



Department
for Business
Innovation & Skills

**THE FUTURE OF THE ENEMY
PROPERTY PAYMENTS SCHEME
AND THE BALTIC STATES SCHEME**

Consultation Document

FEBRUARY 2015

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Future of the Enemy Property Payments Scheme and the Baltic States Scheme

This consultation is seeking views on the future of the Enemy Property Payment Scheme and Baltic States schemes.

Issued: **3 FEBRUARY 2015**

Respond by: **17 MARCH 2015 6 WEEKS AFTER ISSUE DATE**

Enquiries to: The EPCAP and Baltic State Schemes Consultation, Department of Business, Innovation and Skills, 1 Victoria Street, London, SW1H 0ET

This consultation is relevant to: Anyone who has an interest in the Enemy Property Payment Scheme and the Baltic State Scheme. Particularly those *residents (or their successors) of Britain's former enemies from the Second World War who had assets confiscated in the UK under the Trading with the Enemy Act 1939 during or immediately after the War and which has not been returned, and who had been victims of Nazi persecution (essential criteria of the EPCAP scheme).*

1. Foreword from the Secretary of State

The UK Government's Enemy Property Compensation Scheme and Baltic States Scheme were established in 1999. They sought to compensate residents of Britain's former enemies who had assets confiscated in the UK, under the Trading with the Enemy Act, but in fact had been victims of Nazi persecution or only had been considered 'enemies' on the basis that their countries were under occupation during the Second World War. Both compensation schemes are administered by an independent Enemy Property Compensation Advisory Panel (EPCAP), whose role is to consider and make decisions on these claims.

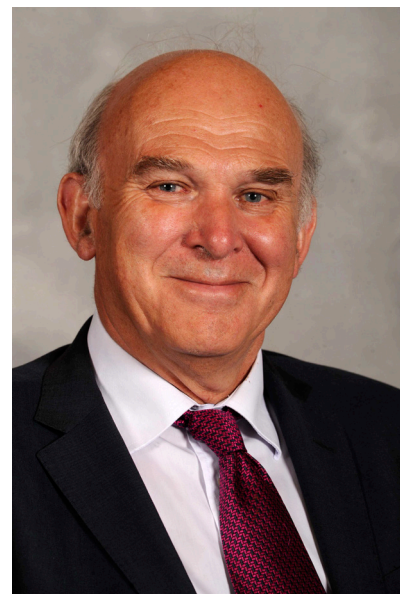
Since this time of its establishment, the EPCAP schemes have considered over 1,300 claims, paying out over £23 million to 510 successful claimants. We are right to be proud of the achievements of these schemes in ensuring that assets are returned to their rightful owners.

However, in recent years the scheme has experienced a marked decrease in the number of claims submitted. 950 of total claims were received in 1999, whilst 350 in the intervening years until the present day. In the last five years of the scheme, the Panel has received just 37 claims, 8 of which have been successful.

It is this decline in demand that has led my Department to seek formal consultation and review the future of the scheme.

It is important that all interested parties have their say on this sensitive and important issue and I look forward to receiving your responses.

Vince Cable
Business Secretary



2. How to respond

When responding please state whether you are responding as an individual or representing the views of an organisation. If you are responding on behalf of an organisation, please make it clear who the organisation represents by selecting the appropriate interest group on the consultation form and, where applicable, how the views of members were assembled.

A copy of the Consultation Response form is enclosed or available electronically at: <https://www.gov.uk/government/consultations/enemy-property-payments-and-baltic-states-schemes-review> (until the consultation closes). If you decide to respond this way, the form can be submitted by letter, fax or email to:

EPCAP and Baltic State Schemes Consultation
Department of Business, Innovation and Skills
1 Victoria Street
London
SW1H 0ET
Tel: 0207 215 8779
Email: janette.plumridge@bis.gsi.gov.uk

If you have any concerns about the way the consultation is being run please refer to the contact in Annex A.

3. Additional copies

You may make copies of this document without seeking permission.

An electronic version can be found at <https://www.gov.uk/government/consultations/enemy-property-payments-and-baltic-states-schemes-review>

Other versions of the document in Braille, other languages or audio-cassette are available on request.

We have identified a number of organisations and individuals whom may be interested in providing their thoughts to this consultation and have contacted these parties directly. A list of those organisations and individuals consulted is in Annex B. We would welcome suggestions of others who may wish to be involved in this consultation process.

4. Confidentiality & Data Protection

Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004). If you want information, including personal data that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will

take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

5. Help with queries

Questions about the policy issues raised in the document can be addressed to:

EPCAP and Baltic State Schemes Consultation
Department of Business, Innovation and Skills
1 Victoria Street
London
SW1H 0ET
Tel: 0207 215 8779
Email: janette.plumridge@bis.gsi.gov.uk

A copy of the Code of Practice on Consultation is in Annex A.

