

# PARLIAMENTARY DEBATES

HOUSE OF COMMONS  
OFFICIAL REPORT  
GENERAL COMMITTEES

## Public Bill Committee

### IVORY BILL

*Fourth Sitting*

*Thursday 14 June 2018*

*(Afternoon)*

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CLAUSES 7 TO 11 agreed to.

Adjourned till Tuesday 19 June at twenty-five minutes past Nine o'clock.

Written evidence reported to the House.

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No proofs can be supplied. Corrections that Members suggest for the final version of the report should be clearly marked in a copy of the report—not telephoned—and must be received in the Editor’s Room, House of Commons,

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**Monday 18 June 2018**

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**The Committee consisted of the following Members:**

*Chairs:* †STEVE McCABE, MARK PRITCHARD

- |  |   |
|--|---|
| † Cameron, Dr Lisa ( <i>East Kilbride, Strathaven and Lesmahagow</i> ) (SNP) | † Pollard, Luke ( <i>Plymouth, Sutton and Devonport</i> ) (Lab/Co-op)                                     |
| † Chalk, Alex ( <i>Cheltenham</i> ) (Con)                                    | † Rutley, David ( <i>Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs</i> ) |
| † Courts, Robert ( <i>Witney</i> ) (Con)                                     | † Smith, Henry ( <i>Crawley</i> ) (Con)   |
| † Davies, Mims ( <i>Eastleigh</i> ) (Con)                                    | † Sobel, Alex ( <i>Leeds North West</i> ) (Lab/Co-op)   |
| † Debbonaire, Thangam ( <i>Bristol West</i> ) (Lab)                          | † Turley, Anna ( <i>Redcar</i> ) (Lab/Co-op)  |
| † Donelan, Michelle ( <i>Chippenham</i> ) (Con)                              | † Twist, Liz ( <i>Blaydon</i> ) (Lab)   |
| † Harrison, Trudy ( <i>Copeland</i> ) (Con)                                  |   |
| † Hayman, Sue ( <i>Workington</i> ) (Lab)                                    | Gail Poulton, <i>Committee Clerk</i>  |
| † Hoare, Simon ( <i>North Dorset</i> ) (Con)                                 |   |
| † Latham, Mrs Pauline ( <i>Mid Derbyshire</i> ) (Con)                        |   |
| † McCarthy, Kerry ( <i>Bristol East</i> ) (Lab)                              | † <b>attended the Committee</b>   |

## Public Bill Committee

Thursday 14 June 2018

(Afternoon)

[STEVE McCABE *in the Chair*]

### Ivory Bill

#### Clause 7

PRE-1947 ITEMS WITH LOW IVORY CONTENT

2 pm

*Question (this day) again proposed,* That the clause stand part of the Bill.

**Sue Hayman** (Workington) (Lab): The Opposition are quite happy with clause 7, which relates to pre-1947 items with low ivory content. Concerns were raised in evidence, both written and oral, by some members of the art world that the 10% volume could be problematic. We saw a silver teapot with quite a large ivory handle, and there were concerns that that could fall foul of that exemption and that removing the handle would cause irreparable damage to the artefact. My understanding is that the measure encompasses most items that fall into this category, but it would be interesting to hear from the Minister any comments that were made following the oral evidence we heard on Tuesday from art experts.

**Alex Chalk** (Cheltenham) (Con): I want to make a few remarks about clause 7, and I do so having in mind the views of some small-scale auction houses that have raised concerns with me. The concerns are intended to be constructive, and I recognise that there are important competing arguments, but the question is whether it is really necessary to require the registration of pre-1947 items with low ivory content. The concern has been raised that that could lead, however unintentionally, to the law of unintended consequences such that a clause that was designed to preserve and exempt could inadvertently lead to damage and destruction, and I will explain why.

The first thing to note is, of course, that clause 7 is designed to catch items with a low ivory content of below 10%. I am advised that 10% is in fact the lowest or equal lowest figure in similar jurisdictions and that ordinarily 20% tends to be the threshold.

What sort of items are we talking about? We might be talking about an oak chest that has ivory escutcheons—the small amount of ivory that might be around a keyhole—or a teapot, which the hon. Member for Workington referred to, that has an ivory spacer. In other words, there is a small sliver of ivory between the teapot and the handle that is designed to insulate the handle and ensure that the heat is not conducted along it. We are talking about very small amounts of ivory. Such items cannot sensibly be referred to as an ivory object, because the volume of ivory is so tiny.

The auction houses make the point that these items do not really contribute to the ivory trade. I will explain their concern. Let us suppose that items come to light in the course of the sale of a deceased relation's property and it emerges that one item contains a vanishingly small amount of ivory. Their concern is that there could be a perverse incentive on the part of the owner to say, "Oh, for goodness' sake, registering this is going to be onerous and difficult. Either we should simply try to prise out the piece of ivory, thereby damaging the item itself, or we should destroy it altogether." I am also advised that some of the items that we could be considering are brown wood furniture, which is not as desirable as it once was, and therefore there is a risk that the items could end up in a skip, which is clearly not what anyone wants to achieve.

I absolutely recognise that there is a powerful counter-argument, which is that if we want the whole exemption regime to be coherent, it is important that every single ivory content item that is exempt is properly registered, and there is a risk, therefore, that we could create inconsistency. I entirely acknowledge that powerful argument, but it seems to me that the auction houses have a point, so I invite my hon. Friend the Minister to comment on the issue of registration.

It is key that we ensure that the registration process is quick, affordable and not too bureaucratic, so that when an item is discovered in the course of a furniture sale, instead of being told that it will cost a huge amount of money and time to defer the process, an individual can be advised that it will be a matter of a short, proportionate pause and a small, proportionate outlay to ensure that the item becomes legal. The undesirable incentives that I have referred to would, therefore, be avoided.

**The Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs (David Rutley):** It is good to serve under your chairmanship, Mr McCabe, and thank you for keeping me in order. Like other hon. Members, I was keen to get to my feet to talk about this important Bill.

A few points have been raised. I am grateful for the broad support for the *de minimis* category. The hon. Member for Workington asked whether we had heard from any art galleries and so on about the 10% threshold. In general, we monitor their feedback following our Tuesday evidence sessions. So far, interestingly, there has been very broad support for what we are doing. In the spirit of being collaborative, as we have been today, we will share any further information with her.

