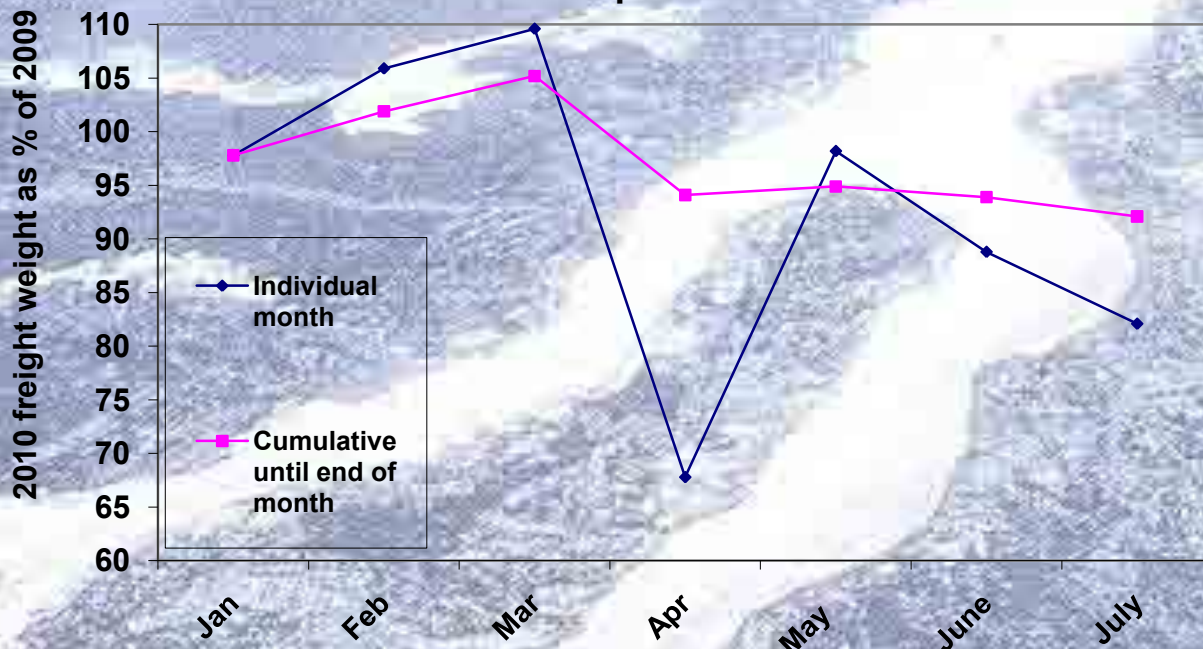
## Trade affected by Volcanoes and Singapore Health Certificates

Volcanoes and EC inspections in a country exporting to the UK dealt a double whammy to imports this year.

Until the dust cloud from the unpronounceable Icelandic volcano (Eyjafjallajokull) passed over and closed UK airspace during April, import volumes appeared buoyant compared to last year. During April, imports were reduced to two thirds of what might have been expected. The impacts of the shorter airspace closures during May were less dramatic.

Import trade seemed to be returning to a similar level on a month by month basis as 2009 when the import of coldwater SVC susceptibles (in particular fancy goldfish) were banned in May and down tumbled imports again. The ban followed an EC inspection that revealed that Singapore was accepting imports and shipping them on without either quarantining them appropriately or ensuring their import certificates were adequately robust.

**Comparison of Ornamental Fish - Freight Weight of Imports**



## AQUA 2010

We hope those of you who attended AQUA 2010 as either visitors or exhibitors will agree it was a resounding success. The outcome was particularly remarkable as until a little over a year ago, the whole idea was merely a far from clearly defined idea.

OATA was invited to become involved in the organisation of AQUA 2010. To enable us to do this most effectively, a separate company, OATA Impact Exhibitions Ltd, was formed. OATA has a majority interest in the show company and will benefit from the success of AQUA 2010 and subsequent shows.