6. What happens next?

This consultation will last for 6 weeks, commencing from **3 February 2015** and concluding on **17 March 2015**. A Government Response to the consultation and announcement of the final decision will be published on the BIS website with paper copies of the summary of responses available on request within three months of the consultation closing date.

7. The Enemy Property Payments and Baltic States Schemes

History

Board of Trade Payments Scheme 1948-1957

From 3rd September 1939, the British Government froze all assets in British territory owned by residents of enemy countries during the Second World War under the Trading with the Enemy Act 1939 (TWE) to ensure they could not be used against the UK or its allies during the war. The enemy countries included the former Nazi Germany, its allies, Italy and Japan (belligerent enemies), and countries occupied by them (technical enemies).

After the war, in accordance with Peace Treaties (1946/7), the British Government released the assets of the occupied countries from government control but the assets of the belligerent countries were distributed to British creditors whose assets had been confiscated by the enemy countries. However, Government recognised the travesty and the long lasting impact the events of the Holocaust would have on victims of Nazi Persecution and subsequently made the exception that victims of Nazi persecution, who had their assets seized under the TWE, could claim the return of their assets through an ex-gratia scheme ran by the Board of Trade from 1948 to 1957.

Under the scheme, the burden of proof was heavily on the victim to demonstrate that they had been “deprived of liberty (freedom)”. The Board of Trade decided it was not sufficient for victims to have been incarcerated in a labour camp or moved to a ghetto. Claimants had to have left their home countries and heirs could only claim if their relative died during the war (1939-1945), though this was later extended to 1947. Heirs who made a claim were required to show witness to the death in the form of affidavits or death certificates, which they were not likely to be in possession of if the victim died in a concentration camp. The relatives of those who had committed suicide as a result of Nazi persecution were not eligible for payment. Victims were repaid the value of the asset less a 2% administration charge and no interest was paid.

By 1958, of over 1,000 claims, 84% of applicants were successful and were paid a total of £2 million in compensation. In addition, £250,000 of liquidated assets was used to establish an independent compensation scheme, the Nazi Victims Relief Trust, which paid compensation to religious and political victims of Nazi persecution until 1961.

Baltic States Scheme

The Baltic States scheme was launched in the 1969 following a statement in the House of Lords and is run on a similar premise to the Enemy Property Payments scheme. The Baltic States scheme does not require claimants to have been victims of Nazi persecution as an essential criterion. If the original owner of the asset was a victim of Nazi persecution, the claimant can claim through the Enemy Property Payments scheme.

The Enemy Property Compensation Advisory Panel

During the mid-1990s, there was a considerable increase in public concern that there were still many assets belonging to victims that had not been returned. This was largely due to the collapse of the Soviet Union which increased the availability of archived material in Russia and Eastern Europe.

The then Government acknowledged and responded to these concerns and apologised to victims of Nazi persecution and to their relatives and descendants as those who dealt with claims following the war were 'sometimes insensitive' to the plight of Nazi victims¹.

In 1997, the British Government published research on the history of the administration of Enemy Property which generated a database of over 30,000 records seized from residents of belligerent and technical enemy countries². This website allows heirs to search for their relative's assets and value of such asset at the time of confiscation, by surname and/or address.

However, at this point the original scheme had been closed for over 40 years and, in line with the Public Records Act 1958³, many documents relating to property seized under the TWE and subsequent claims for compensation were destroyed. Consequently, it is difficult to determine rightful ownership of assets seized, whether the assets had been repaid under the previous schemes and which assets belonged to people who were not victims of Nazi persecution.

Launch of the Panel

In December 1998, the then Secretary of State the Department for Trade and Industry announced a compensation scheme called the Enemy Property Payments Scheme. The compensation scheme would be administered by an independent Enemy Property Compensation Advisory Panel (EPCAP) whose role was to consider and make decisions on claims under both the Enemy Property Payment Scheme and the Baltic States Schemes. The panel are made up of four assessors comprised of a deputy chairperson, one legally qualified panel member, an assessor with financial expertise and someone representing an ethnic minority group.

The then Government also recognised the difficulties of the first compensation scheme for victims to claim; under the Enemy Property Payments scheme heirs could claim regardless of when their relative died, payments were increased by the Retail Price Index and an administration fee was not charged. Significantly, the criteria for eligibility was: *'the person who was the owner of the property at the time it was confiscated... or the claimant, suffered Nazi Persecution, either through discriminatory legislation or action in pursuance of de facto state policy taken by the relevant enemy state'*.

EPCAP launched the Enemy Property Payments Scheme in April 1999 to under the Chairmanship of Lord Archer of Sandwell. In addition, a separate adjudicator was established, to hear appeals against EPCAP's decisions.

The Enemy Property Payments Scheme was originally intended to run until the end of September 1999, on the expectation that the scheme would receive only c200 claims. However a total 947 claims were received in 1999 alone, of which some 388 of these claims were successful, leading to compensation payments in totalling more than £18 million. Based on the higher level of demand than expected, the scheme has continued indefinitely.

