



Department
for Environment
Food & Rural Affairs

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Electronic movement reporting system (including an underpinning database for sheep, goats and deer (England) and proposed changes to the way in which sheep and goats are identified

Responses to the public consultation

July to September 2013

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Department for Environment, food and Rural Affairs

Summary of responses to the public consultation in England (29 July - 30 September 2013) on the sheep, goat and deer electronic movement reporting system and changes on sheep and goat identification to the Sheep and Goats (Records, Identification and Movement) (England) Order 2009 called SAGRIMO.

Background

Electronic reporting of sheep, goat and deer movements

1. This consultation sought views on arrangements for delivery of a new electronic reporting service for sheep, goat and deer movements in England. This followed on from the appointment of a service provider contracted by Defra on the basis of a high level specification drawn up in discussion with stakeholder bodies.
2. The consultation proposal was to modernise the current system where movements of these animals are reported to Local Authorities (LAs) on paper movement documents by destination keepers. LAs record the movements onto the government's Animal Movements Licensing System (AMLS).
3. The paper method of reporting movements would be replaced by a commercially operated electronic movement system supported by a new database. The electronic service would provide more accurate and timely information on sheep, goat and deer movements. Keepers would have the option to report movements electronically or continue with paper reporting through a free of charge paper bureau service operated by SouthWestern. Markets and abattoirs would be required to report movements electronically - which will account for around 70% of annual movements reported for these species. As well as easing the burden on keepers from reporting movements, the new electronic system would enhance Government and industry's ability to manage future disease outbreaks.

Other areas consulted upon

Electronic Identification of slaughter lambs

4. Currently keepers have two choices to identify slaughter lambs with a single tag; a non-electronic or an electronic ID (EID) tag. The proposal was to only permit the use of the EID slaughter tag. The rationale was to; address compliance issue caused when recording mixed batches of slaughter lambs in high volume premises; simplify slaughter lamb tagging rules, maximise the benefits of electronic reporting, and provide more robust data to support any future negotiations with the EU on EID issues such as an EID record keeping tolerance during cross compliance inspections.

New option (injectable) for adult sheep and goats

5. The proposal was to extend the range of EID identifiers to permit the use of an injectable identifier – as part of the option for “double identification” of sheep and goats (animals intended to be retained past 12 months of age). This would be subject to certain restrictions.

Legislation

6. Moving to electronic reporting and proposed changes to identification would require changes to the legislation which covers sheep and goat identification and tracing - The Sheep and Goats (Records, Identification and Movement) (England) Order 2009 referred to as "SAGRIMO". Deer movements are mandated via a General Licence which would be amended to provide for electronic reporting.

Principal consultees and interested parties

7. The consultation sought the views and comments on these proposals directly from the main industry bodies representing the sheep and goat sector including:-

- | | |
|---|---|
| a) National Sheep Association: | Represents c.7, 500 individual members, & 95 Breed Societies with 25,000+ members). |
| b) National Farmers Union: | Represents 55,000 members. |
| c) Livestock Auctioneers Association | Represents c.86 livestock markets in England and several independent livestock auctioneering companies. |
| d) British Meat Processors Association: | |
| e) Association of Independent Meat Suppliers: | Together represent the sheep and goat slaughter and processing sector covering large and small abattoirs and the ethnic trade |
| f) Country Land & Business Association: | Represents 38,000 land managers and rural businesses. |
| g) British Goat Society: | |
| h) Goat veterinary Society: | Together represent the interest of goat producers and veterinarians |

8. Other stakeholders consulted included, delivery partner organisations, animal identity manufacturers, rare breed societies, transport organisations, veterinary societies, enforcement bodies; livestock show organisers, retail organisations and welfare bodies.

Responses

9. 134 responses were received via the Defra consultation portal and emails from the following:

Industry bodies

National Sheep Association (NSA)
National Farmers Union (NFU)
Livestock Auctioneers Association (LAA)
Association of Independent Meat Suppliers (AIMS)
British Meat Processors Association (BMPA)
Country Landowners and Business Association (CLA)
Goat Veterinary Society (GVS)
English Beef and Lamb Executive (EBLEX)
Tenant Farmers Association

Breed societies

Pygmy Goat Society
Kent Goat Club
British Angora Goat Society

Livestock Markets / Auctioneers

Frank Hill & Son (Auctioneers & Valuers) Ltd.

