

# Response Form



Llywodraeth Cymru  
Welsh Government

## Changes to Livestock Identification, Registration and Movement Reporting Consultation



**Date of issue: 30 September 2021**  
**Action required: Responses by 2 January 2022**

**This consultation is seeking views on the proposal to amend livestock identification, registration and movement reporting in Wales.**

### **Consultation Response Form**

<b>Name</b>	<b>British Veterinary Association</b>
<b>Organisation (if applicable)</b>	<p>British Veterinary Association</p> <p>The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom’s veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters. Members of BVA’s Policy Committee, which includes vets in companion animal practice, have provided input into our response to the consultation, as have BVA’s Welsh Branch.</p> <p>BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.</p>
<b>Email/telephone Number</b>	020 7908 6335
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### **Questions –**

<b>Section One – Mandatory whole movement reporting</b>	
<b>1.1</b>	<p><b>What are your views on the introduction of whole movement reporting for cattle?</b></p> <p>We support the introduction of whole movement reporting for cattle, bringing them into line with current requirements for other species. This will improve traceability and aid disease control.</p>

1.2	<p><b>Are there any situations where it is not possible to record the destination CPH? If so, can any steps be taken so this information can be provided?</b></p> <p>We are not aware of any situations in which it would not be possible to record the destination CPH. This requirement is already in place for movement of sheep.</p> <p>Additional guidance may be required for recording the movements of animals being sent to market. There will be a need for agents acting on behalf of livestock keepers to ensure all relevant information is available.</p>
1.3	<p><b>Do you have any additional views on this?</b></p>

## Section Two – Mandatory journey information for all livestock

2.1	<p><b>Do you support the collection of the haulier and transport details for all livestock movements? Please provide reasons for your view.</b></p> <p>We are supportive of this principle as another measure to help control the spread of disease, improve traceability and protect animal welfare. Any journey can impact on animal welfare or disease risk, so having a complete record is important for managing these.</p> <p>However, we are concerned that this would add an extra burden onto farmers, especially if the information required is complex. Hauliers may pick up and drop off animals at a time when the livestock keeper is not present, and keepers may not be able to record information at the time of movement due to poor internet accessibility or lack of time. An option to provide a paper copy or upload the information later would be required to avoid gaps in the data.</p>
2.2	<p><b>Are there any situations when you would not be able to provide all the journey details? Please provide examples.</b></p> <p>As mentioned in response to 2.1, there will need to be some flexibility in when the information is recorded. Hauliers may pick up and drop off animals at a time when the livestock keeper is not present, and keepers may not be able to record information at the time of movement due to poor internet accessibility or lack of time. An option to provide a paper copy or upload the information later would be required to avoid gaps in the data.</p>

2.3	Do you have any additional views on this?
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**Section Three – Mandatory change to CPRC reporting timescales**

3.1	<p><b>Do you agree with our aspiration to make CPRC same day reporting mandatory? Please provide your reasons for this?</b></p> <p>We support same day reporting, as this would improve traceability and enable quicker action in the control of disease outbreaks.</p> <p>It is important to note that some markets operate over a long time, and some movements take place overnight, so 24 hour reporting would be more appropriate.</p>
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3.2	Do you have any additional views on this?
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**Section Four – Voluntary pre-movement reporting for all livestock**

4.1	<p><b>Are there any situations where the current paper passport is still required?</b></p> <p>We are concerned that internet accessibility is poor in some areas of Wales, and the reporting system must take this into account. There is also an accessibility issue as some farmers will not have the skills or confidence with IT to use a new system. There may still be strong preference for a paper passport, which needs to be handled with care and compassion.</p>
4.2	<p><b>Are there any situations where the current paper AML1 is still required?</b></p>
4.3	<p><b>Would you welcome the use of more digital services? What do you require in order to do this? E.g. training</b></p> <p>We recognise the role of new technologies and innovative methods in monitoring animal health and welfare outcomes, addressing animal health and welfare conditions and optimising the contribution of each animal to agriculture systems.</p> <p>We support the use of more digital services as this will improve traceability and aid disease control. Electronic Identification (EID) in sheep has led to increased monitoring of individual animals allowing early detection of problems and targeted solutions. For example, with the use of EID, the <a href="#">Moredun Research Institute</a> has carried out a research project focussing on lamb worming management to target individual requirements, which has the potential to slow anthelmintic resistance<sup>1,2</sup>.</p> <p>An electronic system which automatically links the tag number and passport would also remove the risks of human error in recording information and providing passport details.</p>

