



Llywodraeth Cymru  
Welsh Government

## Welsh Government

### Consultation – summary of response

#### Changes to livestock identification, registration and movement reporting



March 2022

## **1.0 Background information**

In December 2018, the Minister for Environment, Energy and Rural Affairs announced her intention to extend EIDCymru and develop Wales' first multispecies traceability system and service. This announcement gave an opportunity to look at the existing livestock policy rules and how they could be simplified and since then, Welsh Government policy officials have worked with stakeholders to develop proposals. The consultation detailing these proposals, closed on 2 January 2022 and it asked wider industry for their views on the proposed changes to the current registration and movement reporting processes for sheep, goats, cattle and pigs together with the proposed implementation of Bovine Electronic Identification (Bovine EID).

Bovine EID will require cattle to be electronically identified with an ear tag containing an electronic chip. This is one of the permitted forms of bovine identification under current domestic legislation.

Powers under the (UK) Agriculture Act 2020 provide the Welsh Ministers with the ability to dis-apply certain legislative provisions concerning the identification and registration of bovine animals, and that of ovine and caprine animals. Upon the dis-application of such legislation, the Animal Health Act 1981 provides the Welsh Ministers with the power to make legislation in its place.

Ministers in all the UK administrations recognise the importance of cross-border trade and we are working closely with them to align proposals where possible, and ensure all movement systems in each administration work together.

## **2.0 The consultation process**

The Minister for Rural Affairs and North Wales and Trefnydd launched the consultation on 30 September 2021 until 2 January 2022.

The proposals have been developed following extensive engagement with the wider agricultural industry and in conjunction with internal stakeholders and external industry representatives through the Livestock Identification Advisory Group (LIDAG).

The consultation document was published on the Welsh Government's consultation website and hard copies were sent out to all livestock markets and abattoirs, union head offices and Wales YFC.

## **3.0 The consultation proposals and questions**

The policy proposals included in the consultation were:

- Mandatory whole movement reporting – departure and destination County Parish Holdings (CPH) to be reported on all movements for all livestock (change for cattle reporting)

- Mandatory completion of journey information of all movements for all species
- Mandatory same day movement reporting for Central Point Recording Centres (CPRCs)
- Voluntary pre-movement reporting – livestock movements can be reported before animals leave the departure holding (all species)
- Voluntary potential for paperless movements and registration when coupled with pre-movement reporting.
- Voluntary use of an online herd/flock register facility for all species
- Voluntary changes to show and event movements – development of a circular movement reporting process for all species moving to & from showgrounds
- Gathering of views on the long term vision for improved pig identification and traceability

The consultation did not seek views on the decision to extend EIDCymru into a multispecies service, nor did it ask for views on the livestock registration and movement systems and services in current use.