Abattoirs & Meat Wholesalers

Scottish Association of Meat Wholesalers
2 Sisters Red Meat

Partner Organisations

Trading Standards Institute (TSI)
Local Authorities National Animal Health and Welfare Panel
East of England Trading Standards Association Animal Health Group

Individual Local Authorities (LAs)

City of London
Kent County Council Trading Standards
Cheshire East Borough Trading Standards
Northumberland County Council

Animal Welfare Organisations

Anglican Society for the Welfare of Animals

Animal Identity Manufacturers

Nordic Star Ltd
Shearwell Data Ltd
StockTrace Ltd.
QuickTag Ltd

Other Organisations

British Wool Marketing Board
British Veterinary Society
North Yorkshire Smallholders Society
Quintet Milk Recording Club
Farm Animal Genetic Resources Committee

Individuals

78 individual sheep keepers
20 individual goat keepers
4 persons working with organisations, but responding in a personal capacity.

Overview of Responses

10. There were 133 responses to this consultation, including from all key sector bodies. Generally there was strong support for electronic movement reporting, support for EID tagging of lambs – but with notable differences of opinions between some sector stakeholders, and contrary opinions on the use of injectable transponders between the sheep and goat sectors. Twelve specific questions were raised in the consultation. Responses by key issue are summarised below:

A) *Electronic movement reporting*

11. Views were sought on the plan for markets, abattoirs, and collection/assembly centres to report electronically. Farmers would have the choice to report electronically or via a paper bureau with encouragement to try the e-reporting system in line with the government's digital by default strategy. Strong support was received for those proposals. Consultees also agreed that keepers should be able to use the new system to keep (voluntary) electronic holding registers, and over time the system and its underpinning database could be used to offer (industry developed) service of commercial benefit to farmers.
12. It was proposed that premises reporting electronically should do so within 24 hours of a move completing. 41% agreed and 50% disagreed. A few respondents said this may dissuade farmers from trying e-reporting. Some said we should remain consistent with cattle and pig keepers who report electronically and leave this deadline at the current 72 hours (3 days).

Electronic tag for slaughter lambs

Views were sought on mandating the use of the EID slaughter tag only for these lambs. This would underpin e-reporting, deliver simpler tagging options and improve compliance with the requirement to record different flock marks in mixed batches. It would align the operation of the slaughter lamb derogation (double tagging) with the direction of travel (electronic) across the rest of the UK.

13. Most respondents did not disagree with the rationale for this proposal (47% for / 31% against/ 22% don't know/no interest)). Market and abattoir bodies were strongly in favour. Farmer bodies preferred to maintain the status quo and retain the choice of non-electronic and electronic tags. They were pragmatic about the use of the EID slaughter tag for mixed origin batches e.g. for moves through markets. They wanted to retain the non-electronic tag for moves direct from holdings of birth to abattoirs (no mixed flock marks). If the EID slaughter tag was mandated then in order to provide benefits to farmers to offset additional tag costs, they sought the following: (i) reconsider a tolerance of EID record keeping errors in holding registers, (ii) progress with delivery of the Farming Regulation Task Force livestock movement recommendations, and (iii) mandatory reporting of performance data by abattoirs to producers.
14. Markets also had concerns about proposal for EID slaughter tags in non-mixed batches of slaughter lambs having to be scanned as well as those in mixed batches. However this underpins e-reporting and performance recording by abattoirs.
15. Comments were also received on tagging, the costs of gathering animals and reading (scanning) their tags. These are addressed in revised impact assessments.

B) *Injectable identifiers*

16. There was a moderate majority in favour of allowing these identifiers on a voluntary basis for non-food chain goats and sheep. Sheep sector bodies however were ambivalent, and auctioneers and abattoirs were strongly against this proposal. Goat sector bodies however were strongly in favour. Most respondents agreed that if permitted they should be implanted by trained/competent personnel, and that animals so identified should have an ear tag of a specific colour as a visual identifier.

Responses to the questions in the consultation

17. Chapters 3, 4 and 5 of the consultation document raised a number of specific questions on which we sought answers in order to shape the legislation. There were 12 questions in total; of which 7 related to the management of the new electronic reporting system, 1 covered the EID slaughter tag with 4 on the EID injectable identifier.
18. The responses are summarised below. Some respondents did not answer all questions and a significant number of replies did not include any comments to explain the reason behind the choice of response.

Q1. Do you agree that only markets, abattoirs, collection and assembly centres should be required to report moves of sheep/goats/deer through their premises electronically?