My hon. Friend the Member for Cheltenham raised several important points about the registration process. It is important that we are trying to establish a prohibition and that only small exemptions would be available. Sometimes, when we start to think about those exemptions, there is a tendency to want to try to open them up, but actually, we are trying to narrow them down. That means that we need to have a consistent approach and to be able to monitor the application of the exemptions using the electronic database that we are setting up. It will not be burdensome on resources; it can obviously absorb large amounts of data. Those resources will be needed to carry out spot checks and compliance checks.

The Government want to ensure that we have as limited a burden as possible on the application, so it will be easy to do online, but it is critical—my hon. Friend

caught the balance in his contribution—to ensure that data is available to enforcement authorities and potential purchasers of the item to ensure that they act in compliance as well.

**Alex Chalk:** I appreciate that the details may have to be settled in due course, but can the Minister give an indication of the approximate cost of an application and the approximate length of time it will take to complete?

**David Rutley:** It will be a relatively speedy process. On the cost, we have said that small fees will be involved. That will become clear as we carry out the work. The aim is to recover the costs involved in establishing the IT system and the compliance arrangements, rather than to create surplus funds. The fees will be small and the process will be as simple as possible, but it is there to create a consistent approach.

**Sue Hayman:** I have a small comment about the points made by the hon. Member for Cheltenham. In relation to the fairness and openness of what we are trying to achieve, keeping the exemptions as small and as tight as possible is important, and we would support that. The enforcement officers we heard from on Tuesday made it clear that they would want as few exemptions as possible in order to do their job successfully.

**David Rutley:** I thank the hon. Lady and, once again, we strongly agree on the same point. We are saying that the exemptions need to be robust, and my hon. Friend the Member for Cheltenham is saying that they also need to be proportionate. I think we have the balance right.

It is also important to reiterate to my hon. Friend that although people may want to sell some of those items, and we are putting a ban in place to make that more difficult, they can be gifted or donated to other people who might appreciate or have space for them. Certain charities might benefit, but the items would not be for resale. Gifts and donations are fine. We just have to look again at the way we treat ivory. This involves a cultural change for some people. We are all on a journey and the measure will help in that regard.

*Question put and agreed to.*

*Clause 7 accordingly ordered to stand part of the Bill.*

## Clause 8

### PRE-1975 MUSICAL INSTRUMENTS

*Question proposed,* That the clause stand part of the Bill.

**David Rutley:** The clause exempts from the prohibition of commercial dealing certain musical instruments containing ivory. Subsection (1) sets out that if a musical instrument is made before 1975 and less than 20% of it contains ivory, the item will be exempt, provided that it is registered as set out in the Bill, from the prohibition of the trade of ivory in the UK.

Subsection 2(a) defines a musical instrument as an item whose primary purpose is to be played as a musical instrument. It explicitly excludes items that, although they may technically be used as an instrument—in other words, they could produce a sound or be used to

beat a rhythm—that was not their primary purpose on manufacture. That also extends to items intended as ornaments.

Subsection 2(b) confirms that items used as an accessory to play a musical instrument, such as a violin bow, are within the definition of the clause. The exemption recognises that musical instruments, particularly expensive ones, continued to be made with ivory until late into the 20th century. As the Government have no intention to unduly affect artistic and cultural heritage, nor to unduly affect the livelihoods of professional musicians, the exemption extends on the general de minimis exemption.

We heard from the musicians sector about the significant value of some instruments and the role they play in professional musicians' retirement plans. The backstop date at which Asian elephants were first listed under appendix I of CITES was 1975, before the poaching crisis of the 1980s. Evidence provided through the consultation, including from the Musicians Union, showed that the vast majority of commonly played and traded instruments, including violins, pianos and bagpipes, contain 20% ivory or less by volume.

**Sue Hayman:** The evidence we took on Tuesday from musicians was interesting. They supported and broadly agreed with the measure, and were pleased with the exemptions because they will allow them to continue to work as musicians, whether professional or amateur. It was particularly interesting, however, to hear them say that they have had to deal most recently with the rosewood legislation, which CITES brought in last year. Rosewood is a protected species and that has had a big knock-on effect on the music industry because of the number of instruments made from rosewood.

The musicians said that that legislation had resulted in them having to fund a large education programme for their members and the wider music industry, so that the music industry understood that rosewood was now a protected product. They said that the legislation has had a large impact on the music industry, both in manufacturing and in buying and selling. I raise the issue because they said that it has been a really big challenge for them. Although they welcome and support the Ivory Bill, it would also create similar challenges, as they would have to do a fairly large education programme right across the industry—all sorts of people have musical instruments and many people have very old instruments, which might be in their attic—just to get that understanding across.

Education was discussed on a number of occasions in the evidence sessions. What kind of educational support programmes and guidance are the Government considering in relation to the Bill? Are they seeking to work in particular with industries, such as the Musicians Union, to get that information across to its members? Otherwise, it is a huge burden on them to do it on their own.

2.15 pm

**Kerry McCarthy** (Bristol East) (Lab): I start by drawing the Committee's attention to my entry in the Register of Members' Financial Interests.

It was good to hear the Musicians' Union and the other associations that gave evidence confirm that they were delighted with the progress that has been made. I know that when an ivory ban was first talked about,

[Kerry McCarthy]

they were very concerned that, given all the talk about the antiques trade and the obvious focus on conservation and animal welfare, musicians would get left out and owners of instruments containing a small amount of ivory would be overlooked. It is very good that the Government have listened to them and seem to have reached an agreement. They also confirmed that although the ivory ban was introduced in two tranches—in 1975 and 1989—they were comfortable with the fact that the ban applies to all instruments post-1975.

However, I still have a couple of concerns. I think that we will get on to one of them later, when we discuss clauses 10 and 11. It is about the fact that the registration certificate travels with the owner. So, if an owner sells an instrument, the new owner has to go through the whole process again, as opposed to the certificate travelling with, or being attached to, the instrument. I would have thought that something similar to car logbooks could be used, whereby there is just a change of name on the certificate; but we will discuss that later.

During the evidence session, there was some proposal about a blanket ban on online sales and I know the Minister would have noted that there was concern about that. However, it does not look as if anyone is bringing forward such a ban. We did not discuss it when we were considering clause 1, so I think that we are okay on that point.