All involved in the organisation of the show must be congratulated. However, particular mention must be made of the work of Dave Pool of Tetra, Ruth Low of Gordon Low Ltd., and Ray Valovec from the OATA office who acted as directors of the show company, along with Gordon Thomas and Annie Dyke of Impact Exhibitions who were responsible for the practical arrangements.



O.I.O.O.

This weird acronym is emerging in conversations with civil servants more and more regularly. “OIOO” stands for “One In, One Out” and refers to law making. In effect, to introduce a new law or other regulatory measure, another one should be repealed. This sounds fine in theory, but we must wait to see what it means in practice during the tenure of the new government.

The last government also sought to reduce regulatory burdens on business. However, this was not always all it seems. The Animal Welfare Act, while generally welcomed, was deemed a deregulatory measure because it alone replaced 20+ laws that were repealed. However, the offences and powers in those repealed laws were transferred to the new Act and additional measures such as the “welfare” offence added. Thus, while the number of laws on the statute book diminished, the number of offences and breadth of the law increased.

# KHV Consultation

The KHV consultation finally huffed and puffed itself to a conclusion in the middle of the year. As ever, it proceeded at a sedate pace and even when it was submitted to Ministers, the election and change in government brought about months of delay.

The final decision to opt for “Category V - diseased zone” was quite the opposite of what had been previously indicated as DEFRA’s preferred option which was “Category IV - eradication zone”.

During the consultation, OATA did not state any preference for the Category DEFRA should choose. However, we were keen to ensure that the process used in reaching the decision was robust and logical. We have expressed doubts about the methodology used in the impact assessment. To determine the distribution of KHV in UK fisheries, samples were taken from a small selection of sites thought to be at a “high risk” of infection. The prevalence of KHV, determined by the detection of antibodies using the ELISA test, found in this carefully selected “high risk” subset was then used to estimate the infection rate in all, almost by definition lower risk, fisheries in England and Wales. This seems almost bound to overestimate fishery infection rates. A similar concern was raised as the number of reported outbreaks was used as the detection rate, a method likely to provide an under estimate of the actual occurrence of clinical outbreaks.

As was always likely to be the case, the decision was largely political in nature. Until recently, the political imperative appeared to be to maintain as high a health status in the UK fisheries as possible leading to the impetus to eradication status. More recently, as cost-saving came more to the political foreground, the decision was reversed.

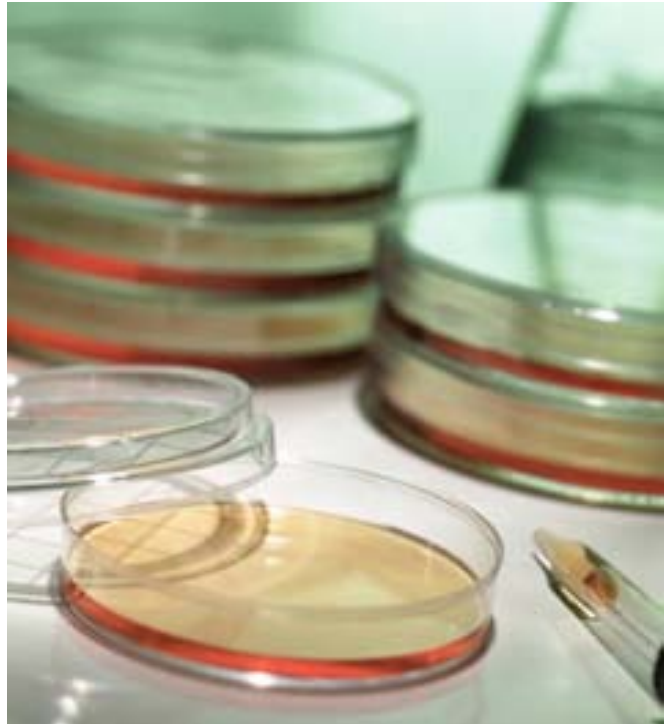
The decision will be reviewed in just over a year’s time.

Of course, owners of any animal are under a legal duty of care to protect them from disease. So both for this reason and to satisfy the commercial imperative of providing healthy fish to customers, no doubt OATA members will continue to try their best to avoid importing the live wild type virus that can cause disease. To do otherwise threatens the reputation and creditability of the industry in the UK.