#### **4.0 Responses to the consultation**

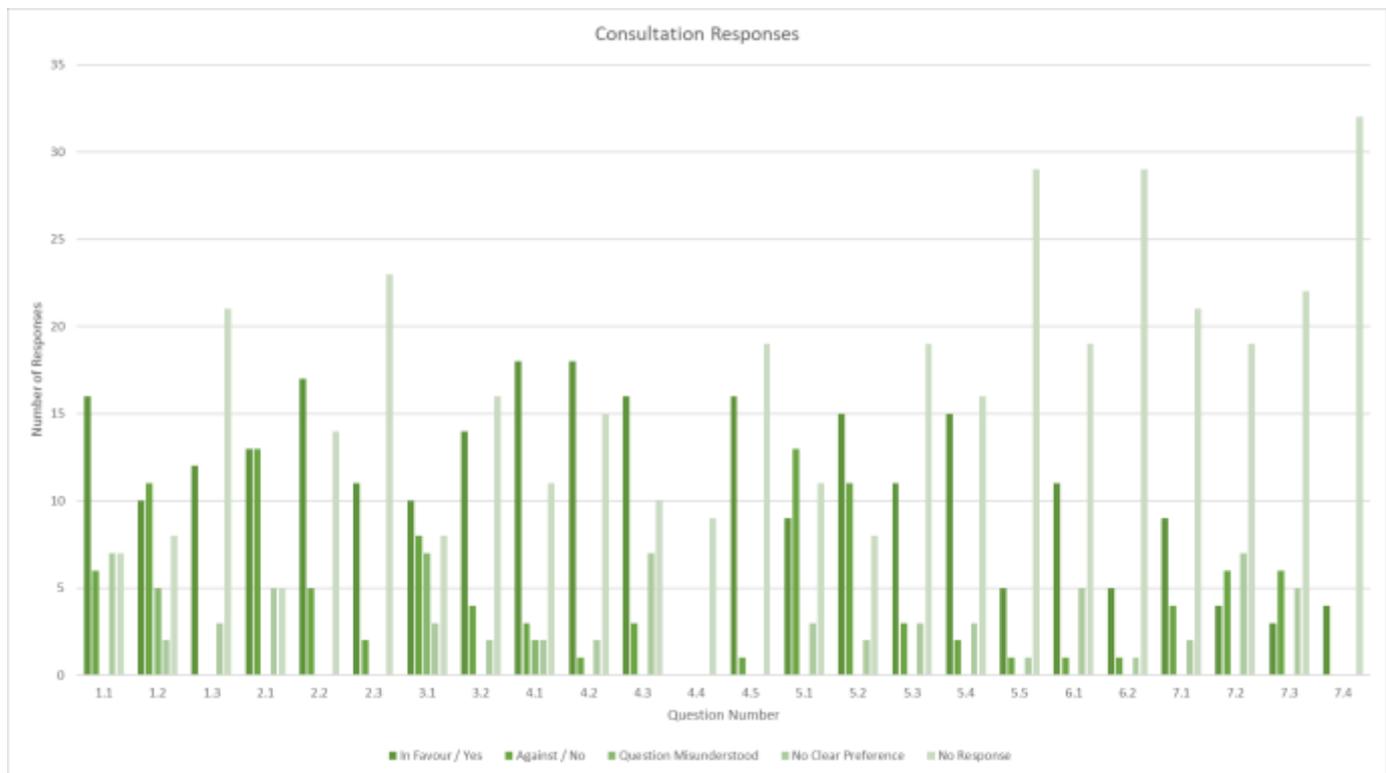
The Welsh Government received 36 written responses from a range of organisations and individuals, which are listed at Annex A. During the consultation period, policy officials engaged with a cross section of the industry on a number of visits, virtual meetings and discussions held at the Royal Welsh Winter Fair.

Sixteen respondents asked that their personal details are not published.

Not every responder answered every question in the consultation document and a there was a response rate of 55% to questions included in this consultation. This is due to the consultation covering all livestock and not all questions would be applicable for the respondents.

The table and graph below details the summarised responses.

Consultation Proposals		In Favour / Yes	Against / No	Question Misunderstood	No Clear Preference	No Response
Whole Movement Reporting		16	6		7	7
Journey & Transport Information		13	13		5	5
Same Day Reporting for CPRCs		10	8	7	3	8
Pre-movement Reporting	Paper Passport Required	18	3	2	2	11
Pre-movement Reporting	Paper AML1 Required	18	1		2	15
Pre-movement Reporting	More Digital Services	16	3		7	10
Electronic Reporting	Online Holding Register	9	13		3	11
Electronic Reporting	Paperless Reporting	15	11		2	8
Electronic Reporting	Paper Registrations	11	3		3	19
Electronic Reporting	Birth Registration Alignment	15	2		3	16
Circular Show Moves		11	1		5	19
Pig Traceability	Annual Inventory & Holding Registration	9	4		2	21