However, one issue that musicians need clarifying in the Bill is whether exempted instruments that are sent abroad for repair will be allowed to return to their owner without any huge delays or additional paperwork. I think that such instruments would be at the higher end of the market. Because of their rarity, intricacy and value, they often need to be sent to other countries for intricate repairs, so it would be a real problem and a huge shame if they were to be confiscated, either abroad or on their return through customs. So I should be very grateful to the Minister for clarification of whether he has looked into that; if not, perhaps he could make efforts to address that issue in the Bill.

My other concern echoes what my hon. Friend the shadow Minister said about how we raise awareness of this provision. The Musicians' Union can obviously reach out to its own members, and if people are professional musicians or own a musical instrument business, this is something they may well hear about. However, I am concerned that an awful lot of people, including some people who may just own guitars, may not hear about it.

When Alan Johnson was Home Secretary, people praised him for having come from a humble background and having attained such an exalted position, but what he still really wanted to be was a musician and I think that Tony Blair was of the same opinion as well. Indeed, I suspect that there are rather a lot of men of a certain age who have still got their guitars sitting there, which they have had for a rather long time. [Laughter.] It is people such as that who may well be affected by the Bill, so how do we spread word about it to them?

I have a friend who is not only a musician but a guitar repairer; he has been doing guitar repairs for more than 30 years and is attached to a particular shop. He must have worked on thousands of guitars over that time, including some incredibly intricate ones. In fact, he repairs not only guitars but ukuleles, mandolins and

banjos. I remember that one instrument in particular was inlaid with all sorts of mother-of-pearl and lights that flashed every time a string was plucked. That one was incredibly rare and required an awful lot of work.

What is interesting is that I spoke to him and asked, "Were you aware of the rosewood ban?" He said yes, because the shop knew about it and had stopped selling rosewood guitars; it sells fake rosewood guitars now. However, when I mentioned ivory to him—bear in mind that this is somebody who for 30 years has taken guitars to pieces and put them back together again, and twiddled with the knobs, and got vintage knobs off one thing and put it on another thing—he said, "Oh, I just assumed it was bone on the guitars that I worked on." He had no idea that he might be working on instruments that had ivory on them. I suppose the shop will get to hear about the legislation, but he does a lot of repairs for people who just phone him up or musicians who pop in and give him their guitars to work on.

I will tell my friend about the legislation, so he will be in the clear, but how do we ensure that all those musicians who come in and out of the shop realise that they have ivory in their guitars? Obviously, that also applies to all sorts of other instruments that might have a small, perhaps not very noticeable, piece of ivory in them. How will they know what the requirements are? The registration certificate is quite complex and a lot of people will just not bother completing and submitting it, even if they are slightly aware, because they are unlikely to be caught. There will be a job of work to do to ensure that people do not fall foul of the law without meaning to.

**Liz Twist** (Blaydon) (Lab): Has the Minister considered the position of a local regional musical instrument, the Northumbrian pipes, which are peculiar to Northumbria and the surrounding area, including my constituency? A number of pipe-makers have expressed concern about how they can preserve and continue the tradition of Northumbrian piping, given the current provisions. Clearly there is the question of the percentage exemption, but there is concern that recently made pipes, which were made legitimately in accordance with the legislation at that time, might fall outside the limit.

The pipe-makers have submitted evidence. Has that evidence been considered, and are there any measures that could assist them? It is a great local tradition. I should say that the Northumbrian Pipers' Society has made it absolutely clear that it does not wish to do anything that would undermine a ban on the sale of ivory or disrupt the legislation. Its members told me that they reuse ivory from things such as old billiard balls. That was perfectly legitimate when the pipes were made. I just wondered whether any consideration had been given to that.

**Alex Sobel** (Leeds North West) (Lab/Co-op): It has caught my eye that the definition of musical instruments includes plectrums, which are obviously widely used, particularly by professional musicians, to play guitars. A plectrum is a very small item, and there is quite a strong trade in mammoth ivory guitar picks or plectrums. One website that sells them says:

"Due to the density of the material, Mammoth Ivory picks produce a nice, bright, strong tone without the harshness of metal picks, especially on acoustic guitars."

We heard from the Musicians' Union that musicians spend their entire careers gathering such instruments, including plectrums, and then sell them upon retirement. It is not a profession that comes with a pension, so that is part of their livelihood. The Bill indicates that the volume of ivory in the instrument needs to be less than 20%. I would like some clarity from the Minister regarding whether that would include plectrums. Mammoth ivory plectrums are entirely made of ivory. Would the trade in mammoth ivory tusks—obviously, mammoths became extinct more than 10,000 years ago—completely vanish or would the effect be that people would have to sell plectrums with guitars? The plectrum could form part of the guitar, and then the volume of ivory would be less than 20%. Sometimes legislation can have unintended consequences. I am interested in that particular one.

**Anna Turley (Redcar) (Lab/Co-op):** I echo my colleagues' comments about how important it is that we get the clause right. Musicians' livelihoods can often be insecure and short term. Often they rely on their instruments to carry out their trade, business and livelihood. Also, in the long term, those instruments are often their pensions and investments. They are tools of the trade. It is vital that we get this absolutely right for a crucial industry.

We had a long discussion this morning about museums and the qualifying bodies that give advice to the Secretary of State, and that will be able to undertake the registers. I fear there is a bit of a gap. If a musician, who is not an expert in ivory, has a number of guitars or plectrums in their bedroom and they are concerned that they are made of ivory, to whom do they go to ask whether an item is covered? As colleagues have said, we do not want to catch people who have no intention of breaking the law but who are unaware of it. Is there somewhere people can go for advice pre-emptively to ensure they are not falling foul of this new law?

**David Rutley:** Hon. Members have raised some very interesting points, some of which I had not anticipated. They were good none the less. We are up for the challenge this afternoon.

On the very good question about broader education, it is clear that lessons were learned from the listing of rosewood last year about how to communicate effectively with the industry, and how the application of restrictions can be brought into force more effectively. As a result of that, DEFRA is working to ensure that we have better contact with the musical instrument industry through a number of different forums, such as the quarterly CITES stakeholder liaison meetings. Clearly, we need to build on that in our preparations for moving forward with the Bill once it has received Royal Assent. We are planning a programme of awareness-raising, aimed at working with the relevant sectors that will be affected by the ban. The new regulator—the office of public safety and standards—will have a job of work to do to raise awareness and work through compliance issues. It will need to set out clearly what the provisions are and how to comply with them. Steps will be taken to address those issues.