To date EPCAP have considered over 1,300 applications for compensation for almost 1,500 assets with over 500 claims having been assessed as qualifying for payment. Since the scheme

¹ Enemy Property Press Release, 3rd April 1998, Margaret Beckett (President of the Board of Trade)

² This can be found at <http://www.enemyproperty.bis.gov.uk>

³ Under the Public Records Act 1958 (section 3); documents cannot be held for more than 30 years without the appropriate authority (this was amended to 20 years in July 2013)

was launched in 1999, a total of £23.7 million has been paid and the average payout is around £46,000. Claims have been submitted from countries worldwide and oral hearings have been convened for those cases that proved difficult to resolve.

The Claim Process

Claims are submitted via the Enemy Property Payment Scheme form to the secretariat which is then checked to ensure the data and documents are valid and meet the eligibility criteria to make a claim.

The panel then makes an assessment of the claim during a panel meeting. At this stage, the panel may request more information from the claimant to support their claim. Under the Enemy Property Payments scheme, there is no distinction between Jewish or other groups persecuted by the Nazis⁴.

If the claim is successful, the compensation level paid is based on the original values increased by the change in RPI (for payments under the Enemy Property Payments Scheme) or the original stake/asset (for payments under the Baltic States scheme) is returned.

If a claim has been rejected, the claimant can decide to appeal within two months of the decision being made. All appeals are assessed by the appeals adjudicator who will then either overturn or ratify the claim.

This process is outlined in Annex C.

The Enemy Property Payments and Baltic States Schemes Today

The Enemy Property Payments and Baltic States Schemes were closed to new claims in August 2004, though in certain circumstances, if a good reason can be shown why a claim was not submitted earlier, it is possible to submit a late application. It is the responsibility of EPCAP to decide whether to accept a late claim into the scheme. The majority of similar schemes operated worldwide have now also closed.

Almost 90% of claims assessed were submitted between 1999 and 2001. Whilst the panel was dealing with hundreds of claims within the first few years of the scheme, this has now dramatically reduced. Over the last five years up until March 2014, EPCAP has received 37 claims of which 8 claims were successful (see Annex D for further details). The ongoing running costs of keeping the scheme open at its current level is around £65,000 per year, bringing into question relative value for money for the taxpayer.

On the other hand, we remain mindful that without definitive figures on the outstanding number of assets that have not yet been returned to their rightful owner, we cannot know with any certainty whether or not the scheme has truly run its course.

It is for these reasons the department have decided to review the EPCAP, Enemy Property Payments and the Baltic States schemes and gain views on the potential future of the schemes.

⁴ http://hansard.millbanksystems.com/lords/1998/jan/15/nazi-victims-assets#S5LV0584P0_19980115_HOL_46
(Nazi Victims: Assets. *HL Deb 15 January, Volume 584, cc1135-5, 3.21pm*)

8. Options

Option One

The first option is to keep the scheme open on its current basis as outlined in The Claims Process (Annex C & Section 7). The panel make decisions on claims from those who can prove they have a valid reason for not claiming prior to the schemes closure in August 2004.

Hearings are held on a quarterly basis and take place over two days; one day to assess the case notes and one day for the hearing. The panel members have one day per month to deal with any other business (AOB). The panel are paid a daily rate.

The EPCAP secretariat is employed on a full time basis and deals with enquires for potential claims, ensures submitted claim documentation meet the eligibility criteria and prepares claims in order for the panel to fairly review each claim.

Pros	Cons
Ensures that eligible applicants for the scheme will still be considered. In particular, it does not close off the ability to claim for those unaware the scheme is in existence.	Does not recognise the declining demand for the scheme. May not represent optimal value for money for the taxpayer.

Q1. What are your arguments on retention of the Enemy Property and Baltic States Scheme on its current basis?

Q2. Is the concept of value for money for the taxpayer a reasonable and valid argument to consider reducing the scope of the scheme?

Option Two

The second option is to scale back the panel meetings to twice or once a year to assess claims.

Under this option, the panel member's current allowances and the level of secretariat support will be revised accordingly. Further efficiencies in the administrative function of the scheme will also be considered.

This reduction in meetings would not limit the claimant's ability to submit a claim and the panel would have discretion to consider a claim earlier in exceptional circumstances.

Pros	Cons
Ensures that eligible applicants for the scheme will still be considered. Reduces the operations of the scheme to a level commensurate with public demand.	Under the current arrangement, it typically takes 6-9 months from the claim submission date to the decision date. EPCAP will consider claims as outlined in <i>The Claims Process</i> (Annex C) however a reduction in panel meetings could increase this timescale.

Q3. Is this option a reasonable and workable solution?

Q4. Are you aware of any additional pros or cons to this proposal?

Option Three

The third option we are asking you to consider is to close the scheme entirely.

Under this option, any decision to close the scheme would be widely communicated, coupled with a reasonable period of notice for any outstanding claimants to submit their applications.

Any claims submitted prior to the announced closure date will be accepted and assessed as outlined in The Claims Process (Annex C). Applications received after that point would not be considered.