**Table 1.** Breakdown of the type of respondent

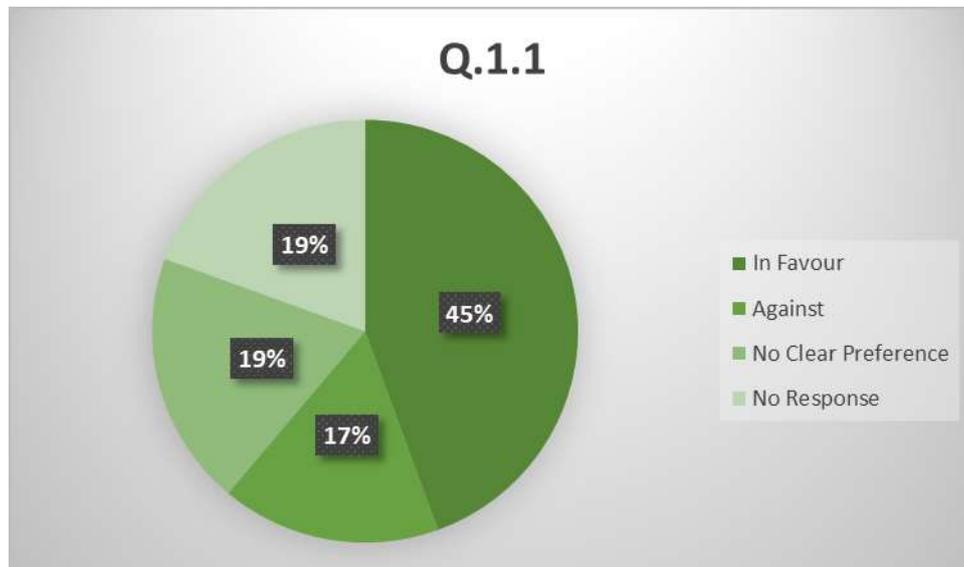
Respondee Type	Number
Individual	19
Organisation	14
Unknown	3
<b>Total</b>	<b>36</b>

## 5.0 Consultation responses

### Section 1 – Mandatory whole movement reporting

Whole movement reporting is when both the departure and destination CPHs are recorded on all movement reports for all livestock.

16 respondents were in favour, 6 were against and 7 had no clear preference.



Some of the responses to this question are detailed below:

- This is a more efficient way of recording cattle movements, mirroring the existing electronic reporting system for sheep, goats and pigs. Much of the required information to support this is already held on livestock market systems and therefore would be manageable to implement, provided that the destination CPH given by buyer is correct'.
- Provision for the departure CPH and destination CPH to alter the movement details is essential. It should be mandatory for all destination CPH's to confirm and accept or alter the movement, within a realistic time period.
- Cattle keepers expressed their concerns with providing the information required for a whole movement report due to the added administrative burden. Keepers who keep sheep and cattle did not object to the suggestion for both departure and destination CPH to be reported when moving cattle as they

were familiar with providing such information on current AML1 sheep movement forms’.

- It should always be feasible to provide a destination CPH, the question is whether this is invariably correct.
- On the whole members saw this as a positive move but also pointed out that they would not want to see a system that saw dramatic changes to the format of cattle movement recording. The recording of the destination holding will be beneficial in traceability terms.

Whilst the majority were in favour of whole movement reporting, respondents were able to provide us with some situations and scenarios when it may be difficult to record the destination CPH. These included:

- When in an emergency situation e.g. moving cattle away from flash flood/ and the CPH is unknown.
- When selling livestock through a livestock dealer i.e. where the animals are moved directly from the seller’s holding to the purchaser’s holding, but with the sale having been organised through a dealer.
- Selling to keepers with more than one holding number. It is essential therefore that the seller of the livestock knows which holding the animals are being sent to.
- Several respondents questioned the availability of CPH information with others requesting the publication of CPHs for keepers and CPRC’s or for the name and address to be used if the CPH was unknown.

The destination could change when the animals is in transit or on arrival and some respondents felt it should be mandatory for all destination CPH’s to confirm and accept or alter the movements. This function should be as simple as possible to reduce administrative burden and to encourage prompt responses.

## **WG Response**

The proposal to capture both the departure and destination CPH for all livestock movement reports was supported by the majority of respondents.