<sup>1</sup> Kenyon, F., McBean, D., Greer, A.W., Burgess, C.G.S., Morrison, A.A., Bartley, D.J., Bartley, Y., Devin, L., Nath, M. & Jackson, F., 2013. A comparative study of the effects of four treatment regimes on ivermectin efficacy, body weight and pasture contamination in lambs naturally infected with gastrointestinal nematodes in Scotland. *Int J Parasitol Drugs Drug Resist.* 3, 77-84

<sup>2</sup> Greer, A.W., Kenyon, F., Bartley, D.J., Jackson, E.B., Gordon, Y., Donnan, A.A., McBean, D.W. & Jackson, F., 2009. Development and field evaluation of a decision support model for anthelmintic treatments as part of a targeted selective treatment (TST) regime in lambs. *Vet. Parasit.* 164, 12-20

Following Eu-exit, this is a time of significant change and uncertainty for farmers, so it will be important to provide plenty of guidance, training, and support to use the new system.

**4.4.** How do you currently report movements and why?

Cattle	Online <input type="checkbox"/>	Paper <input type="checkbox"/>	Telephone <input type="checkbox"/>
Pigs	Online <input type="checkbox"/>	Text <input type="checkbox"/>	Telephone <input type="checkbox"/>
Sheep	Online <input type="checkbox"/>	Paper <input type="checkbox"/>	
Goats	Online <input type="checkbox"/>	Paper <input type="checkbox"/>	
Deer	Online <input type="checkbox"/>	Paper <input type="checkbox"/>	

**Why?**

This question is not applicable to BVA

**4.5** **Do you have any additional views on this?**

It will be important to ensure that animals returning unsold from market are catered for by the system.

<p><b>5.1</b></p>	<p><b>Would you consider using EIDCymru as an electronic register instead of your paper flock book/herd book? What are your reasons for this?</b></p> <p>This question is not applicable to BVA</p>
<p><b>5.2</b></p>	<p><b>Do you agree with the introduction of paperless reporting for all livestock? What are the reasons for your views?</b></p> <p>We support introducing the ability to have paperless recording for all livestock, due the benefits this can bring for animal health and welfare. Electronic Identification (EID) in sheep has led to increased monitoring of individual animals allowing early detection of problems and targeted solutions. For example, with the use of EID, the <a href="#">Moredun Research Institute</a> has carried out a research project focussing on lamb worming management to target individual requirements, which has the potential to slow anthelmintic resistance<sup>3,4</sup>.</p> <p>However, it will be important to provide an alternative for livestock keepers who do not have internet access.</p>
<p><b>5.3</b></p>	<p><b>Are there any reasons why you would want to continue to register births, deaths or report movements using paper forms?</b></p> <p>This question is not applicable to BVA</p>

<sup>3</sup> Kenyon, F., McBean, D., Greer, A.W., Burgess, C.G.S., Morrison, A.A., Bartley, D.J., Bartley, Y., Devin, L., Nath, M. & Jackson, F., 2013. A comparative study of the effects of four treatment regimes on ivermectin efficacy, body weight and pasture contamination in lambs naturally infected with gastrointestinal nematodes in Scotland. *Int J Parasitol Drugs Drug Resist.* 3, 77-84

<sup>4</sup> Greer, A.W., Kenyon, F., Bartley, D.J., Jackson, E.B., Gordon, Y., Donnan, A.A., McBean, D.W. & Jackson, F., 2009. Development and field evaluation of a decision support model for anthelmintic treatments as part of a targeted selective treatment (TST) regime in lambs. *Vet. Parasit.* 164, 12-20

