



Animal &  
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Agency

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Our Ref: ATIC2554

[REDACTED]  
{By Email}

29 October 2021

Dear [REDACTED]

## PROVISION OF REQUESTED INFORMATION

Thank you for your request for information about Data on the volume of non-CITES listed live wild vertebrates (excluding fish) imported into the UK between 2014 and 2018, which APHA received on 13 October 2021. Your request has been handled under the Freedom of Information Act (FOIA) 2000.

The information you requested and the response is detailed below:

“I am specifically interested in obtaining the dataset provided for World Animal Protection by APHA:

"Data on the volume of non-CITES listed live wild vertebrates (excluding fish) imported into the UK between 2014 and 2018 from all other countries was obtained from the UK APHA via a Freedom of Information Act (FOI) request, which was received on 03.09.19 (Ref: ATIC1797)" which was used for the following publication: <https://www.mdpi.com/2076-2615/10/9/1632>"

According to World Animal Protection, they could list Insectivorae based on the data you had provided for them? So I am surprised to learn that you were not able to find any records of insectivorous mammals for me?"

APHA's response to ATIC1797 can be found at Appendices 1 and 2.

“Did you search for Insectivorae as well?"

APHA informed you in response to your previous request ATIC2533 the TRACES data base does not list the species 'Insectivores' or 'Atelerix albiventris' in its data, only 'other mammals'.

“Otherwise I would highly appreciate if you could run this search for insectivorae imported from Ghana and Nigeria for the past 10 years?"

Please see Appendix 3 spreadsheet detailing animal imports from Ghana and Nigeria into UK from 2016 to date. Where the data has not been entered into the system by a third party this is represented by a / symbol.

The information that we have provided is a true reflection of the information that APHA has access to. APHA can not guarantee the accuracy of this data, as APHA can only rely on the information that has been input into TRACES (Trade Control and Expert System) by a third party for the years 2016 to 2020. APHA are unable to provide data prior to 2016 as this is no longer held in TRACES.

For 2021 data to date APHA can not guarantee the accuracy of this data, as APHA rely on the information that has been input into IPAFFS (Import of Products, Animals, Food and Feed System) by a third party.

“This previously mentioned publication states that 23 trades involving a total of 87,028 animals were made with Ghana and UK between 2014-18 and 8 trades involving a total of 2,681.88 animals from Nigeria. Is it possible to somehow access the certificates and documentation for these particular trades to try and obtain knowledge about the species and their background (bred in captivity, wild-caught etc).”

## **Section 12**

You can refuse a request if deciding whether you hold the information would mean you exceed the cost limit, for example, because it would require an extensive search in a number of locations.

By virtue of regulation 12 (2) of the FOIA, APHA may refuse to disclose information if the request for the information would involve the diversion of resources and incur excessive cost, in some of the circumstances of the case, the public interest in applying the exemption outweighs the public interest in disclosing the information. In reaching our decision with respect to the public interest, we considered the following matters:

Regulation 12(2) of the FOIA also requires public authorities to apply a presumption in favour of disclosure. However, there is a strong public interest in withholding the information. Your request covers information some of which may not be held in the same location. Gathering this specific information together, would involve a significant cost and diversion of resources from APHA's other work.

Retrieving individual records from files to establish whether the specific information is available for the response, and then reviewing each record for the appropriate information will be a costly exercise.

Likewise it has been estimated that accessing files to obtain specific details for each import will exceed the appropriate limit, which currently stands at £600 (£25 per hour).

On the basis of our estimates, we consider that the cost would far exceed this limit and, as such, we are refusing your request.

APHA consider that your request falls under regulation 12(2) on cost and resource grounds in determining whether all the information is held. Having carried out the above investigation, we have concluded that, in all the circumstances of the case, the public interest falls in favour of applying the exemption.

Information disclosed in response to this FOI request is releasable to the public. In keeping with the spirit and effect of the FOI and the government's Transparency Agenda, this letter and the information disclosed to you may be placed on GOV.UK, together with any related information that will provide a key to its wider context. No information identifying you will be placed on the GOV.UK website.

An Annex is attached which explains the copyright that applies to the information being released to you and contact details should you be unhappy with the service you have received.

If you have any queries about this letter, please contact the Access to Information Team at the email address below or postal address at the top of this letter.

Yours sincerely

**ACCESS TO INFORMATION TEAM**

Email: [enquiries@apha.gov.uk](mailto:enquiries@apha.gov.uk)

## Annex

### Copyright

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Copyright in other documents may rest with a third party. For information about obtaining permission from a third party see the [Intellectual Property Office's website](#).

### Complaints

If you are unhappy with the service you have received in relation to your request, you may make a complaint or appeal against our decision under section 17(7) of the FOIA or under regulation 11 of the EIRs, as applicable, within 40 working days of the date of this letter. Please write to the Access to Information Manager at the address at the top of this letter or email [enquiries@apha.gov.uk](mailto:enquiries@apha.gov.uk) and the team will arrange for an internal review of your case.

If you are not content with the outcome of the internal review, section 50 of the FOIA and regulation 18 of the EIRs gives you the right to apply directly to the Information Commissioner's Office (ICO) for a decision. Please note that generally the ICO cannot make a decision unless you have first exhausted APHA's own complaints procedure. The ICO can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### Coronavirus

If you need to contact the ICO during the Coronavirus pandemic, it's best to do so online. Please click [here](#) for contact details. You can also call them on 0303 123 1113.