Sheep, goat and pig keepers already have to report both CPHs when moving animals therefore we propose to introduce this for cattle too.

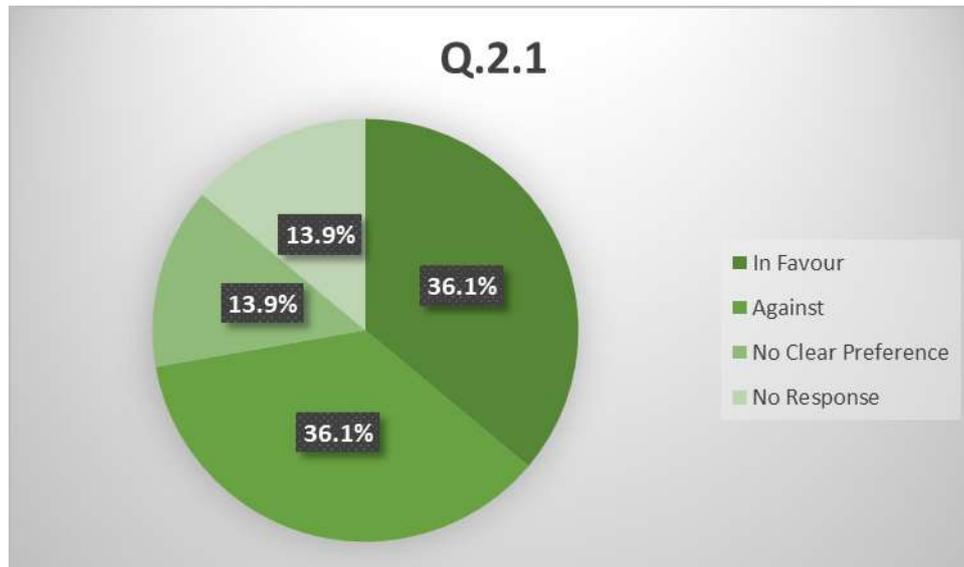
We do appreciate there are some emergency situations where it might not be possible to locate the CPH and these will be considered on an individual basis. We would encourage all keepers for the other circumstances to contact the destination and ask for the correct CPH before the animals move.

We propose for this amendment to be phased in and implemented on a voluntary basis from the launch of cattle on EIDCymru before becoming a mandatory requirement.

## Section 2 – Mandatory journey information for all livestock

### Mandatory recording of journey and transport information on all movement reporting for all species

13 respondents were in favour, 13 were against and 5 had no clear preference.



A selection of the responses received is as follows:

- For commercial hauliers, on a commercial basis, with mixed-origin animals then yes I support collection of those details. However this puts an unreasonable administrative burden on the sole keeper or friends helping out, with no benefit gained if all the travelling animals are going to and from the same locations.
- The ability to provide accurate information if we are not transporting the animals ourselves. We should only be asked to provide details we can realistically be able to give honest answers for.
- Supportive of this principle but 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.
- Haulier information is central to traceability – being on-site, hauliers know the exact loading and drop off points. Much of this information may already be recorded in haulier logs, so there may be an opportunity to join up existing datasets and avoid unnecessary duplication. They also suggested asking for

vehicle washing details may improve biosecurity between loads, especially if used to carry different species.

- All processors have to collect evidence of the transportation details for every consignment/beast they slaughter'. They would not have the resources to input this information into EIDCymru for every animal/consignment nor would they be willing to accept liability for any third party information which may be provided. To date, the electronic completion of journey details etc to replace the need for an AML1 has not been achieved for sheep.
- This will require additional work for cattle keepers and CPRCs but overall, it was felt that this will bring some clarity to movement reporting requirements across all species and up to the required WATO standards and would help in the event of disease outbreaks in terms of full traceability. Where cattle are picked up by a haulier where the keeper may not be present and may not know the exact departure time duration of the journey and registration of the vehicle. In such cases if that information is recorded by the haulier this should be sufficient.