Responses: 133	Agree: 89	Disagree: 36	Don't Know: 5	No interest: 3
	67%	27%	6%	

19. The majority agreed that these premises should report movements of these animals electronically. This would immediately capture around 70% of sheep, goat and deer movements reported each year. There was unanimous agreement to this approach from the main industry bodies representing markets and abattoirs (LAA, AIMS and BMPA) and individual market/abattoirs organisations who responded to this question. The LAA and a market operator believed that over time, farmers should also report all movements electronically. This view was echoed by one of the tag manufacturers, a market operator and a few keepers. Local Authorities agreed with the question but noted that low throughput slaughterhouses did not yet have the equipment to electronically read animals. Organisations representing farmers agreed this was a sensible proposal.
20. The NSA commented that the cost of the systems to report electronically should be proportionate and training was appropriate to enable this function to happen smoothly. The NFU thought that shows, fairs and other events of a temporary nature should be exempt from electronic reporting (they are). They also suggested read rates through Central Point Recording Centres (CPRCs) be published to help monitor and improve the accuracy of the numbers read through those premises. The NFU also advised that the opportunity for abattoirs to use the electronically read information to feedback carcass data to farmers would be welcomed. In relation to enforcement, TSI commented that accurate information, correct use of CPHs and clear enforcement rules on failure to comply with electronic reporting was required for the system to work efficiently. The overall response was therefore very positive on this proposal.

Q2. Do you agree that *farmers* should be allowed the option to continue to report moves on paper whilst being encouraged to use (voluntarily) the e-reporting system?

Responses: 133	Agree: 122	Disagree: 10	Don't Know: 0	No interest: 1
	92%	7%	1%	

21. A significant majority agreed that farmers should retain the option to report moves by paper.
22. All industry bodies and LAs agreed with this approach explaining that some farmers do not own a computer or have the necessary IT skills to undertake electronic reporting. It was also pointed out that many rural areas had unreliable access to broadband making it difficult to report movements quickly and efficiently. It was noted that whilst the provision for paper reporting should remain, there should be encouragement for farmers to use the electronic system with livestock market representatives proposing that in around five years this should be the default option. The low number who disagreed did so mainly because they considered there should only be one method of reporting movements.

Q3. Do you agree that markets, abattoirs and collection centres *and* any farmers who choose to report moves to their premises by the electronic route must report those moves within 24 hours of the move being completed?

Responses: 132	Agree: 55	Disagree: 66	Don't Know: 8	No interest: 3
	42%	50%	8%	

23. Industry bodies with the exception of AIMS (subject to force majeure exemptions) concluded that it was preferable to retain the 72 hours (three days) requirement to report all moves – electronic as well as paper. This was to ensure that a consistent approach was used when reporting any sheep movement. It was also noted that the current three days to report sheep moves also applied to cattle and pigs and to avoid any confusion it was recommended that there was no change to this rule. The Trading Standards Institute (TSI) agreed with this conclusion but three LAs thought that electronic movements should be reduced to 24 hours. East Cheshire reasoned that as an electronic system was intended to improve traceability in the event a disease outbreak, then rapid reporting would be vital in providing the most up-to-date movement information. The majority who agreed with this proposal were individual keepers but they did not comment on their reasons.

Q4. Do you agree that markets, abattoirs, collection and assembly centres should be mandated to scan/report the full ID number encoded in a slaughter animal's EID tag?

Responses: 132	Agree: 86	Disagree: 27	Don't Know: 11	No interest: 8
	65%	21%	14%	

24. The majority were in agreement. Industry bodies representing farmers believed that this approach would help offset the cost of a move to EID tags for all slaughter lambs e.g. by allowing purchasers to more easily upgrade lambs to retain past 12 months of age for breeding stock (i.e. changing an animal from a single tag to double tags +individual number available to do so). Also, it was acknowledged that receiving carcass information back from abattoirs will be facilitated by EIUD tags. LAs and TSI also agreed with this proposal as it would offer greater accuracy and traceability for movements of these animals. The LAA and BMPA however were concerned this action would increase costs to their members.

Q5. Do you agree that it makes sense for the new movement reporting system/database to be used to offer keepers commercial services of benefit to their business?

Responses: 132	Agree: 74	Disagree: 28	Don't Know: 23	No interest: 7
	56%	21%	23%	

25. There was cautious agreement that the opportunity to provide commercial information using the system would be helpful to producers. Concerns were raised by some industry bodies and individuals in general that both the primary function of the system (movement reporting) and any commercial services provided must respect Data Protection rules. Comments from some who disagreed/didn't know, were that the provision of management information to producers should only be offered through a separate commercial service.