# EUS - Epizootic Ulcerative Syndrome

EUS is a fungal disease that was only relatively recently discovered in Japan. From there, it has spread to Australia and widely throughout the Far East. At various times, the cause of the disease was thought to have been a virus, bacteria, a mixture of pathogens and now a fungus.



The concern for our industry lies in the move by the EU to require that species susceptible to the disease be proven free of the pathogen at the time of import. Immediately, and for the first time, this meant freshwater tropical fish could become subject to full and rigorous import health certification stating they were known to be free of the disease.

When first proposed, the species covered included a number imported by our industry in particular some gourami species. OATA, with colleagues in Ornamental Fish International (OFI), lobbied hard to ensure there was a two-year delay in the implementation of the control measures to allow time for testing to prove disease freedom to be carried out. This transitional period is due to end on 1<sup>st</sup> Jan 2011.

In the interim, a number of lists of species which are susceptible to or vectors of EUS have been proposed. None are the same, even when appearing in reports by the same organisation prepared within 12 months of each other. The list of species whose trade might be impacted expanded to include koi and goldfish. In any event, such a listing would have had massive repercussions for the industry. All the more so as the change was only made recently making it impossible to carry out the usual two year testing procedures to prove freedom from a disease.

Once again, OATA and OFI worked together to get breathing room for the industry while EC officials decided what they wanted to do. As part of our lobbying, we all pointed out that many 100s of millions of fish had been imported from areas affected by EUS over the last couple of decades and no problems had arisen. Thus, while theoretically there might be issue, practical experience indicates that there isn't.

Indeed, OATA's position that the listing of EUS by the EC is "A solution looking for a problem" is becoming increasingly strident.

## Be Plant Wise

About 200 retailers were actively involved in the OATA-supported Be Plant Wise campaign mounted by DEFRA, the Welsh Assembly and the Scottish Parliament. The key component of the campaign was to raise awareness among the public about how to dispose of excess pond plants responsibly. In many ways, this built upon the “Keep your pond plants in the garden...” message that OATA has long promoted. Responsible disposal methods include composting and putting in the local authority green bins.

In October 2010, participating companies and organisations received letters of thanks signed by Ministers from England, Wales and Scotland. A signed letter from one Minister is relatively rare, but one signed by three is an extraordinary occurrence. The letter very clearly said that businesses participating in the Be Plant Wise campaign were a key part in the solution to the problems that invasive pond plants can cause.

A second phase of public awareness has just been launched to coincide with the pond cleaning out season. We hope that even more retailers will help their customers act responsibly by using the Be Plant Wise campaign materials to raise public awareness of this increasingly important topic.



## Update of the Standard Pet Shop Licence Conditions

OATA is participating in work to update the 1998 Local Government Association Standard Pet Shop Licence Conditions. Of course, it is no good having standard conditions if local authorities ignore their own documents.



## The Big Pond Dip

OATA have been helping to promote the Big Pond Dip organised by Pond Conservation. In essence, the project is designed to encourage members of the public to look at what wildlife they can find in their garden ponds. It is intended that the project will continue for years to come through reports that are likely to be produced annually. Results from all seasons, not just spring, will make the project more comprehensive.

The first of annual report "The Big Pond Dip 2009" was published in May. Among the key findings were:

- About one in ten garden ponds were in excellent condition as wildlife habitats and a further third were in good condition. That said, all ponds offered useful habitat to amphibians and aquatic invertebrates.
- Larger ponds were most likely to provide better habitats than smaller ones.
- The use of tapwater to fill ponds meant that tapwater borne pollutants such as nitrates and phosphates reduces the benefits to wildlife. The depth of many ponds was 30cms or more which may also reduce their benefits to wildlife.
- The more different types of plant present in the pond, the greater variety of wildlife present.
- Ponds containing fish contained as wide a variety of invertebrates as those without. Amphibians were just as likely to breed in ponds with fish present; however, it might be suspected that many of the tadpoles will be eaten by any fish present.
- Garden ponds provide between 1.5 and 2.5 million habitats in which all native amphibians are seen to breed to a greater or lesser extent.