Once all claims have been assessed and decisions have been made the panel would be disbanded. The appeals adjudicator will be released from his duties at least two months after this date to allow for any appeals to be assessed.

Pros	Cons
<p>Allows for the formal closure of a successful scheme twelve years later than originally intended.</p> <p>Communication of the closure of the scheme could prompt any outstanding applications to be made and raise awareness of the scheme to a new audience.</p>	<p>Risk that someone able to make a valid claim for the scheme may not be able to do so once the scheme has closed.</p>

Q5. What are your views regarding the option to close the scheme?

Q6. If we were to take this option, what do you think would be a reasonable period of notice?

Q7. Do you have any further evidence of the pros and/or cons to the closure of this scheme?

Further Information

In all cases, the panel is *in situ* and would need to be re-appointed if option one and two were chosen, or if option three was chosen and there were claims outstanding at this time.

Annex A: The Consultation Code of Practice Criteria

1. Formal consultation should take place at a stage when there is scope to influence policy outcome.
2. Consultation should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.
3. Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.
4. Consultation exercise should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.
5. Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.
6. Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.
7. Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

This consultation is being run in accordance with the Government's Consultation Principles. The Consultation Principles are available on the Cabinet Office website:

<http://www.cabinetoffice.gov.uk/resource-library/consultation-principles-guidance>

Comments or complaints

If you wish to comment on the conduct of this consultation or make a complaint about the way this consultation has been conducted, please write to:

John Conway,
BIS Consultation Co-ordinator,
1 Victoria Street,
London
SW1H 0ET
Telephone John Conway on 020 7215 6402
or e-mail to: John.Conway@bis.gsi.gov.uk

Contact Us:

EPCAP and Baltic State Schemes Consultation
Department of Business, Innovation and Skills
1 Victoria Street
London
SW1H 0ET
Tel: 0207 215 8779
Email: janette.plumridge@bis.gsi.gov.uk

Annex B: Consulted Parties and Targeted Countries

The department have identified the following parties whom may be interested in providing their thoughts to this consultation and have contacted these groups and individuals directly. If you feel there are other individuals or organisations who should receive the consultation please contact us, using the contact details below, so the consultation can promptly be sent to them. Alternatively, you can make copies of this consultation without permission or the consultation is available electronically at <https://www.gov.uk/government/consultations/enemy-property-payments-and-baltic-states-schemes-review>.

	Individual/Group	Why are we contacting this group/individual?
American Jewish Committee (AJC)	Jewish Advocacy Group	The AJC have a global Jewish network and we hope including the committee in the consultation will help reach these groups for them to give their input.
Angela Landau	EPCAP Panel Member	Angela Landau has been a panel member since the inception of the scheme and will be able to provide a first-hand insight into the running and the scheme and her thoughts regarding the future of the scheme.
Arthur Harverd	Acting Chairman of EPCAP Panel	Arthur Harvard has been the Acting Chairman of the EPCAP panel for the two years and a panel member since the inception of the scheme. He will be able to provide a first-hand insight into the running and the scheme and his thoughts regarding the future of the scheme.
Association of Jewish Refugees	Provides an extensive range of social and welfare services and grants financial assistance to Jewish victims of Nazi persecution living in Great Britain.	This association is dedicated to those who may have an interest in the Enemy Property Payments Scheme.