Q6. Do you agree that, keepers should have the opportunity to use the new movement reporting system/database as a means of keeping an electronic holding register?

Responses: 132	Agree: 106	Disagree: 12	Don't Know: 12	No interest: 2
	80%	9%	11%	

26. There was general agreement to this proposal. Industry bodies representing farmers stressed this should be a free and optional and not a requirement (that was the proposal). They also suggested that access to these electronic holding registers by enforcers should be on request and with knowledge of the farmer. TSI mentioned that it should be clearly identified who has responsibility for the correct information in this type of register. Tag manufacturers thought the uptake of the electronic register would depend on whether the farmer who had the responsibility for the register was able to edit/correct information entered by others (they will). The majority of responses entered for disagreed/don't know did not provide any comments.

Q7. Do you agree that, slaughter lamb producers who decide to *single tag* their lambs should be required to identify lambs with the single EID tag *only*?

Responses: 133	Agree: 63	Disagree: 41	Don't Know: 12	No interest: 17
	47%	31%	22%	

27. Respondents were split on this issue. The market and abattoir organisations were strongly in favour and viewed the EID slaughter tag as essential so their members could electronically report all sheep movements. One abattoir advised they could rapidly read EID'd slaughter lambs and return carcass information to their producers. They found the main challenge to their operation and traceability arose from lambs identified with non-electronic tags. Markets believed only one type of identification for slaughter lambs should be permitted. This would simplify the current slaughter lambs identification rules which they believed were confusing, enable them to operate one recording/reporting system (regardless of whether the destination was a market or abattoir) and allow the efficient and rapid reading of the lambs as they moved through the markets. LAs and TSI also agreed the proposal, both on the grounds of improved traceability and greater flexibility in upgrading slaughter to ewe lambs.

28. Most opposition to this proposal came from the organisations representing sheep farmers - NFU, NSA, CLA and TFA. Their main concern was the higher cost of an EID slaughter tag as compared to the non-EID tag. NSA and CLA understood the rationale behind permitting just the use of the EID slaughter tag but only supported this proposal if a number of policy actions were delivered by Defra. These included delayed introduction to allow farmers to use up stock of the non-EID tags; a review of the 6 day standstill rule and adoption of a CPH 10 mile rule (Farming Regulation Task Force recommendations). Together with the NFU they wanted to see progress made on the negotiating an EU record keeping of incomplete EID tag numbers in keepers holding registers including when they were using tag reading data provided by third parties such as Central Point Recording Centres' (CPRC). Their concern was to mitigate the risk of cross-compliance fines. Of 78 sheep farmers who responded 34 said 'don't know'/no interest', 28 agreed and 34 disagreed (on grounds of cost).

Q8. Do you agree that with simplicity in mind it would also make sense to align the operation of the slaughter lamb derogation within the GB Devolved Administrations?

Responses: 132	Agree: 61	Disagree: 19	Don't Know: 37	No interest: 15
	46%	15%	39%	

29. There were a limited number of comments provided in response to this question. Market + abattoir representatives and LAs +TSI agreed that it would make sense to have one GB-wide approach for slaughter lamb ID and a harmonised approach to their movement reporting. Farming representatives were not persuaded of the benefits accruing from aligning the rules (i.e. losing the non-EID tag). The NSA, NFU and CLA believed a restricted derogation (i.e. allowing that tag for moves direct to slaughter from holdings of birth) would work equally as well as the single EID slaughter tag only approach. They believed that if the systems were aligned then work should be undertaken to deliver other policy activities (see previous paragraph).

Q9. 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 an injectable)?

Responses: 132	Agree: 64	Disagree: 52	Don't Know: 11	No interest: 5
	49%	39%	12%	

30. The goat sector was particularly in favour of EID injectables, mainly on the grounds of welfare (reducing damage which could be caused by ear tags). The British Angora Society thought this should be a voluntary option and mentioned that with correct tagging and management tag loss and post tag infections were rare. The Goat Veterinary Society advised that the possible use of injectables had been well received by the goat keeping fraternity. They agreed that animals identified with an injectable should be prohibited from entering the food chain and should therefore not be sent for slaughter (see Q10). The 78 Individual sheep keepers who responded had a lukewarm response to the proposal (33 disagreed, 32 agreed and 13 don't know/no interest). This compared to the positive response from the individual goat keepers, where 19 out of 21 were strongly supportive of the option to use injectables. The organisations representing sheep farmers were against this proposal (with the exception of the CLA). The NFU advised that after consulting widely with members; farmers were concerned about transponder retrieval and did not believe they should be permitted in sheep. The market and abattoir organisations also opposed the use of injectables for the same reasons.