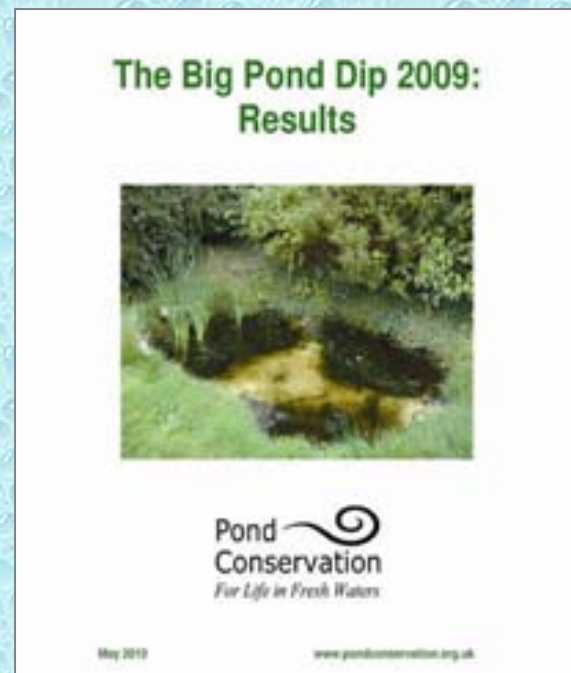
The last point is particularly note worthy as over the last century, the number of natural ponds, albeit with a gradual recovery in recent years, has shown a massive decline. Garden ponds seem to have provided a refuge that may make up for this deficit of natural ponds. A recent DEFRA report recently identified "brown field" areas such as ponds in urban gardens, as offering stepping-stones between populations of wild animals that would otherwise become isolated.

We hope more members will encourage their customers to take part in the Big Pond Dip in the future.

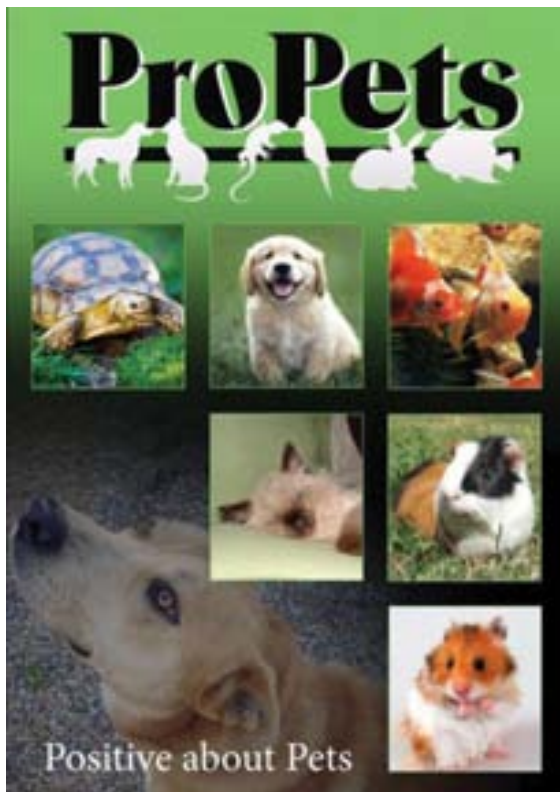
More information on the report of the Big Pond Dip 2009 can be found on the Pond Conservation website at:

<http://www.pondconservation.org.uk/bigponddip/firstresultsbigponddip.htm>

And on the project more generally at: <http://www.pondconservation.org.uk/bigponddip>



# ProPets



ProPets is a group of trade associations including OATA (who chair the group), REPTA, Pet Care Trust, the National Office of Animal Health, the Pet Product Retail Association and the Horticultural Trades Association.

This year, they produced a brochure that was distributed to all the candidates of the major parties prior to the general election. Its message, which was in its title, was "Pets are an essential part of the social and economic fabric of our country".