The hon. Member for Bristol East made an interesting observation about certificates and registration. Unlike registration, the certificate will be valid for only a single change of ownership. Registration is very different from the certificate. That will mean that the compliance

arrangements will be a lot clearer, because the person will have to re-register for each transaction. That is different from the “rare and most important” category.

**Kerry McCarthy:** This is really about clause 11, but I do not understand why a new owner has to re-register. That does not seem to make sense. In the same way as a registration certificate is attached to a car, why cannot one be attached to a musical instrument? We have expressed concerns about people not knowing that they have got to go through this process, and it seems that this has created an awful lot more work.

**David Rutley:** We can have that debate when we get to that clause. We are trying to ensure that we have a robust system, and that there is not too heavy a burden on the Government. We want our approach to be light-touch but effective. We can debate that more, and I am sure we will.

The hon. Lady asked some very interesting questions about items going abroad for repair. I did not know that happened. The exemption applies to UK imports and exports, so if the item satisfies the exemption in the UK, it will be allowed to be re-imported under the musical instruments exemption. To reiterate, the item must be registered under clause 10, and the person must apply for the relevant permit certificate under the EU wildlife trade regulations. The Bill builds on the EU wildlife trade regulations, so both need to be satisfied.

Questions were asked about Northumbrian pipes. It is a great part of the world, and I know that is a strong tradition in the constituency of the hon. Member for Blaydon. We are trying to create very tight exemptions, and if a Northumbrian pipe contains more than 20% ivory, it will not qualify for the exemption. That is a challenge. The point we made on Second Reading is that the item can still be played, owned, gifted, donated or bequeathed. We might be able to look at options to keep that tradition alive, but I am afraid Northumbrian pipes would not come under one of these exemptions, and it would be very difficult to have a specific one for just one category. There might be other ways in which that tradition can be kept alive for future generations.

2.30 pm

The hon. Member for Leeds North West made a point about plectrums and other accessories. They will need to be less than 20% ivory to qualify for the exemption. However, mammoth ivory does not fall within the scope of the Bill—I am sure that we will have a long debate about that when we debate clause 35—so a mammoth ivory plectrum would be unaffected.

**Mrs Pauline Latham (Mid Derbyshire) (Con):** Plectrums are surely independent from the musical instrument; they are something that somebody chooses to use. If they are 100% either mammoth or elephant ivory, they will not be able to be sold. It is highly unlikely that any musician will rely on selling those in order to fund his or her retirement, because they are such small parts. I would have thought that that is a bit of an irrelevance. I do not know if the Minister agrees.

**David Rutley:** In the scheme of what we are debating, it certainly is a small item. However, for those involved, it may be significant. My hon. Friend is absolutely right: if it is made of elephant ivory, it does not comply.

[David Rutley]

However—we will debate mammoths at length when we debate clause 35, I am sure—mammoth ivory is not in the scope of the Bill as it stands, and therefore a plectrum will not be affected if it is made of mammoth ivory.

**Sue Hayman:** I will ask the Minister for a couple of clarifications; these may be covered in the Bill, but I am flicking backwards and forwards. First, the Minister mentioned the new regulator when talking about education and information. Are the Government saying that the new regulator will have a duty to educate and inform the affected industries? Just so I am clear, how will it work with the Department? If the Government have not decided, that is fine; I just want to know where we are.

Secondly, although this may well be covered in the Bill, I want to return to the point raised by my hon. Friend the Member for Bristol East about certifications when going abroad for repairs. If someone has sent an instrument abroad for repair, not having realised that they should have registered it—which is obviously one concern of the Musicians' Union—and is told that they cannot bring the instrument back into the country, will there be a method whereby they can apply for that certification in order to bring that instrument over? I am just trying to get clarity, so that I know exactly where we are on those particular issues.

**David Rutley:** The OPSS will have a role in driving awareness. However, we clearly need to work through how it will carry out that task. Lessons will need to be learned from the rosewood example and other situations.

It is exciting that people generally are clearly learning very quickly about plastics, and we need to capture some of that enthusiasm in the same way on ivory. I think that will be quite straightforward for some people, but for those who are unaware that their item has any ivory in at all, more work will need to be done. That is what the OPSS will do. The exact detail of that will be drawn up with the action plans. The decision that the OPSS will be the regulator is very recent, so there is clearly a lot more work to be done on that point. On the point about people not being aware of an item's containing ivory, I will write to the hon. Lady to provide some clarity.

*Question put and agreed to.*

*Clause 8 accordingly ordered to stand part of the Bill.*

### Clause 9

#### ACQUISITIONS BY QUALIFYING MUSEUMS

**Sue Hayman:** I beg to move amendment 6, in clause 9, page 5, line 31, leave out from “that” to end of line 33.

*This amendment would only permit acquisitions by qualifying museums to be exempt if the item is also registered under section 10, in all circumstances.*

We tabled the amendment because we felt that clause 9(2)(a), which relates to acquisitions by qualifying museums, was also covered under clause 10 in all circumstances. The issue is whether paragraph (a) is strictly necessary. Surely all ivory items will be registered under clause 10, if they are held by a qualifying museum. I am just trying to join up clauses 9 and 10 logically, but I may have

missed the reason why the provision is in the Bill. We would like clarification of what otherwise seems to be unnecessary confusion. Will the Minister enlighten us?

**David Rutley:** I thank the hon. Lady for her careful consideration of the issue. I understand her desire to ensure tight control over exemptions. The intention of the clause is to provide for an exemption to the prohibition on dealings in ivory to and between qualifying museums. There is a strong argument for allowing the exemption on the grounds of national and international cultural exchange of heritage.

There is some doubt as to whether the amendment would achieve its stated intention. Were it to be accepted, the effect would be for qualifying museums to have to register items of ivory in every circumstance and to deal only in items meeting one of the other exemptions. The amendment would in effect remove the museum exemption. That is neither our intention, nor what we have set out publicly.

We should bear in mind that a qualifying museum is one accredited by either the Arts Council England, the Welsh Government, Museums Galleries Scotland or the Northern Ireland Museums Council. For museums elsewhere, they must be a member organisation of the International Council of Museums. Accreditation by those bodies requires adherence to high standards of governance and financial management and, as we heard in evidence, high ethical standards.

To require registration by qualifying museums in all circumstances would undermine the reasons for providing qualifying museums with an exemption and be a disproportionate burden, particularly as we do not believe the exemption is likely to contribute to continuing poaching of elephants. We intend, however, that a person seeking to sell an item to an accredited museum will be required to register it. The purchasing museum will be required to confirm its purchase.