### **WG Response**

There was a mixed response to the proposal for mandatory journey information recording for all livestock movements, and significant concerns and issues were raised on who would be responsible for capturing and inputting this information.

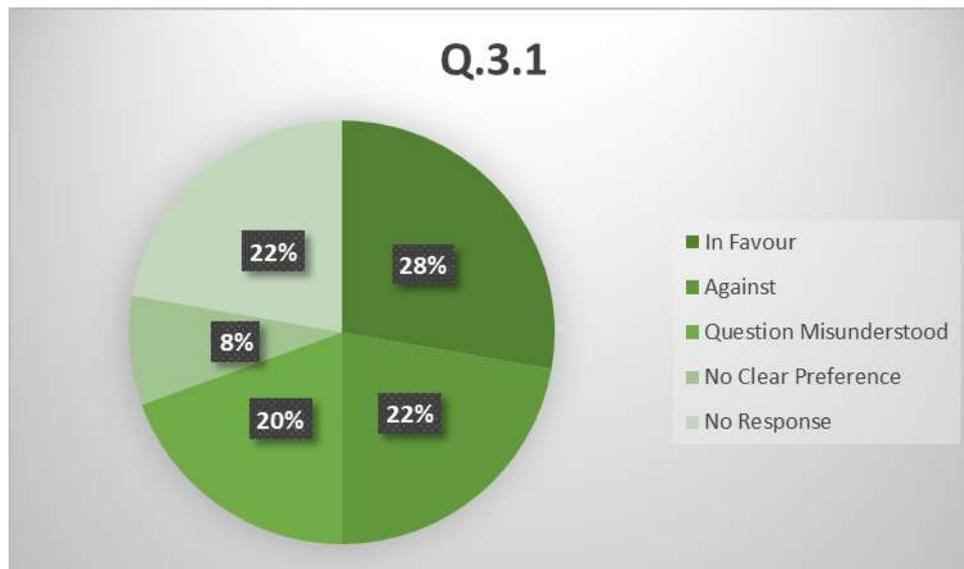
**It is important to note that this proposal does not change the transport information keepers are required to provide under the Welfare of Animals (Transport) (Wales) Order 2007.**

In light of the scenarios gathered from the consultation we will not be making this a mandatory requirement when reporting the movement. Instead we propose this is captured on EIDCymru on a voluntary basis from the launch of cattle on EIDCymru. We will continue to work with our Livestock Identification Advisory Group (LIDAG – Stakeholder advisory group) to determine the proposal in more detail and consider how this information could be collected electronically without creating added administrative burden for those parties involved.

## Section 3 – Mandatory change to CPRC reporting timescales

Mandatory same day reporting of all livestock movements to EIDCymru by CPRCs  
(No change to keeper reporting timescales)

10 respondents were in favour, 8 were against, 7 misunderstood the question asked and 3 had no clear preference.



There were varied responses to this section depending on how the respondents interpreted the question. A number of respondents misunderstood the question and thought the proposal was introducing same day reporting for all keepers rather than just for CPRCs.

A selection of the responses are as follows:

- Same day recording for movements through livestock markets (CPRCs) would be achievable, given the majority of movements for cattle, sheep and pigs are already reported at the end of the day. However they emphasised that this requirement is reliant on:
  - The correct information being received by CPRC's from the departure and destination CPH's
  - The provision to change and amend details on a real time basis must be in place.
- Livestock often do not leave before the end of the sale day following the time of movement reporting. Livestock often depart through the night or in the early hours of following morning. Clarification is needed from Welsh Government on definition of "same day reporting" in these circumstances. They have suggested 'a pre-movement notification facility that allows for the livestock

market (CPRC) to report the movement for livestock departing outside of office hours on the day of, or on the following days, of transaction would largely mitigate the issue raised above.