The key messages were:

- Every other constituent they spoke to probably lived in a household that owned pets

- If the pet trade vanished, then the governments could lose tax income and savings in spending on the NHS equivalent to an increase in income tax of 1p in the £.

This was designed to attract attention and has successfully done so with a number of politicians.

## *A European Equivalent*

Many of the issues we deal with come from initiatives in the European Commission. To help address these issues, we work closely with Ornamental Fish International and the European Pet Organisation. As a contribution to their work, we have extended the work OATA carried out in ProPets to cover the whole of Europe. Though not completed, based on data from National Statistics Offices and Eurostat (the statistics office in the EC), it can be estimated that the pet trade may contribute over €10 billion a year.

The figures on savings on the health budget are staggering. A ten-year study in Germany estimated that pet owners had fewer doctor appointments, saving €5.5 billion in 2005 alone.

## ***Garra rufa***

As long ago as the 2007-2008 Annual Report OATA was expressing some concerns over the use of *Garra rufa* as “Dr. Fish” in beauty parlours in this country. These fish nibble at the skin on any part of the body immersed in water removing debris from the surface. Interest has grown since and there has been a flurry of pieces about this topic in national newspapers over recent months.

There appear to be some businesses especially established to sell custom-built systems to house these working fish. Others companies import large numbers of fish just for use in beauticians. As the interest grows further, members may be approached, or already have been, for either equipment or fish.



Irrespective of the use made of the fish, their welfare is best served if appropriate equipment and advice is available-both could be provided by OATA members. However, we would advise great care is taken when accepting orders. Groups such as the RSPCA are now taking a closer interest in the welfare of fish used in the beauty

industry so there is very real potential for adverse publicity for all concerned.

If any *G. rufa* are sold by retailers to beauticians for use in their parlours, they are under a legal obligation to give appropriate advice. Such advice might include information on measuring and maintenance of water quality, frequencies of water changes and handling, nutrition and the harm that might be caused by perfumes, deodorants, athlete’s foot creams and the like.

These fish may be used in the same way in many other areas of the world which have neither the animal welfare laws, nor the public concern about animal welfare nor indeed the aggressive animal welfare rights groups that we have in the UK. What might be socially acceptable elsewhere in the world may not be here.

Using *G. rufa* in health spas, beauticians and the like is clearly not our remit but adverse publicity could spill over into our sector and thus is of concern to all of us. We don’t want to be drawn, by association, into another industries fight.

# Invasive Species



Predictably, this topic remains a key issue for our industry. Few if any other industries move greater numbers of more species between more places more regularly than the ornamental fish industry does. This has not passed unnoticed at any political level. In the UK, all the devolved administrations are all looking at invasive species issues closely, as are the European Commission and the Council of Europe. However, interest does not stop there. At the recent Conference of the Parties (COP) of the Convention on Biological Diversity (CBD), representatives of over 170 countries considered reports on the invasive potential of “Pets, Aquarium and Terrarium” species and gaps and inconsistencies in the international laws controlling their movements.

It is important to keep an eye on measures that might be suggested or taken as a result of the deliberations at such meetings. Almost every one of those countries imports or exports ornamental fish and so might take action. If unreasonable suggestions gain ground, they might impact the industries supply chains to the UK even if they are not implemented in the UK.

The CBD set up an ad hoc Experts Group to make recommendations in two years time. OATA intervened in the discussions to say that we, as well as other trade associations, had already done much and should be part of the expert group. It remains to be seen whether industry will be given space in such a group but there was support by a number of countries that suggest industry will play a part in establishing an international regime concerning this issue.

## Wildlife and Countryside Act - Sales Bans

We still await news on whether or not there will be a ban on sale of some plant species proposed under the Wildlife and Countryside Act. The outcome could have a major impact on our sector. For instance, *Elodea canadensis* and *Lagarosiphon major* are in line to be banned. OATA continues to argue that little would be achieved by a ban on either species as they are widely distributed in the wild already. We will of course keep members updated as and when more information becomes available.

## Review of the Import of Live Fish Act (ILFA)

During the course of the year, ILFA has been subject to consultation in England and Wales.