With that explanation, I ask the hon. Lady to withdraw her amendment.

**Sue Hayman:** I am not entirely sure what kinds of items are covered. Surely any exempted item is covered by clause 10. I am trying to understand what items we are considering.

**David Rutley:** I understand the hon. Lady's point. We are trying to be very narrow in our approach. An example that might be useful—it certainly helped me to understand this case—is a museum that wanted to have a household object for a display on social history. The item has direct relevance to a period of time in a social history exhibition, so it would not qualify under the other exemptions we have discussed, if it is more modern, but it would still be directly relevant to the museum's exhibition.

**Sue Hayman:** I thank the Minister for that extremely helpful explanation. Basically, he is talking about items that would not come under the exemptions because they are not the rarest and most sought after, but are important items in the context of an exhibition. That would be allowed to take place only within the confines of a museum; it could not take place universally.

**David Rutley:** Let me give another example to make it come alive a bit more. We heard from the Victoria and Albert Museum that a post-1918 item made wholly of ivory, such as an art deco item, which would not be exempt elsewhere, might be relevant for a particular display, in terms of culture and heritage. Of course, that would have to take place in line with the museum's very strict acquisition processes.

Without seeking to become an expert in how museums acquire these things, I think that it was clear from our evidence session that they have very strict approaches, which would still be in place. This is a discreet exemption for museums because they are held to higher standards. They are regulated in a different way, and are subject to restrictions that do not apply to other holders and owners of ivory. We need to make sure that there are regulation processes outwith museums, but museums are required to work at very high standards.

Because there might be some items that sit outwith the exemptions we have broadly agreed upon, we want to continue to have the exemption for museums. There is a danger that the wording of the amendment would nullify the museums category. I hope that the hon. Lady will see that it would be wise to withdraw the amendment. We can discuss the matter more outside the Committee if that is required.

**Sue Hayman:** I thank the Minister for that explanation. We are all aware that this is a complex Bill, and the exemptions are even more complex. It is important that we get this right and that there is a proper understanding of the purpose of each clause. I fully understand that explanation, so I beg to ask leave to withdraw the amendment.

*Amendment, by leave, withdrawn.*

*Clause 9 ordered to stand part of the Bill.*

## Clause 10

### REGISTRATION

*Amendment proposed:* 7, in clause 10, page 6, line 34, at end insert—

'(1A) In the case an exemption under section 7 or 8, an item only satisfies the relevant exemption conditions if the volume of ivory in the item relative to the total volume of the material of which the item is made has been calculated in accordance with a method provided in guidance by the Secretary of State.'—(*Sue Hayman.*)

*This amendment requires a person registered an pre-1947 item with less than 10% ivory content, or a pre-1975 musical instrument with less than 20% ivory content, to calculate the ivory content according to a method set by the Secretary of State in guidance.*

**The Chair:** With this it will be convenient to discuss the following:

Clause stand part.

New clause 4—*Record of item provenance*—

'(1) The Secretary of State shall make arrangements for persons—

- (a) applying for an exemption certificate under section 3, or
- (b) registering an item under section 10 to be able to associate the item to which the application or registration relates with previous registrations or previously issued exemption certificates.

(2) Where an exemption certificate is issued in respect of an item, or where an item has been previously registered, and the Secretary of State is satisfied that the item has previously been registered or had exemption certificates issued in respect of it, the exemption certificate or registration shall record all previous exemption certificates issued or registrations made in respect of that item, including the dates on which any certificates were issued or registrations made.'

*This new clause allows for exemption certificates or registrations to record all previous exemption certificates or registrations issued for that item, in order to establish a record of each item's ownership and provenance.*

**David Rutley:** The purpose of clause 10 is to provide the compliance regime that must be followed by the owner of an ivory item prior to carrying out a dealing that falls under any of the exemptions provided for in clauses 6 to 9. The subsections set out the registration process to be carried out on a Government website, although alternative telephone and postal methods will be provided for those who are unable to use an online system.

To register an item as exempt, the owner or a person acting on behalf of the owner must provide: their name and address; a description and a photograph of the item, including any distinguishing features; and a declaration that the item satisfies the conditions of one of the exemptions for musical instruments, de minimis items, portrait miniatures, and objects that an accredited museum has confirmed its intention to purchase or hire.

**Simon Hoare** (North Dorset) (Con): Subsection (1)(a) refers to the registering of the owner's name and address. With regard to the personal safety and security of the owner—because we know that there are some fanatics out there who will go to any lengths—and protection from theft and burglary, will the Minister confirm my understanding that names and addresses on the register are not available to the public? Can he also confirm whether it would be covered by the Freedom of Information Act?

2.45 pm

**David Rutley:** I assure my hon. Friend that the individuals' names will not be publicly available. This is purely to enable the registration process to move forward, and for the regulator and enforcement agencies to have sight of who registered the item. That information will not be made available.

**Simon Hoare:** I am pleased to hear that confirmed. What the Minister proposes is the right approach. The freedom of information request could be a thieves' "Yellow Pages", even if the information were to be redacted in some way. I appreciate that this is a legal question and I am not necessarily expecting an answer now, but during the course of the debate, could the Minister confirm whether, as far as the Secretary of State is concerned, that register is FOI-able? That might be helpful.

**David Rutley:** Once again, with forensic skill and deep analysis of what is going on, my hon. Friend makes another important point about freedom of information and its potential dangers for individuals. I

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reassure him that freedom of information protects private information, so he does not need to worry about that issue.

**Simon Hoare:** The register will be maintained by the Secretary of State in his public capacity, not his personal or private capacity. I do not want to dance on the head of a pin, but can the Minister confirm that while it is a state-held register, held by the Secretary of State, it is absolutely not FOI-able?

**David Rutley:** My hon. Friend raises quite a technical point. If he does not mind, I will write to him to provide that detail.

**Simon Hoare:** I am most grateful.

**David Rutley:** Returning to the clause, registration will require an explanation of any planned commercial activity for the item. We recognise that there might be occasions when an item is registered for non-commercial reasons, such as to satisfy insurance requirements. Subsection (1)(f) provides for the Secretary of State to specify, in guidance, any other areas of information that must be provided.

Subsection (1)(g) allows the Secretary of State to issue regulations that will prescribe a fee payable by those registering an item for commercial dealing, such as sale. The fee will be in line with the Government's principle of cost recovery, as we talked about earlier, to reflect the cost of establishing the registration scheme, including the new IT system.