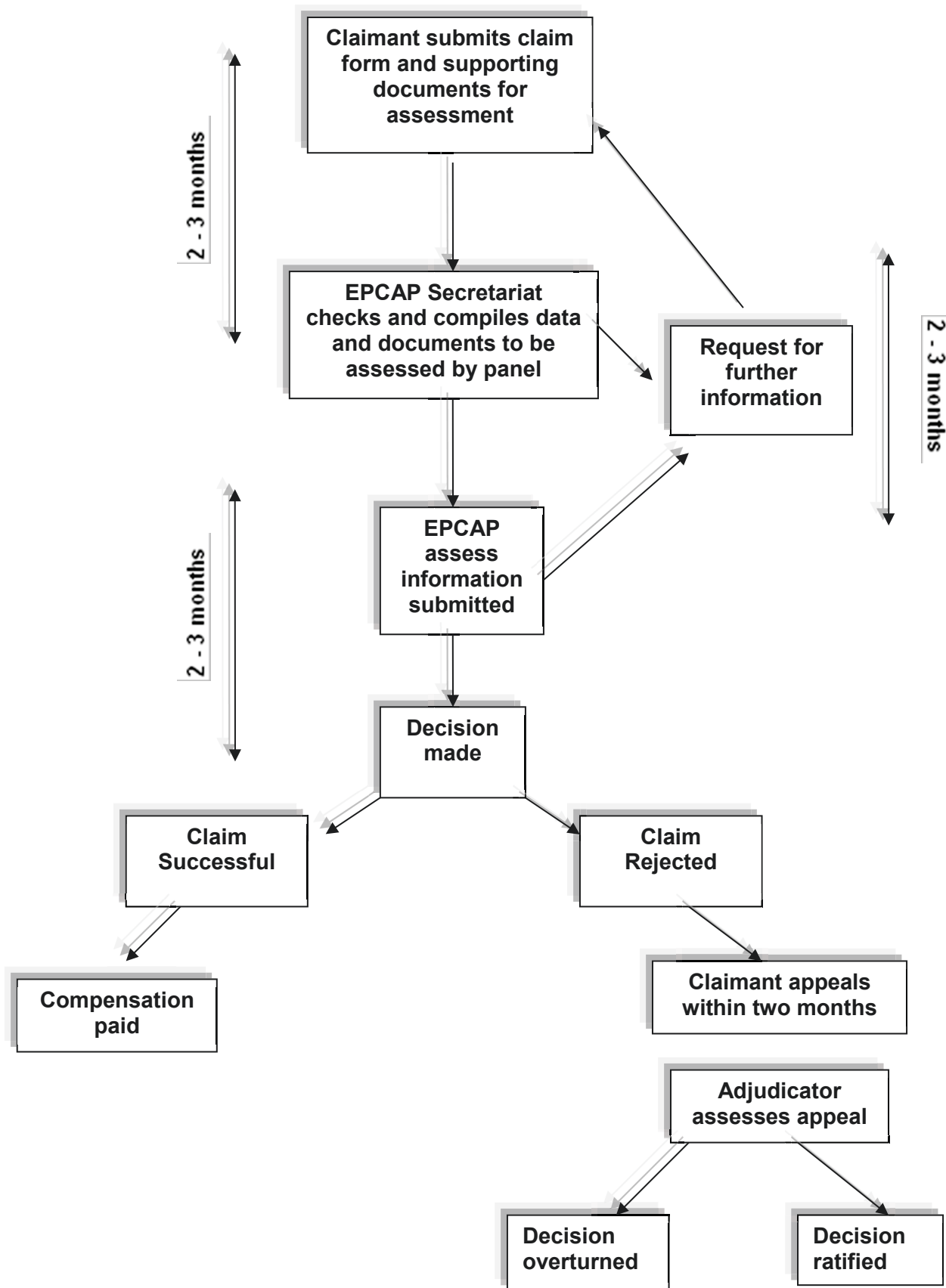
	Individual/Group	Why are we contacting this group/individual?
Charles Barrington	EPCAP Panel Member	Charles Barrington has been a panel member since the inception of the scheme and will be able to provide a first-hand insight into the running and the scheme and his thoughts regarding the future of the scheme.
Holocaust Education Trust (HET)	Educates young people from every background about the Holocaust and the important lessons to be learned for today.	HET played an influential role in the start-up of the Enemy Property Payments scheme.
Rabbi Ephraim Mirvis	Chief Rabbi of the United Hebrew Congregations of the Commonwealth	Jewish Religious Leader in the UK
Lord Neville Janner	Vice- President of the World Jewish Congress, Chairman and Co-Founder of the Holocaust Education Trust	Lord Janner contributed to Lord Archer's "Enemy Property – Independent Third Party Consultation" recommendations for the launch and running of the scheme and contributed to Lord Archer's recommendation for closure of the scheme in 2004.
Lord Simon Haskell	Labour Lord	Lord Haskell has been speaker on the inception on the scheme and contributed to Lord Archer's recommendation for closure of the scheme in 2004
Mike Posen	EPCAP Panel Member	Mike Posen has been a panel member since the inception of the scheme and will be able to provide a first-hand insight into the running and the scheme and her thoughts regarding the future of the scheme.

	Individual/Group	Why are we contacting this group/individual?
Sally Friend	EPCAP Panel Member	Sally Friend has been a panel member since the inception of the scheme and will be able to provide a first-hand insight into the running and the scheme and her thoughts regarding the future of the scheme.
Simon Wiesenthal Centres	Global Jewish human rights organisation.	Simon Wiesenthal Centres have offices worldwide and we hope including them in the consultation will help reach these groups for them to give their input.
World Jewish Congress (WJC)	International organization that represents Jewish communities and organizations in 100 countries around the world.	The WJC has a wide Jewish network worldwide and could reach views of others into the future of the scheme's BIS' network could not reach.

