Dear Sir/Madam

EIDCymru: An electronic movement reporting system for sheep / goats; Identification of Sheep and the Slaughter Derogation

The above consultation paper has been considered by each of the Farmers’ Union of Wales’ twelve County Executive Committees, and by the Union’s Hill Farming and Marginal Land and Livestock, Wool and Marts Committees.

The views of all those committees have been taken into account in drafting the below response.

Yours sincerely

[Signature]

Nicholas Fenwick

Director of Agricultural Policy

30th May 2014
Section 1- EIDCymru: An electronic movement reporting system for sheep/goats

General Comments

The majority of Members expressed significant concerns regarding the implications of adopting EIDCymru, and emphasised the need for compatibility with systems in other regions of the UK.

Major concerns existed regarding the increase in financial and time costs implied by many of the proposals, including in terms of movements within or between farms or to tack land given the proposed changes to the CPH system.

In particular, it was emphasised that the exceptions which apply where sheep move from one holding to another but the ownership does not change should not change under any new system or rules, and that the minimum information required on movement documents and flock records should, in such circumstances, continue to be the number of sheep moved.

Given the EU’s refusal to recognise the need for tolerances which take account of the inherent flaws of transponder technology, and the unattainability of consistent 100% read-rates, Members queried the logic of any moves which would increase the proportion of movements which would have to be individually recorded and reported, given that this would lead to an identical increase in the proportion of Cross Compliance breaches caused by those flaws.

1.1 Do you agree that EIDCymru is developed with the following operational requirements:

a. gatherings, livestock markets and abattoirs are mandated to report moves electronically on an individual basis (where applicable)

The majority of Members supported the proposal to require gatherings, livestock markets and abattoirs to report moves on an individual basis, where applicable.

It was emphasised that farmers should retain the right to correct reported moves, but that double reporting (on and off, as is the case with cattle) should not be a requirement, due to the problems that this has previously caused in terms of cattle movements.

Members believed it wholly unacceptable that the EU continued to refuse to allow degrees of tolerance which took account of scanning errors and transponder failures, despite irrefutable evidence gathered during studies relating to the movement of millions of sheep which demonstrated levels of scanning failure and transponder deterioration which would lead to unavoidable Cross Compliance breaches.

It was noted that such illogical intransigence brought the EU into disrepute and added to concerns regarding the EU as an institution – concerns exacerbated by the European Parliament’s decision in April 2014 to reject proposals to allow sheep to be tagged only when leaving the holding of birth.

Concerns were expressed regarding the practical and animal health and welfare implications of requiring collection centres to report such movements in
circumstances where animals would have to be unloaded and reloaded in order to comply with such a requirement.

b. gatherings, livestock markets and abattoirs are mandated to scan and report the full ID number in the transponder of electronic slaughter tags

*The majority believed that where such scanning and reporting was required, it should only have to meet the minimum legal requirement under EU law, while bearing in mind that the overwhelming majority would invariably choose to record and report the individual number of electronic slaughter tags.*

c. gatherings, livestock markets and abattoirs report moves to their premises within 24 hours of the move being completed

*The majority believed that it would generally be considered more practical by those organising gatherings, livestock markets and abattoirs to report such movements at the earliest opportunity, and well within 24 hours. However, a strict requirement to report movements within 24 hours would fail to take account of the type of technological failings which sometimes occur at Central Point Recording Centres, and a three-day maximum time limit would therefore be appropriate.*

*SUCH a limit would be in line with cattle movement reporting requirements while also being a significant improvement on the current period between reporting sheep movements, and those movements being entered onto the Animal Movement Licensing System database.*

d. keepers who choose to report moves to their premises by the electronic route must report those moves within 24 hours of the move being completed

*Members overwhelmingly rejected the suggestion that those who choose to report moves to their premises electronically should do so within 24 hours, highlighting the fact that this was a disincentive which would penalise those choosing to use a form of technology championed by the Welsh Government.*