Q10. 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?

Responses: 132	Agree: 51	Disagree: 52	Don't Know: 22	No interest: 7
	49%	39%	22%	

31. There was overall agreement that animals identified with an injectable should not go into the food chain. The respondents who did not support this proposal were comprised of organisations representing sheep farmers, abattoirs, and markets and TSI. Their view was injectables should not be permitted as it was impossible to ensure these animals did not enter the food chain. Concerns were that the transponders could migrate and make it difficult for abattoirs to retrieve the devices which could then end up in the food chain.

Q11. Do you agree that injectable transponders need not be applied by vets but they should, as a minimum be implanted by trained and competent personnel?

Responses: 132	Agree: 90	Disagree: 28	Don't Know: 7	No interest: 7
	68%	21%	11%	

32. There was broad agreement to this question. Abattoir and market sectors along with the NSA did not support the premise of the question as they were opposed to the use of EID injectables. There were mixed views from other respondents who did not agree, ranging from: only vets should be permitted to implant injectables, to farmers were competent to undertake this procedure and additional training represented more unnecessary costs to their business.

Q12. Do you agree that the reserved tag colour to be used when an implant has been applied should be purple?

Responses: 132	Agree: 51	Disagree: 37	Don't Know: 24	No interest: 20
	38%	28%	33%	

The main area of concern here was the loss of another tag colour for farmers to use for management purposes. NFU suggested the colour should be black (as for use of an EID bolus). TSI suggested the letters "IN" should be printed on the tag. Industry bodies (as with previous questions) disagreed as they were not in favour of injectables being permitted to identify livestock.

What Defra is doing following the consultation

Electronic reporting of sheep, goat and deer movements – April 2014

34. This will be introduced from April 2014. It will be delivered via a new Animal Reporting and Movements Service (ARAMS) delivered under contract to Defra by SouthWestern Business Process Service (UK) Ltd. Markets, abattoirs and collection and assembly centres will be required by law to report movements of all sheep through their premises electronically via the ARAMS database. They will also need to report individually all movements of electronically identified animals through their premises. Farmers can choose to report electronically and will be encouraged and supported to do so. Alternatively they can continue to report by paper through a new paper bureau service managed by SouthWestern. A free web portal will be available to allow farmers and small businesses who do not have computerised back office systems to report electronically to the ARAMS database. Farm management software packages will also be able to connect to the database. Most markets and many abattoirs will directly connect to the database via their back office computer systems.

Time to report movements – no change

35. The time allowed to report all types of sheep; goat and deer movements (electronic and paper) will remain at 72 hours (three days).

Electronic identification of all slaughter lambs – January 2015

36. Only the electronic slaughter tag will be permitted as the single tag option to identify slaughter lambs. This will be introduced from January 2015 to allow farmers to use up existing stock of the non-electronic slaughter tag for the 2014 lamb crop.

EID Injectables – from April 2014

37. Their use will be permitted from April 2014 but keepers will not be able to use them until an animal ID supplier has submitted one for testing and approval for use as an official identifier¹. Their use will then be subject to the following strict conditions:
- EID injectables will only be permitted for goats.
 - They must be applied in the groin – by a trained/competent person.
 - The match-up ear tag must be black and (as well as the individual ID number) printed with the letter “I” for injectable. (If an EID bolus is applied from this date then the black tag will be printed with the letter “B”).
 - Goats identified with an injectable must not enter the food chain.

Electronic Holding Registers

38. These will be made available in the new system. Keepers will remain responsible for the accuracy of the information in their holding registers and will be able to edit/correct information in an electronic register should they choose to use one. Movement data provided through the new ARAMS system to the Government's Animal Movements Licensing System (AMLS) is no different to that which already exists on AMLS to which Defra and its enforcement agencies already have access

¹ [Web link to the Rural Payments Agency web page for sheep & goat ID suppliers](#)

Further communications throughout 2014

39. Industry organisations and enforcement bodies are being consulted during the development and roll-out of the new ARAMS e-reporting system. Posters and leaflets have been circulated to businesses handling sheep and goats and advisory notices and information articles will be published in the farming press. Revised guidance will be sent to all registered sheep and goat keepers by Defra.
40. Further information is on the ARAMS website: www.arams.co.uk.