We also intend the registration scheme to apply to those who wish to import into the UK items bought abroad that meet one of the categories of exemption. Again, we have talked about some of those, such as the musical instrument exemption. By registering the item, the owner will confirm that, to their understanding, the item qualifies under the relevant exemption. This registration must take place prior to the dealing of that item. The system will be administered by the Animal and Plant Health Agency.

In submitting the required information to register an item, the owner will in effect be making a declaration that the item is as they have described. Subject to the requirements of the registration process being fulfilled, confirmation of the registration of the ivory item will be issued, which will permit the owner to engage in dealing with that specific item. Should it transpire, as a result of either a check of the system by the Secretary of State or compliance and enforcement activity by the regulator or police, that the information does not match the item in question, the owner may be liable to prosecution.

I thank the hon. Member for Workington for tabling new clause 4. I think we all agree that we need to make the process as transparent and open as possible. As we discussed in relation to new clause 1, the Government intend to publish the number of exemption certificates issued. I appreciate the intention behind the new clause, which is that the Government should be able to build up a clear picture of the movement of items exempted under clause 2 as they are bought and sold, and of items registered for exemption under clause 10. I should clarify

that an exemption certificate will be associated not with a person, but with the relevant item—we touched on that earlier in the debate. A registration, on the other hand, will be valid for only one commercial dealing resulting in a change of ownership—that is, a sale. Once an item has changed hands, the registration expires.

We need to ensure the right to privacy of owners and sellers, in line with the Data Protection Act 2018. We therefore doubt whether it would be permissible to list a current or previous owner's name on either exemption certificates or registration certificates, as they might be displayed publicly by the seller, or by someone acting on behalf of the seller. In the case of exemption certificates, they will also be required to be passed on to the purchaser.

We are looking at the possibility of publishing data annually on the types of items exempted under each category—for instance, how many pianos are registered under the musical instruments category. Again, the publication of any further detail will have to be considered in line with the Data Protection Act, in order to ensure the right to privacy of owners and sellers. We talked about some of these tensions in the earlier debate.

In addition, law enforcement agencies and the regulatory authority will have access to the database for registration, so they will be aware if previous applications have been made in respect of an exemption certificate under clause 3 or a registration under clause 10.

**Sue Hayman:** In amendment 7 we are looking at an item that has been exempted under clause 7 or clause 8. The item would then only satisfy the relevant exemption conditions,

“if the volume of ivory in the item relative to the total volume of the material of which the item is made has been calculated in accordance with a method provided in guidance by the Secretary of State.”

The amendment requires anyone registering a

“pre-1947 item with less than 10% ivory...or a pre-1975 musical instrument with less than 20%”,

to calculate the ivory to a set, prescribed methodology.

We looked at tabling this amendment following the oral evidence we took on Tuesday from the Chairman of the British Art Market Federation. I asked a question about volume and measurement and how that would work, and his concern was that there could be discrepancies in the way that volume was measured. There was a clear appreciation of the fact that measuring by volume is the right way to move forward; it is much more practical than measuring by weight. If we are going to measure by volume, it would be helpful to have a clear and consistent method of calculation so that nobody accidentally falls into criminality because they use a system of measurement that is not recognised by the Secretary of State. We just seek to provide clarity to the music and art world, and to museums, that, “This is the prescribed method, and we expect you to use this system if you are to get your certification.”

**David Rutley:** I thank the hon. Lady for the amendment, but I believe that it would add an unnecessary and disproportionate requirement to the registration process. The clause establishes the compliance regime that must be followed by the owner of an ivory item who wishes to deal in that item under any one of the exemptions. The registration process already requires a description of

the item and a photograph to confirm the distinguishing features. From responses to the consultation, we understand that the majority of commonly played and traded musical instruments and accessories, such as pianos and violin bows, are less than 20% ivory. We also believe from the evidence we have received that it is reasonably easy to assess with the naked eye whether an item is 10% or less ivory by volume. Indeed, we believe that it is easier to assess against a 10% threshold than, for instance, a 30% threshold.

Anyone who registers an ivory item will have confirmed to the best of their knowledge that the item in question meets the relevant category of exemption, and will have submitted information or evidence about it—photographs, for example. Spot checks will be carried out on registered items by enforcement and compliance officers to confirm that they are exempt from our ban. If an item is being used commercially, regulators or the police may check to confirm that it is registered and compliant, and may take appropriate action if necessary. Given that explanation, I ask the hon. Lady to withdraw her amendment.

**Alex Sobel:** In the US, President Obama introduced a ruling similar to the one we seek to make. The United States Grammy organisation, which has a role similar to that of the British Phonographic Industry in the UK, has published useful guidelines. The US Fish and Wildlife Service supports musicians with looking at the ivory content of their instruments, because there is a similar 10% *de minimis* rule in the US. The guidelines mention bagpipes, which I am sure my hon. Friend the Member for Blaydon is interested in, and keyboards. There is also a 200-gram limit. Bagpipes, keyboards and pianos are the sorts of items for which there is difficulty working out whether they meet the criteria. Will the Minister look at that good practice in the US?

**David Rutley:** I thank the hon. Gentleman. He is clearly seeking to find ways to assist with getting judgments right in what can be quite difficult circumstances. I think it is fair to say that, from the evidence we heard and certainly from the submissions to the consultation, the enforcement agencies believe that this is a proportionate approach, and that it would be much more difficult if gram weight, for example, were used. The volume basis is a much better way to move things forward.

It is difficult to specify a method that fits all items well. The hon. Gentleman is obviously more of an expert on the US system than I am—I cannot even pronounce the name of the agency he referred to. It was refreshing and encouraging to hear in evidence that the 20% threshold will work for the vast majority of musical instruments, and that the enforcement agencies feel comfortable that that is a way to take the process forward—notwithstanding the unique issues with Northumbrian pipes, which we will talk about separately.

**Liz Twist:** I thank the Minister for pre-empting my comment. Northumbrian pipes are very distinct from bagpipes—they are a very specific regional variation. The question of estimating the volume of ivory is important and the amendment seeks to address how that can be calculated.

3 pm

**Anna Turley:** I rise to speak to new clause 4. I want to express my concern about resources. What we heard in evidence this week gave me serious cause for concern. I

was shocked that the CITES Border Force team at Heathrow has only 10 people and that the National Wildlife Crime Unit has only 12 people, given the existing scale of the problem, which I think was 1,000 seizures per year. They will have an awful lot of work to do when the Bill is in force.