*It was therefore believed that no difference should exist between the deadlines for reporting movements by paper and by electronic means.*

e. a bureau facility will replace the current function undertaken by the Local Authority and undertake the additional role of a help desk and to process paper movement documents for those keepers who, for a set period, do not report moves electronically or are unable to do so

*The majority supported the establishment of such an agency, but concern was expressed regarding the possibility that the cost of operating such an agency could at some point fall back on the industry, or that the option of reporting movements by paper would be withdrawn before broadband technology and rising IT skills had made this a practical and affordable option for all.*

*Members emphasised the importance of allowing documents to be faxed to such an agency, as is currently the case.*
1.2 Do you agree that the electronic database / system could be used (as an alternative to the paper records kept) by keepers on a voluntarily basis as a means of a free electronic flock record for keepers?

Members generally supported the option of using the electronic database as an alternative to keeping paper records. However, it was believed that a form of access to the data held similar to the BCMS/CTS user interface was essential.

Section 2 - Slaughter Derogation - Questions

2.1 Which identification options do you support and why?

The majority of Members supported the retention of the non-EID slaughter tag, while a significant proportion of that majority agreed with limiting the use of non-EID slaughter tags to movements direct to slaughter.

The retention of the non-EID slaughter tag was supported for the following reasons:

i. The DEFRA impact assessment report published on the Welsh Government website as part of the consultation suggests that around 66% of slaughter tags purchased are non-EID slaughter tags, and that EID slaughter tags cost between 47 and 88 pence more than non-EID slaughter tags.

If the number of Welsh lambs destined for slaughter is estimated to be 3 million, the replacement of non-EID slaughter tags with EID slaughter tags would, based upon DEFRA’s figures, represent an additional annual cost for the Welsh sheep industry of between £940,000 and £1,760,000.

ii. The FUW has fully supported the voluntary use of EID by farmers since its inception, and has consistently argued that those further down the supply chain who want EID should incentivise its use by farmers.

Statistics clearly demonstrate that those further down the supply chain who advocate the compulsory introduction of EID nevertheless do not regard it as sufficiently valuable or worthwhile to put such market drivers in place by paying a premium for EID lambs. Moreover, others further down the supply chain admit that they are content with the current batch system and that suggestions that consumers wish to see full EID are spurious.

As such, there seems little doubt that the increased costs for the industry estimated above will be paid for by sheep farmers, rather than being spread evenly across the supply chain, and this at a time when the Minister is calling for farmers to become more efficient.

iii. Whilst there are those for whom EID may benefit their businesses, compulsory EID for lambs destined for slaughter would bring negligible benefits for those producing store lambs. As such, given the stratification of the Welsh sheep industry, a large number of producers would see negligible benefits unless those further down the
supply chain were prepared to meet the additional costs associated with EID – something which history demonstrates they have not been prepared to do.

iv. The introduction of EID for animals moved directly to slaughter would place an additional burden on smaller slaughterhouses – particularly if combined with a requirement to report the movement of all animals tagged with slaughter EID tags individually. This is particularly the case for movements to local slaughterhouse where batch movements are more than adequate and traceability is assured to customers on a farm-name basis.

Section 3 - Injectables: Questions

a) Do you agree that injectable transponders should be permitted as a means of double identification of sheep and goats (i.e. an ear tag and injectable)?

b) Do you agree that the use of injectable transponders should be permitted only for sheep and goats that do not go into the food chain?

c) Do you agree that injectable transponders need not be applied by vets, but as a minimum be implanted by trained and competent personnel?

d) Do you agree that a reserved tag colour is to be used when an implant has been applied should be black and that the letter “I” is placed on the tag to demonstrate the animal has an injectable electronic transporter and likewise “B” for boluses?

Members expressed numerous concerns regarding the use of injectable transponders, and supported further research into the use of such technology. However, the majority of agreed with proposals (a) to (d).