- Agrees with this in principle, we are uncertain as to whether it will be possible especially where auctions operate multiple sales during a day, and some operate night sales. Allowance needs to be made for loss of power, internet, and some sales may be conducted away from the auction yard and little or no connection.
- Support same day reporting, as this would improve traceability and enable quicker action in the control of disease outbreaks. 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.
- Same day reporting from such centres should improve the timeliness of disease tracing in the event of an outbreak and/or reduce the scale of movement restrictions imposed subsequently.
- 'Same-day' reporting as detailed would be an impractical situation for those involved with the administration within CPRCs'. They suggested 'allowing movements to be reported by CPRCs within 24hours of arrival would be a more balanced requirement. The effects this could have on smaller livestock markets who would be put under increased administrative burden. Assurances are also sought that these changes would not also be applied to agricultural holdings as these requirements would be impractical for most farming businesses. Clarification of how these changes would correspond with cross-border CPRCs and whether the specified time limits would also apply for them for movements originating from Wales.

## **WG Response**

The consultation response data does show support for this policy proposal, despite a number of the respondents interpreting this policy proposal to cover all livestock movement reporting to CPRCs. The policy intention of this proposal is only for the livestock movement reporting carried out by CPRCs (markets, abattoir, collection and assembly centres). We do not propose to reduce the livestock movement reporting times for keepers from 3 days, regardless of if they are moving to another farm or market/abattoir.

Although any proposed changes to the reporting timescales will only apply to markets, abattoirs, collection and assembly centre premises situated in Wales, Welsh Government officials are working closely with UK Government and Scottish ~Government to ensure policy alignment where possible.

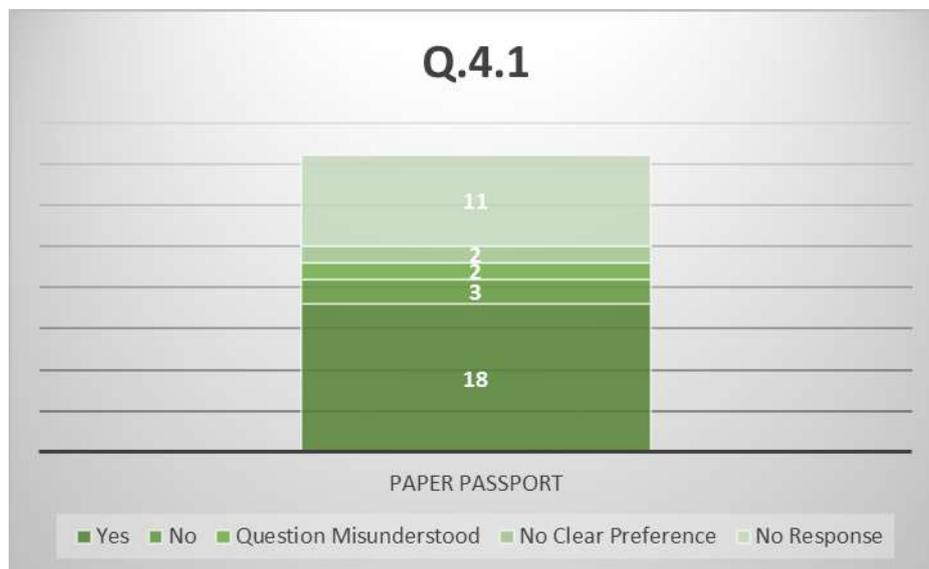
Many of the responses that showed support for this proposal suggested that 24 hour reporting would be more achievable for this policy aim. Therefore we intend to bring this proposal into force for CPRCs with a 24 hour reporting deadline rather than the same day. We will work with markets, abattoirs, collection and assembly centres throughout the change.

## Section 4 – Voluntary pre-movement reporting for all livestock

Pre-movement reporting is when all movements are reported before animals leave the departure holding instead of up to 3 days following the move

### 4.1 Are there any situations where the current paper passport is still required?

50% respondents said Yes, 8% said No, we believe 6% misunderstood the question and 6% had no clear preference. Those who answered the question based on the current rules were classified as misunderstanding the question because it was asking about future requirements.