This is not the place to make political points, but resources are critical to the Bill's success and we all know the pressures there have been on police budgets in the current climate. It is therefore imperative that the relevant bodies have the resources they need to enforce this law, for it to have any value whatsoever.

**Sue Hayman:** New clause 4 would establish a record of any item's provenance. Items to be exempted are, as we know, the most rare and most important of their kind. When such important items are sold, whether privately, individually or through an auction house for museums or galleries, their provenance would tend to move with them so that the purchaser has confidence that the item is genuine and knows who bought it before and where it has been stored or exhibited.

The idea is for the Secretary of State to make arrangements so that persons applying for an exemption certificate under clause 3 or registering an item under clause 10 could associate the item to which the application or registration relates with previous registrations or exemption certificates. Where an exemption certificate has previously been issued in respect of an item or an item has been previously registered and the Secretary of State is satisfied that that is the case, the exemption certificate would also record previous exemption certificates issued and registrations made in respect of that item. In particular, it would include relevant dates so that any certification or registration follows the item. The Minister has made it clear that registration is for the item, not the individual, so it makes sense for the history to move with the item as it goes through any future registrations or exemptions.

On Second Reading, the Secretary of State stressed the importance of ensuring that an item's provenance can be guaranteed, and that is what the new clause tries to achieve. It would provide security for future owners, who would have full details of an item's history in this area, as is normal for many items sold or within the art world. It would also helpfully flag up any replacement certification. It may also be helpful in trying to counteract any fraudulent behaviour regarding multiple replacement certificates. If those previous certifications followed the item, it would be very clear if there was a particular item for which a number of replacement certificates were being requested. I ask the Minister to consider the value the new clause could bring to future owners of the items we are talking about.

**David Rutley:** There are a few items. We are going in a slightly different order, but we are going with it, in the spirit of the Bill. We are getting through it and I appreciate the co-operation.

**Sue Hayman:** We have to be nimble.

**David Rutley:** We are. We are fleet of foot, that is for sure. Some of the questions are quite interesting.

As we are talking about lots of different issues at this point, I want to go back to the comments from the hon. Member for Leeds North West, to bring it together. The

[David Rutley]

musicians sector has said that it is broadly happy with the 20% exemption. Particularly for pianos, the vast majority are definitely going to fall within that exemption, so that will be fine. The US has a different arrangement, but our enforcement bodies were very clear that they did not want a weight measure. It just made it more difficult. Just so we are all clear, the US body is called the US Fish and Wildlife Service—I thank my officials for that.

A very good point was raised about resources. Obviously, public finances are always under scrutiny and we need to make sure that they are being best used. The National Wildlife Crime Unit is jointly funded by the Home Office and DEFRA and will be funded up to 2020, and there are ongoing conversations about that. Future funding decisions about such bodies will be for the Home Office, and the Home Secretary has said he is working on those matters. We should also not forget that we have the regulator involved.

**Alex Sobel:** The US Fish and Wildlife Service's Office of Law Enforcement is similar to our National Wildlife Crime Unit. I discovered that it has eight regional offices and a national office, and 383 staff to undertake the same work as our 12 staff in the National Wildlife Crime Unit. Obviously the US is a much bigger country with a population of 300 million, but the resources are way in excess of those available to us to do this role. We should look at the stark difference between us and the US.

**David Rutley:** We will seek to learn lessons from them. We are getting a regulator and a new system in place here. It was very clear that the witness who we had in front of us from the National Wildlife Crime Unit was a very committed individual. We need to figure out how we can best move this forward. In the spirit of this free-flowing Committee, let us get on with it. We will learn as we go a bit here. I am sure there will be further challenges and further learning as we move things further forward.

On new clause 4, as I said in my speech, we do not believe that there is any need for further information on provenance regarding the registration process, as clause 10(1)(b) requires a description of the item and its distinguishing features, which will include details on its provenance and age. That is available in the registration process.

**Dr Lisa Cameron** (East Kilbride, Strathaven and Lesmahagow) (SNP): It is extremely important, given the evidence that we heard from the National Wildlife Crime Unit, that resourcing follows the Bill. I would like reassurances from the Minister in that regard. We heard clear evidence that its current shelf life, so to speak, is only to 2020—it is only resourced up until 2020. It is extremely important for long-term planning that that is extended. That is quite timeous, actually, because it is not only about long-term planning, but also holding on to staff with great expertise in the field. The last thing that any of us working together on the Bill would want is not to be able to enforce its provisions.

**David Rutley:** The hon. Lady makes an important point. Obviously, the resources will be important. We know that they are in place until 2020. We also know

that we are making an important statement with this Bill in tackling the trade in ivory. We need to make sure that the resources and the systems are in place. We have had questions today about how we can improve and enhance the system, so there is a lot of work that we need to do. I am not trying to suggest that resources are not important. I simply think that they are one part of a package that we are moving forward on.

**The Chair:** If I can ask Ms Hayman to be quite nimble, I will take her back to amendment 7. Does she want to press it to a vote or is she seeking to withdraw it?

**Sue Hayman:** I will just think about that.

**David Rutley:** While the hon. Lady thinks about it, perhaps I can explain that although our approach will require resources, it will also require online tools so that we can have a proper registration and certification process in place. I do not know whether that has given the hon. Lady enough time to revisit the amendment.

**Sue Hayman:** Yes, it has—I thank the Minister for his support on that. On the total volume, as long as the guidance that is provided to support the Bill once it has become law is clear about support for individuals who are assessing the volume of their items, and that any accidental criminality, owing to people falling on the wrong side slightly of the volume calculation, is avoided, I will withdraw the amendment. The guidance needs to be clear about the implications and the best way to find help and support. We are talking about musical instruments: people might not have any idea how to calculate this, so there needs to be proper access to people who can. It is important that that information is easily available so that people do not accidentally fall on the wrong side of the law. If the Minister can give me that reassurance, I will be happy to withdraw the amendment.

**David Rutley:** Yes, I can reassure the hon. Lady that proper guidance will be available. The enforcement agencies that we spoke to during the evidence sessions were committed to the volume-based approaches, and they seem able to move on. They did not query it when we met, so I can give her those assurances.

