

BVA Northern Ireland Branch, BCVA and NIVA response to Department of Agriculture, Environment and Rural Affairs (DAERA) consultation: Introduction of Mandatory Bovine Electronic Identification (EID) in Northern Ireland (NI)

Question 7

Do you support the mandatory implementation of bovine EID for newborn calves in Northern Ireland?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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Comments

The British Veterinary Association (BVA), North of Ireland Veterinary Association (NIVA), and British Cattle Veterinary Association (BCVA) jointly support the use of electronic ear tags as an official means of identification in cattle. It is consistent with both the Northern Ireland Executive's and UK Government's principles of 'digital by default' and moving towards paperless transactions and has great potential to increase accuracy, reduce recording, transcription and potential subsequent certification errors and increase the health and safety of those involved in such tasks.

We agree that the use of electronic identification (EID) can simplify the way all animal events, including movements, are recorded for farmers, markets, abattoirs and the Department, generating significant efficiencies throughout the supply chain. We also agree with the expectation that EID would reduce administrative burdens, improve transparency and health and safety throughout the supply chain, while supporting overall efforts to control disease in Northern Ireland (NI). We have already seen these benefits take shape in the sheep sector since mandatory EID was introduced for sheep in NI in 2009.

This policy is in line with that of the Republic of Ireland, where mandatory EID for newborn cattle has been in place since 2022, and it complies with the EU Animal Health Law (AHL) rules on the identification, registration and movement of livestock. It is also aligned with similar initiatives in Scotland, England and Wales, with the latter two similarly aiming for mandatory EID for newborn calves from 2027. It is imperative that any solution in NI is compatible, inter-operable and ideally identical to those being taken forward in the other three nations of the United Kingdom as well as the Republic of Ireland, both in terms of the technology and numbering systems employed. This is fundamental for an efficient and error-free nationwide system of traceability across the UK.

Question 8

Do you agree with the Department’s proposed approach to the implementation of mandatory bovine EID?

Yes	✓	No	<input type="checkbox"/>	Don’t know	<input type="checkbox"/>
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Comments

We support the overall intentions and objectives of this initiative, particularly its focus on improving traceability, disease control, data accuracy and efficiency across the cattle sector. We also welcome the proposals for a phased implementation. This helps to bring industry along with the policy change, rather than imposing it in a way that risks unnecessary operational or financial detriment. Allowing farmers and the wider industry time to adapt, invest and build confidence in the system is more likely to secure long term compliance, identify any issues early, and realise the intended benefits of EID.

We also recognise the steps that have been taken to ensure the practical implementation of this policy, subject to a positive consultation response. For example, limiting the statutory identification device/location to a tag in the ear provides certainty to those veterinary surgeons who are required to assuredly identify the animal for animal health, public health or export certification purposes. Meanwhile, committing to an upgrade of the Northern Ireland Farm Animal Information System (NIFAIS) database is an important step towards achieving ‘real time’ event logging, which has long been an aspiration for both commercial reasons and disease surveillance.

However, we also have some feedback about elements of the proposed approach. These suggestions relate to the choice of technology and the treatment of the existing cattle population, both of which are important for the long-term viability of this initiative.

Below we provide a:

- Comparison of low frequency (LF) and ultra-high frequency (UHF) technology
- Suggestion of a clear strategy for the current or ‘historical’ herd

Low Frequency vs Ultra-High Frequency Technology

Although this consultation does not give preference to either UHF or LF technology, one would expect the latter to be deployed since UHF is not recognised within the International Standards Organization (ISO) standards referenced for official livestock identification, and therefore cannot currently be used as the official statutory bovine EID technology under the EU AHL, with which Northern Ireland is required to comply.

While LF is a proven technology, and used in the EU, we are concerned about its limited

effective reading range. We would prefer to see UHF technology adopted because its greater range makes it much safer for those recording animal ID numbers at all Critical Control Points (CCPs) both on farm and off, such as abattoirs, markets and collection points. It also has increased data capacity, making it future proof and limiting conflict with other LF technology (boluses, segregation gates, etc).

Industry preferences for UHF were seen in the equivalent consultation in Scotland, where 73% of respondents were in favour of the technology. The Scottish Government subsequently altered its policy of mandatory EID implementation from LF to UHF technology. We recognise that this is unfortunately unlikely to be an option in NI due to its obligations to the EU AHL.

NI could opt to introduce LF technology initially, then change to UHF if and when the technology is recognised within the relevant ISO standards and under the EU AHL. However, investing in two technologies will likely result in higher long-term costs, as well as requiring two transition periods. A significant proportion of cattle have a long lifespan which will lead to a long transition phase for each change in technology.