As usual, one of the inferences contained in this was that if species couldn't be sold as ornamentals, they would not be able to escape to the wild. Little regard being given to the act of release, why it occurred or any consequences of release. Thus, concern has again been expressed over the appearance of sturgeon in fisheries and note taken that they remain available within the ornamental fish sector.

Over the course of several months', correspondence with the Environment Agency and others, it is clear that since 1998, little effective enforcement action has been taken at fisheries where sturgeon (some so big there is no way they could possibly have come direct from the ornamental fish trade) have turned up.

It would be remarkable if species such as sturgeon were removed from our trade when little or no action is being taken by the relevant authorities when they turn up in fisheries that most of the public regards as "the wild". If dissuasive action is not taken when releases are commercially exploited, then removal of species from the sales for stocking in garden ponds (if any originate there) will just drive a demand for imports from the continent.

Part of the review will concern which species may be owned and which are not. At the moment, a "black" list of what may not generally be held or kept has been produced. In the future, a "white" list of all the species that may be traded may be adopted. A list of all the species recorded in trade currently will be compiled. Any species new to trade would then not be permitted until a risk assessment had been completed. OATA favours the "black" list approach, however, many species -for instance, cool water, hill-stream species- might be added to it.



## Government Spending Cuts Bite

Much has been in the newspapers about the government's spending cuts. DEFRA has been subject to cuts of more than 30% in some areas. It remains to be seen what the final impact of the cuts are, but they were evident as early as August when the Animal Health Agency, responsible for the operation of Border Inspection Posts (BIPs) through which ornamental fish enter the UK, reviewed their operational hours. While BIP operations at Heathrow and Gatwick remain unaltered, Manchester will now clear fish only from 7 am to 7 pm.

OATA challenged this decision up to Ministerial level. The consistent response being that the BIP at Manchester just did not have the vets to offer a greater level of service due to maternity leave and a recruitment ban. When first challenged, the Manchester BIP authorities indicated they would give up to six weeks notice of any changes, but when push came to shove, less than two working days notice was given. Some small leeway was given after representations to the relevant Ministers private office but only for three weeks.

The current government has said it wants to encourage business to help trade the UK out of the current economic situation. One wonders how that will be possible if government spending cuts means UK plc is no longer "open all hours"



## Laws to Get Rid of

Almost as soon as they entered office, the new Coalition Government opened a website asking people to post details of laws and procedures that they thought should be repealed or changed.

OATA posted comments on two regulations, namely:

- The law that requires import permits for CITES Appendix II species. The procedure to obtain the permit pretty well just repeats the procedures already undertaken in the country of origin. The costs associated with this repetitious procedure often means the costs of the permits, which supports government administrative structure in the UK, exceeds the amount paid for the corals which directly supports sustainable livelihoods in coral reef areas.

The second law we cited was that which requires vets to sign import documents for live animals, irrespective of whether or not there was any risk associated with them.

## Care Sheets

During this year, OATA has developed care sheets for over 30 different groups of fish species. These are designed to give members of the public basic information on caring for the fish and other organisms they buy. It is a requirement under the Animal Welfare Acts that information is made available at the time of sale. The information will also help members of the public meet their obligations under the same laws.



## Videos

Over the last half year, OATA have produced a series of short, engaging videos aimed at showing potential and existing hobbyists what can be achieved with keeping fish, and more importantly, how to be successful at fish keeping. The videos currently cover indoor coldwater aquaria, tropical freshwater aquaria and marine aquaria. Each category comprises of two videos; the first providing a brief introduction to fish keeping with the second providing helpful fish keeping tips from how to set up an aquaria to maintaining good water quality. Two further videos covering pond are currently in production and should be available next year.

The videos will be made available on the OATA website, on YouTube.com and can also be embedded into members' websites if desired. If facilities allow, these videos can also be played in store.



## GM Fish

Unfortunately, we have again received notice from DEFRA officials that GM ornamental fish have been imported into the UK. It was quite clear that once it had been realised what had been imported, the relevant authorities were alerted.