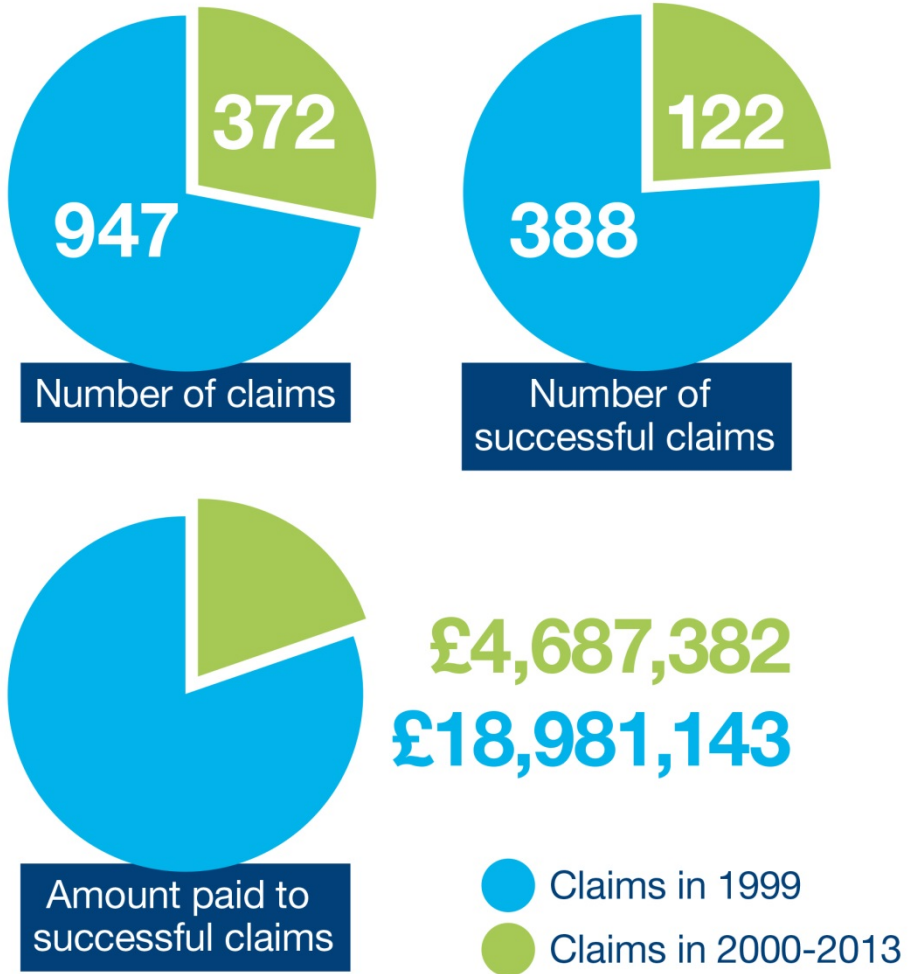
Targeted Countries

Argentina	Latvia
Australia	Lithuania
Brazil	Mexico
Canada	Poland
Czech Republic	Romania
Estonia	Russia
Germany	South Africa
Hungary	USA
Israel	Ukraine