The majority of individuals agreed that there were situations where the current paper passport is still required with the reasons given summarised below:

- To provide evidence of the move if travelling and stopped by the authorities
- There are a number of farmers that have no internet connection or computer
- A quick reference in the office, or quick inspections, or information confirmation during power outages, and as a back-up for computer systems failures
- Beneficial to on farm record keeping.

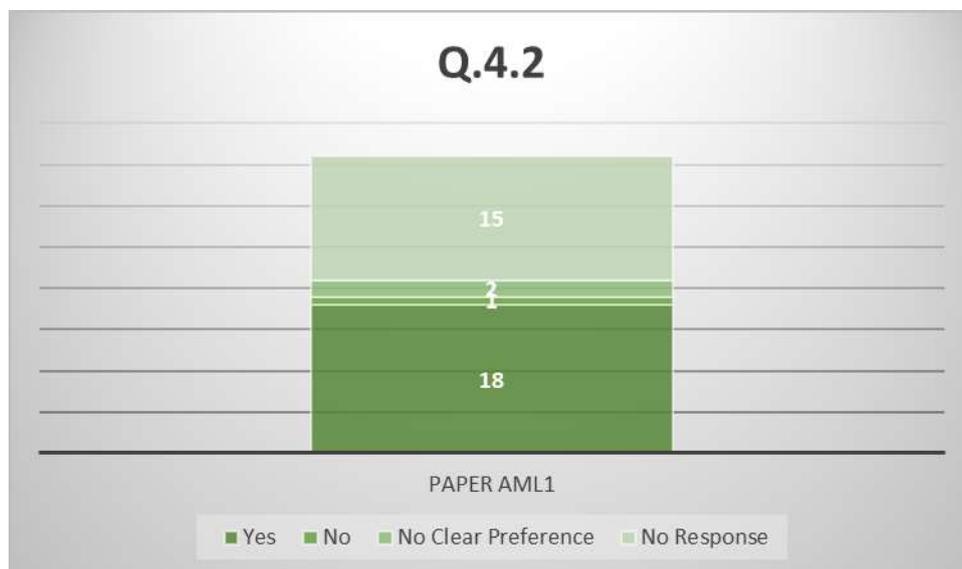
A selection of the responses are as follows:

- Paper cattle passport can be dispensed with, just have electronic copy
- The presence of the paper option actually seems to cause more confusion
- Fully support the provision of having the option to complete paper passports. A system based entirely online will face issues such as providing proof of ownership when transporting livestock, theft and cross border interaction
- The safety and reliability of containing all information online and access to reliable digital connectivity across the whole of Wales for all livestock keepers

- Paper passports should be used during the transitional period until EID is fully in place
- Current passports carry a lot of additional information, critical to the supply chain and the animals value, which can be automatically scanned from the bar code. Before passports can be removed it is essential to have a thorough understanding of the role these play in current business practices for all operators in the supply chain. For those farmers who are not digitally enabled the passport is the only way of tracking an animal's movements
- Suggest that the new database needs to be up and running and fully bedded in before consideration is given to doing away with the current paper passport
- There were situations for paper passports due to 'a large proportion of rural communities are still unable to operate with a reliable internet connection and many having no option than to use paper passports due no signal at all However, with the progression for the ability to be completed online, this will give the long term potential to use paperless movement reporting. As this is a procedure that is already carried out on the paper passports, there then wouldn't be any extra burden to fill out the details as keepers are already accustomed to doing this by paper means.

#### 4.2 Are there any situations where the current paper AML1 is still required?

50% respondents said Yes, 3% said No and 6% had no clear preference.