5.4	<p><b>Do you agree with our proposal to reduce herd register timescales for reporting the birth of beef calves to 27 days? What are your reasons for this?</b></p> <p>We support the principle of simplifying the requirements by bringing the timescales into line, however reducing the number of days may increase the risks of the deadlines being missed, especially as livestock keepers will be used to the current timeframes. It would be advisable to increase the timescale for registering the births of new born calves to 30 days instead.</p> <p>We have heard reports that many farmers who have not registered a calf within the required time period currently falsify their records in order to register the calf, in some cases several months later, to avoid the animal becoming valueless. Whilst we understand the need for a reporting deadline, it may be beneficial to introduce some facility to report late, to reduce the perverse incentive to falsify records.</p>
5.5	<p><b>Do you have any additional views on this?</b></p> <p>Any new electronic system must be compatible with those in other parts of the UK and allow sharing of information.</p>
<p><b>Section Six – Voluntary show and event movement changes for all livestock</b></p>	
6.1	<p><b>What are your views on our proposal to allow exhibitors to create circular moves?</b></p> <p>We support efforts to simplify the reporting process, and encourage the use of more digital services for improved traceability and disease control.</p>



6.2	<b>Do you have any additional views on this?</b>
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**Section Seven – Changes proposed for pig identification and traceability**

7.1	<p><b>What are your views on the aspiration to make annual registration and an annual inventory for pigs mandatory?</b></p> <p>We support the principle of registration for pigs. We currently lack a clear picture of the pig population in the UK as pigs kept as pets are not always correctly registered. In 2020, Wales was thought to have 28,400 pigs on 1,339 holdings, with an average herd size of 21 animals and many units being very small<sup>5</sup>. Improved traceability is needed to effectively manage disease threats, such as African Swine Fever.</p> <p>An annual inventory would be helpful, but as pigs may only be on a premises for a few months, this is unlikely to produce an accurate representation of the population. Animals should be registered when they are born or brought onto the premises.</p>
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7.2	<p><b>What do you think about the introduction of electronic tagging for pigs from when they leave their holding of birth? Do you think it should be made mandatory for breeding stock (gilts, sows and boars)?</b></p> <p>It is important that the breeding stock are identified both uniquely and in robust ways that do not get in the way of processing carcasses later on. Culled breeding stock are handled at only a small number of slaughterhouses, and predominantly at a single site in England, so having a method of tracing these culled animals through market and collection points is important to identify the holding of origin. Pigs being fattened and processed also commonly travel to larger slaughterhouses in England, so effective identification is important.</p> <p>However, there is likely to be an issue with retention of ear tags on pigs, as they are likely to chew and destroy these. Tagging may also lead to additional welfare risks with torn ears and the presence of blood potentially increasing the risk of pigs biting each other. If ear tags are the only form of ID used, once lost from multiple pigs it will become difficult to identify individuals, leading to further potential unintended welfare consequences. Furthermore, there is a market for pigs ears which may be impacted on if they contain holes from the tags.</p> <p>Electronic identification may be possible for breeding units, but may not be necessary in most (small) holdings. Identification for fattening animals moved in batches directly to slaughterhouses may not need to be electronic.</p>
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<sup>5</sup>HCC Industry Statistics

	<p>A study of the way the Welsh pig industry moves its animals and destinations might better inform a risk assessment on the identification method for the fattening pigs, so that any system is efficient and robust enough for public health as well as disease control needs.</p>
<p><b>7.3</b></p>	<p><b>What are the benefits or potential obstacles to pig identification including the herd mark and unique ID number?</b></p> <p>Unique identification will help to improve traceability, animal health and human health standards.</p> <p>However, there is likely to be an issue with retention of ear tags on pigs, as they are likely to chew and destroy these, and making holes could impact on the sale of pigs ears to current markets.</p>
<p><b>7.4.</b></p>	<p><b>Do you have any additional views on this?</b></p>

## Other Questions

**8 EIDCymru will be a fully bilingual service. We would like to know your views on the affects you think the extension of EIDCymru and introduction of Bovine EID could have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?**

BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication, and it is important for animal health and welfare that farmers in all parts of Wales are able to services in their chosen first language.

**9 Please also explain how you believe the proposed policy options could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

This is not within BVA's remit

**10 We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.**

As with pigs, goats are often kept as pets and some may not be correctly registered or ID marked. This means we lack a clear picture of the population in the UK, leading to difficulties for disease control in the event of an outbreak. We would like to see efforts made to improve this and encourage goat owners to register their animals.

Responses to consultations may be made public, on the internet or in a report.  
If you would prefer your response to be kept confidential, please tick here:

### **Consultation response form (continuation sheets)**

**Section & Question number:**



## Consultation response form (continuation sheets)

Section & Question number:

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Section & Question number:

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