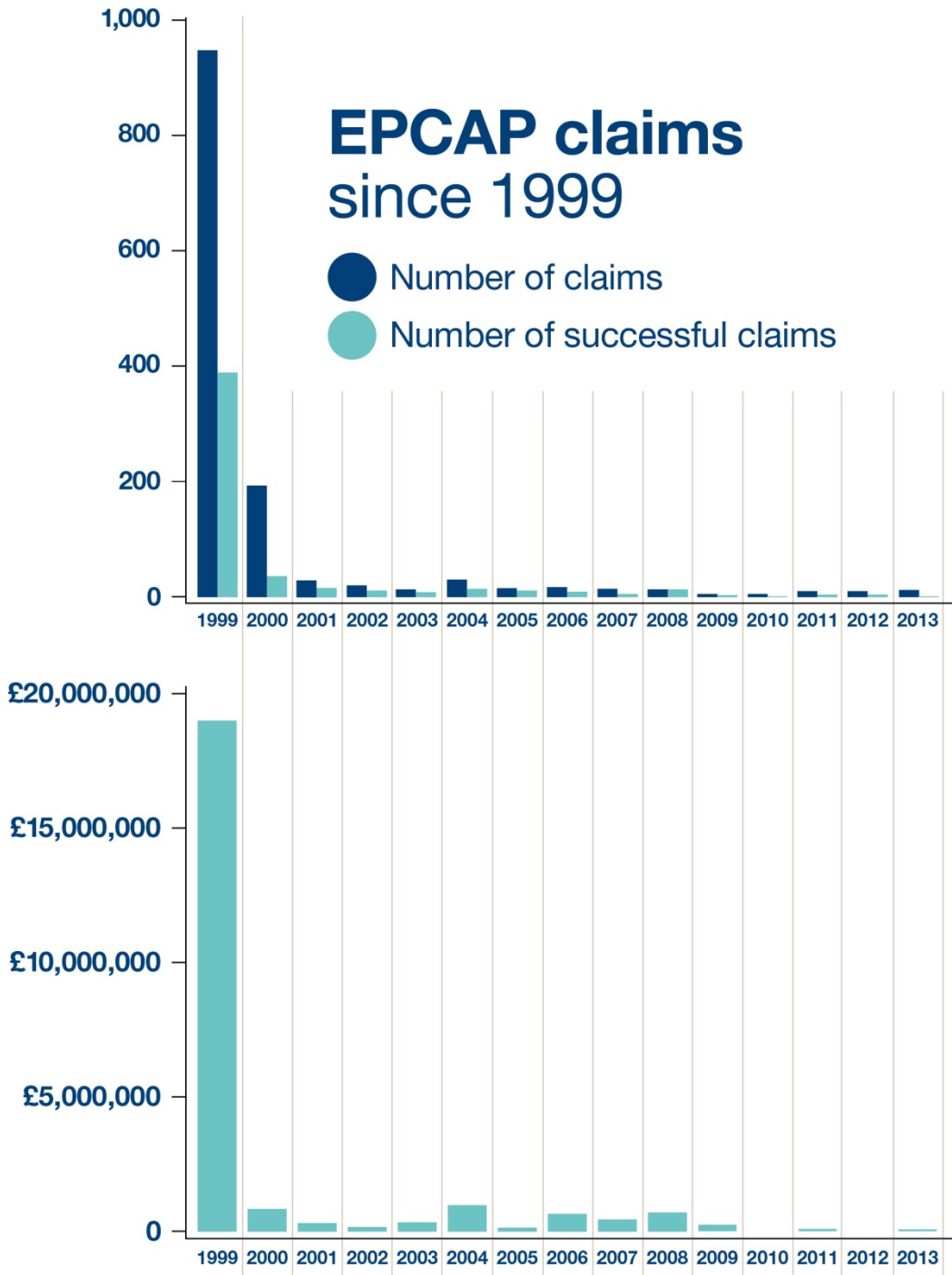
Annex C: The Claims Process



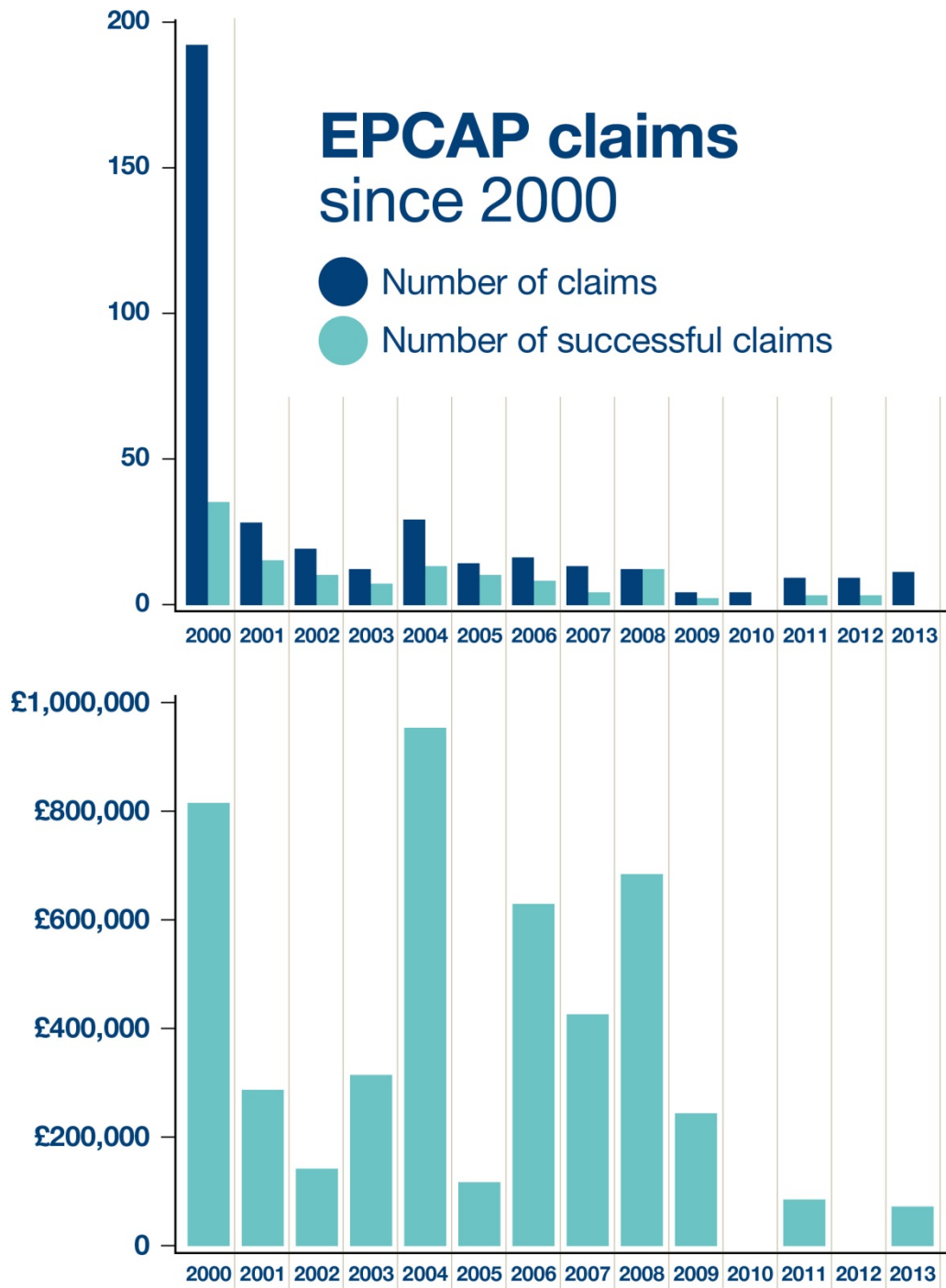
Annex D: Statistics



Comparison of claims: 1999 and 2000-2013



Amount paid to successful claimants since 1999



Amount paid to successful claimants since 2000

Year ⁵	Number of Claims	Number of Successful Claims ⁶	Successful Claims	Amount Paid to Successful Claims	Average Payout Per Claim	Lowest Payout	Highest Payout	Scheme Running Overheads ⁷
1999	947	388	41%	£18,981,143	£48,920	£18.62	£2,777,111.70	0.22%
2000	192	35	18%	£814,432	£23,269	£834.97	£225,457.56	6.03%
2001	28	15	54%	£286,107	£19,074	£579.00	£80,409.55	18.94%
2002	19	10	53%	£140,920	£14,092	£3,004.85	£33,022.69	34.49%
2003	12	7	58%	£313,587	£44,798	£400.66	£276,918.78	16.67%
2004*	29	13	45%	£952,686	£73,284	£268.50	£415,028.59	6.01%
2005	14	10	71%	£115,944	£11,594	£2,535.44	£31,694.60	33.24%
2006	16	8	50%	£628,336	£78,542	£354.60	£303,021.22	8.00%
2007	13	4	31%	£425,083	£106,271	£8,972.49	£398,228.76	11.47%
2008	12	12	100%	£683,224	£56,935	£31.89	£579,150.42	6.78%
2009	4	2	50%	£242,834	£121,417	£23,997.31	£218,836.84	20.03%
2010	4	0	0%	£0	£0	£0	£0	100.00%
2011	9	3	33%	£84,228	£28,076	£12,964.18	£36,331.60	38.57%
2012 ⁸	9	3	33%	-	-	-	-	-
2013	11	-	-	£71,115	-	-	-	-
Total	1319	510	39%	£23,668,525	£46,409	£18.62	£2,777,111.70	23%

Statistics Table

⁵ 1st January- 31st December

⁶ Includes partially successful claims (where claiming for more than one asset)

⁷ This includes administration costs, panel and adjudicator payments

⁸ Data is not yet available as claims are currently being assessed

Annex E: The future of the Enemy Property Claims Assessment Panel Scheme (EPCAP) and the Baltic States Scheme Response Form

The closing date for this consultation is **17 March 2015 (6 weeks from issue date)**

Name:

Organisation (if applicable):

Address:

Please return completed forms to:

Janette Plumridge
 EPCAP and Baltic State Schemes Consultation
 Department of Business, Innovation and Skills
 1 Victoria Street
 London
 SW1H 0ET
 UK
 Tel: 0207 215 8779