We believe that these imports are accidental. However, we would urge members to redouble their efforts to make sure their suppliers don't slip up on this issue.

It is interesting to note that GM salmon are in the news again as this technology was applied to this species very early in its development. In those early days, the intention was to introduce genes into salmon that induced cold tolerance and rapid growth. If ever cold-tolerance were introduced into ornamental fish, especially in groups like the cichlids that interbreed so easily, we would face the nightmare of having to prepare risk assessments for every species. These costly procedures would at least damage and maybe even bring to a grinding halt the tropical trade.



So far, only various colour genes have been introduced from jellyfish into tropicals, but it is not perhaps where the process starts but where it might take us that is the issue. *Imagine the furore if a shoal of three foot long, pink and blue zebra danios were seen swimming up and down the Thames outside the houses of Parliament!!!*

## Review of Animal Welfare Act

DEFRA announced a review of this Act to see how effectively, or not, it was being implemented. The consultation was limited and responses had to be consolidated via a group known as the Companion Animal Sector Council (CASC) which is chaired by Peter Scott.

OATA responded saying that contrary to what was promised there has been no secondary legislation to ensure that pet shop licensing is carried out to a

single common standard. We went on to say that since local authorities have had the right to licence or not particular businesses any bad pet shops remaining in business were largely due to their lack of diligence.

We pointed out that as in other industries, like greyhound racing, an independent third party certification scheme, such as being devised by the Pet Care Trust, may be better than having 450 local authorities interpreting animal welfare as they see fit.



## Review of EU CITES Import Charges

A couple of years ago DEFRA increased the charges for imports charges under the EU's equivalent of CITES to £59. This often means the value of corals in a consignment is exceeded by the cost of the permits required. CITES (the Convention on the International Trade in Endangered Species) is implemented in the EU by the Wildlife Trade Regulation. Import permits, which are not required by CITES for corals and seahorses, are an EU "harsher domestic measure". OATA has long argued that CITES should be about ensuring the survival

of the species and building capacity in range stated to ensure that is the case. Fees for the EU harsher domestic measures as applied in the UK net the government approximately £1 million per annum. This money is not to directly assist conservation but calculated on a full cost recovery basis of DEFRA's costs in issuing permits etc.

Thus we are please to here DEFRA is undertaking a project to decide what "on the ground" conservation benefits are actually delivered by the "harsher domestic measures".

## Crimestoppers

At various times over the last decade, the office have gathered information about spates of fish thefts. Some have been coldwater fish from garden and aquatic centres, while others have been of whole shop full of marines. There sometimes appear to be a couple here, a couple a hundred miles north and then 100 miles west. This might be a deliberate pattern or chance encounters with media interest in a subject.

Police reports on several occasions have said the raids looked well organised. For fish thieves to be successful, they must have good husbandry skills and efficient means of capture and transport, not to mention a good market.

Police forces have not collated incident reports from their divisions yet alone nationally. This is a little surprising as some of the values reported of the fish stolen are similar to that of small bank robberies.

To help determine if there is a real problem or a figment of our imagination, OATA has helped establish an anonymous reporting mechanism. So if you or your customers have had fish stolen or been offered fish for sale in suspicious circumstances, please report the event to Crimestoppers.



# Things to Look Out for in 2011

<b>KHV</b>	Preparations for the review of the KHV decision.
<b>EUS</b>	EUS decision implemented on January 1 <sup>st</sup> or delayed until 2013.
<b>Animal Welfare Act</b>	Results of the review of the Animal Welfare Act in England.
<b>Pond Plants</b>	Sales bans (or not) on pond plants such as <i>Elodea Canadensis</i> and <i>Lagarosiphon major</i> .
<b>Access and Benefit Sharing</b>	Increased sensitivity to “biopiracy” of fish species in some countries.
<b>ILFA</b>	Revision of ILFA with possibility of white lists of species you can trade in and risk assessments of any species you want to add to the list.
<b>DEFRA</b>	Outcome of the DEFRA review of the conservation benefits, if any of, of EU CITES harsher domestic measures e.g. import permit charges.