Notwithstanding the above, we appreciate the fact that LF allows for greater compatibility with systems in the EU, Republic of Ireland, England and Wales which use the same LF technology. As emphasised in the answer to Question 1, it is imperative that any solution in NI is interoperable with its devolved equivalents and does not come at the price of disrupting the national UK-wide system of traceability.

EID for the Current/Historical Herd

This consultation focuses on newborn calves, while also recognising that the full benefits of EID for the wider industry are unlikely to be realised until a substantial proportion of the national herd is identified electronically. We agree with this assessment and consider that a prolonged mixed population of EID tagged and non-EID tagged cattle risks undermining gains in efficiency, accuracy, health and safety, disease control and animal welfare, particularly for those working routinely with adult cattle in field conditions.

In the first instance, we agree that where animals from the existing or 'historical' herd lose their identity tags and cannot be identified by other approved means, they should be re-identified using EID tags. In addition, there is a strong case for aligning the progressive capture of the current herd with the Ruminant Genetics Programme, which already involves the safe handling and identification of animals and appears to be an early vehicle for engaging the existing population. Using this programme as a primary mechanism for introducing EID in the existing herd would help limit friction in bringing older animals on board, avoid unnecessary repeat handling or re-tagging, and maximise the benefits of both initiatives.

Furthermore, for those herd keepers who wish to transition more rapidly to whole herd EID than would be achieved through natural wastage or tag loss alone, it should be made permissible to replace traditional tags with EID in mature dairy and breeding stock, on a herd-

by-herd basis, without awaiting loss of the traditional ear tag, potentially subject to formal approval by the Department from day one.

Beyond this, we believe there is a strong strategic case for setting a clear direction of travel towards eventual whole herd EID adoption, as operating two identification systems in parallel for an extended period will inevitably limit the realisation of the policy's intended benefits.

However, we also recognise that mandatory re-tagging of adult cattle raises legitimate concerns. These include the financial burden on herd keepers, the additional labour and handling required, and the health and safety and animal welfare risks associated with tagging adult animals. These factors mean that any move towards wider re-tagging the existing herd must be approached pragmatically and proportionately.

We therefore consider that decisions on the timing, scope and mechanism for any future re-tagging of the historical herd are best informed by DAERA, drawing on its data and understanding of herd demographics, production systems and practical on-farm realities. A phased, evidence-led approach – informed by further consultation at a later stage – would allow progress towards majority EID coverage while avoiding disproportionate cost or risk to farmers and those working with cattle. At this stage of the roll-out, some financial incentivisation for affected herd-keepers could be considered to encourage and expedite the complete transition to EID.

Question 9

Do you have any comments to make in relation to the Regulatory Impact Assessment, and its conclusions, or any additional information regarding impacts/costs?

Comments

We broadly agree with the conclusions of the Regulatory Impact Assessment, including the identification and balance of costs and benefits across the sector. Having considered the three options presented, we agree with the Department that Option 1, the introduction of mandatory electronic identification for newborn cattle, represents the most effective and proportionate approach.

While there are modest and largely upfront costs associated with implementation, these are clearly outweighed by the monetised and non-monetised benefits identified, including efficiencies for herd keepers, markets, processors, veterinary practices and DAERA, alongside improved accuracy, health and safety, traceability and disease control. We agree that the full benefits of EID will only be realised through widespread uptake across the national herd, which is unlikely to be achieved under a voluntary model, and that maintaining the status quo would risk NI falling behind comparable jurisdictions and missing these longer term gains.

We particularly welcome the efforts made to ensure interoperability and minimise friction to trade, especially given NI's close trading and disease control links with Great Britain and the Republic of Ireland.

Question 10

Do you have any comments to make in relation to the Rural Needs Impact Assessment, and its conclusions?

Comments

We agree with the overall findings of the rural needs assessment. While it is important to acknowledge the additional costs for farmers associated with the introduction of bovine EID, these are anticipated to be outweighed by tangible benefits.

Namely, bovine EID is expected to support improved herd management and a reduction in paperwork, enable faster and more reliable identification of cattle, especially during disease outbreaks, and enhance transparency across the supply chain. It is also likely to streamline processes, reduce animal handling and improve health and safety standards on farms, at markets and in processing facilities. By minimising human error and increasing accuracy, bovine EID will support improved traceability within the livestock sector.

Question 11

Do you have any comments to make in relation to the Equality and Disability Screening, and its conclusions?

Comments

N/A