 Email: janette.plumridge@bis.gsi.gov.uk

Please tick the box that best describes you as a respondent.

<input type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Individual
<input type="checkbox"/>	Large business (over 250 staff)
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Medium business (50 to 250 staff)
<input type="checkbox"/>	Micro business (up to 9 staff)
<input type="checkbox"/>	Small business (10 to 49 staff)

Q1. What are your arguments on retention of the Enemy Property and Baltic States Scheme on their current basis?

Agree Disagree Not sure

Comments:

Q2. Do the costs of running the Enemy Property and Baltic States Scheme justify its continued operation?

Yes No Not sure

Comments:

Q3. Is Option Two a reasonable and workable solution?

Yes No Not sure

Please give your reasons.

Q4. Are you aware of any additional pros or cons to Option Two?

Yes No Not sure

If yes, please details below:

Q5. What are your views regarding the option to close the schemes?

Comments:

Q6. If we were to take option three, what do you think would be a reasonable period of notice?

Q7. Do you have any further evidence of the pros and/or cons regarding the option to close the schemes?

Yes No

If yes, please details below:

Q8. Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

Annex F: Sources

1. British policy towards enemy property during and after the Second World War, April 1998, <http://www.enemyproperty.bis.gov.uk/fcoreport.pdf>
2. "Ex-Enemy Jews" - The Fate Of The Assets In Britain Of Holocaust Victims and Survivors, Second Edition, March 1998, <http://ess.uwe.ac.uk/documents/assets1.pdf>
3. Nazi Victims: Restitution of Assets. HL Deb 18 February 1998 vol 586 cc261-83. 5.16pm http://hansard.millbanksystems.com/lords/1998/feb/18/nazi-victims-restitution-of-assets#S5LV0586P0_19980218_HOL_100
4. Nazi Victims: Assets, HL Deb 15 January 1998 vol 584 cc1133-5, 3.21pm http://hansard.millbanksystems.com/lords/1998/jan/15/nazi-victims-assets#S5LV0584P0_19980115_HOL_36



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