**Sue Hayman:** I beg to ask leave to withdraw the amendment.

*Amendment, by leave, withdrawn.*

*Clause 10 ordered to stand part of the Bill.*

## Clause 11

### FURTHER PROVISION ABOUT REGISTRATION

*Question proposed,* That the clause stand part of the Bill.

**David Rutley:** The clause is largely technical; it provides further information on the registration process and ensures that the Secretary of State has the necessary levers to ensure that the process works effectively and is not open to abuse or misuse. Subsection (1) ensures that the registration of an item would cease to be valid as

soon as its owner changes. Unlike the exemption certificate issued for items under the rarest and most important category, registration allows the current owner either to sell their item or to engage in other forms of dealing that do not result in change of ownership, such as hiring the item. The registration is therefore associated with the individual and is valid for a single change of ownership. It is different from certification.

The owner must register an item in order to carry out dealings but does not need to register an item each time a commercial dealing is undertaken, as long as the owner does not change. For example, if the owner wishes to hire the item multiple times, they complete a single registration for the item to be subject to hire. If the owner changes, however, the registration becomes invalid and the item must be registered by the new owner before they can carry out any dealing. This applies to individuals and organisations.

Subsection (2) sets out that once the owner registers an item under clause 10, they have a responsibility to ensure that the information recorded in the registration process remains complete and accurate. As such, if the owner becomes aware that information included in the application is inaccurate or incomplete, or if any information becomes invalid or changes, they must notify the Secretary of State and provide the required information to address the issue. That could be, for example, because the item is damaged or otherwise altered at some time after registration but before dealing, or if the owner, having completed the registration process, subsequently becomes aware of some fact that might invalidate the registration. If an owner were found to be in possession of such information and had not informed the Secretary of State, they could be found to be in breach of the provision.

3.15 pm

Subsection (3) allows the Secretary of State to cancel exemption registration, meaning that dealing in the item concerned would be prohibited. This is where the Secretary of State believes that the registered item does not meet the exemption conditions declared by the owner, considers the registration to be void because the owner of the item has changed since registration, or is of the view that the owner has failed to notify them in order to address any incomplete or inaccurate information relevant to the registration. The Secretary of State may become aware of any of those reasons as a result of compliance and enforcement activity undertaken by the Secretary of State, the regulator or the police. Such activity could include spot checks of the registration database or checks on goods subject to commercial dealing—for example, sale in shops, auction houses or online sales websites.

Subsection (4) allows the Secretary of State to add or alter information on the registration if the registration information is or becomes inaccurate or incomplete. That will be applied primarily when the owner has notified the Secretary of State of a change in information.

Subsection (5) allows the Secretary of State to ask applicants when registering an item, or once registration is complete, to provide information in a specific form or manner, as outlined in guidance. For example, that could ensure that an owner who does not complete the online registration process correctly in the first instance is given the chance to do so correctly, rather than the registration being rejected.

Subsection (6) clarifies the meaning of terms used in the clause, including with reference to other clauses in the Bill.

**Sue Hayman:** I thank the Minister and congratulate him on getting through that. I find this clause complex. I worry that existing and future owners might get confused about what is expected of them and when it is expected. Again, clear guidance will be incredibly important. The explanatory notes state:

“If a new owner wishes to carry out dealings in that ivory item, they must make a fresh registration”—

but a fresh registration from what? Is that fresh from the exemption certificate or an existing registration? I find that slightly confusing.

**David Rutley:** In the interests of clarification, it is important to note that certificates are required for the rarest and most important items. The certificate is in a way a passport that goes along with the items, because they are particularly rare, important and often valuable. The certificate acts a bit like a passport, moving on with the item.

The other categories are covered by the registration process. Notwithstanding the fact that I have learned through this process that some musicians have valuable items, often such items are not that valuable. In this approach, therefore, we have a registration process that is more simple and straightforward, with lower cost—this is about cost recovery from applying through an online system. Applying for a certificate will be a more costly approach, because of what we talked about this morning—where the Secretary of State is required to get advice from another body. The idea is that certificates are for the rare and most important items, and a more simple, low-cost registration approach is for all the other exemptions that we have discussed so far. I hope that clarifies matters.

**Sue Hayman:** Yes, it does. I am thinking about the comparison with car registration that my hon. Friend the Member for Bristol East used earlier. The language is complex, but it would be good if it were absolutely crystal clear where the responsibility lies, and when in respect of registering items. If that is not clear in the Bill, or if I have missed it, how can we make it obvious to any purchaser or seller so that people do not accidentally fall foul of the law?

**David Rutley:** I agree that the provision can sound complicated. I have tried to explain as best I can how it will move forward. The key thing is that registration is the lighter touch when compared with certification. People who have an item and want to ensure that everything is all right can use the registration system online, and there are telephone and postal arrangements for those who are not tech-savvy.

We need to ensure that we have a robust system and should remember that we are trying to stop the use of ivory. That is the balance we are trying to strike; we want something that is both robust and proportionate. Registration for those other categories is more proportionate but will enable us to ensure that the measures are properly complied with.

**Sue Hayman:** I thank the Minister for his response. I support the idea that the Bill needs to be robust—if it is not, we will not achieve the desired ends. Registration will affect many more people than the exemption certificates, so it is important that when the Bill becomes law there is an absolutely clear understanding of what is expected of people and the deadlines.

**David Rutley:** I thank the hon. Lady for those further points. The responsibility will be very much with the owner—we are putting the onus on the owner—which is why we need to ensure that the system is clear. We will be working hard to ensure that it is an easy-to-use and clear system. We now have several months in which to get the provisions in place. We need to get moving to Royal Assent, but then there will be a six-month period when we can get ready for when it is put into practice.

We are moving at pace and want more pace, but at the same time we need to ensure that the systems are right. We are working behind the scenes with officials and various other bodies to ensure that there is clear guidance and that the systems, once established—we are still developing them—are fit for purpose and easy to use.

*Question put and agreed to.*

*Clause 11 accordingly ordered to stand part of the Bill.*

*Ordered, That further consideration be now adjourned.*  
*—(Mims Davies.)*

3.24 pm

*Adjourned till Tuesday 19 June at twenty-five minutes past Nine o'clock.*

**Written evidence reported to the House**

IVB 07 Rosemary Bandini

IVB 08 Amir Mohtashemi Ltd

IVB 09 Sydney L Moss Ltd

IVB 10 Action for Elephants UK

IVB 11 This person wishes to remain anonymous

IVB 12 A law firm that wishes to remain anonymous

IVB 13 Martin P. Levy