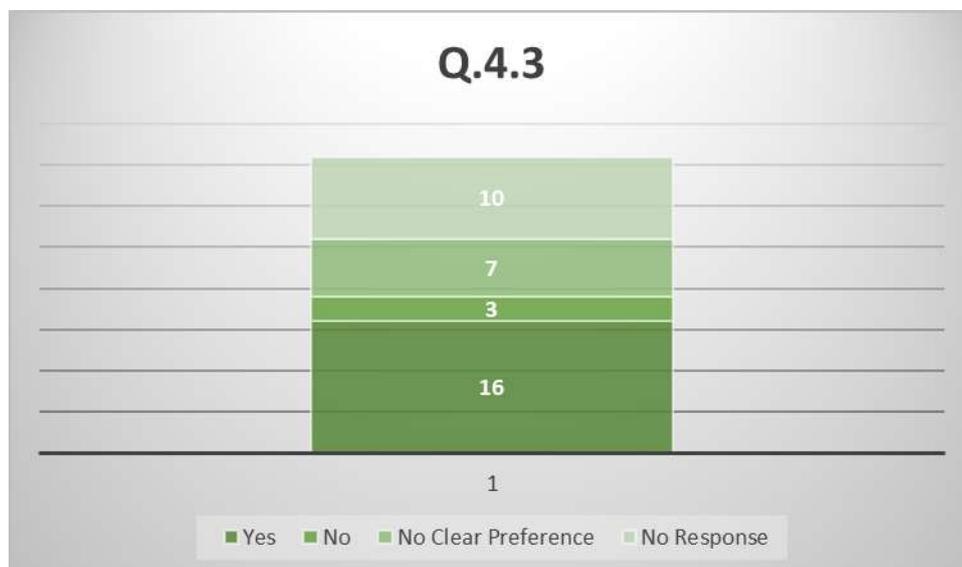


A selection of the responses are as follows:

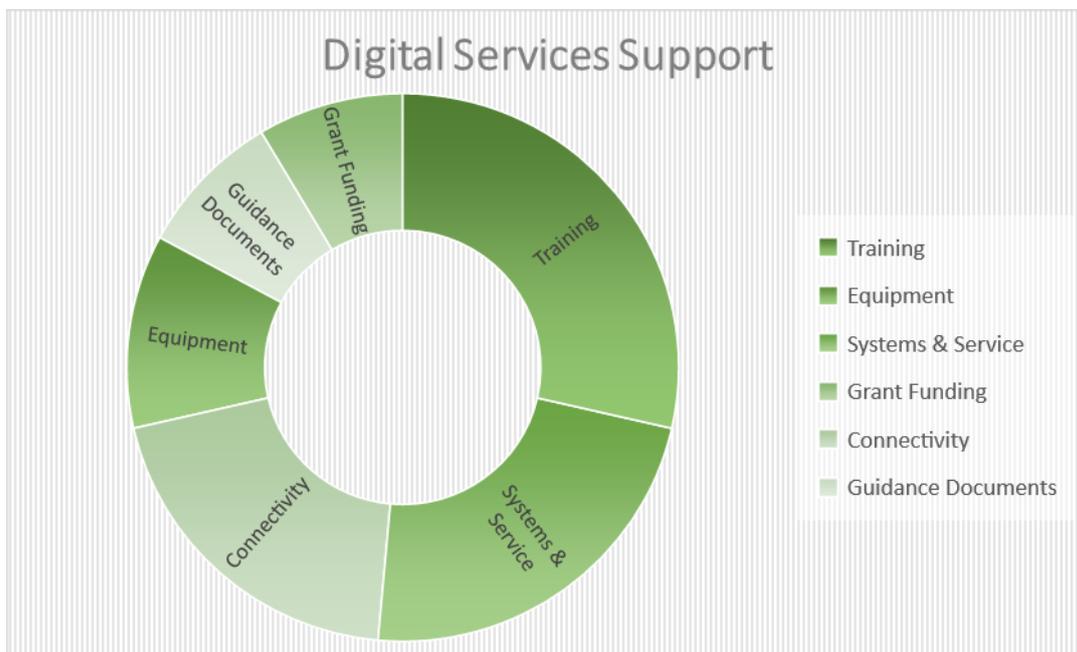
- There were situations where the current AML1 form is required and gave examples of all markets, abattoirs and inspecting bodies requiring them to check holding numbers for movements.
- AML1 allows for last minute injuries or illness to be captured before animals are loaded, at a point where internet connection may be lacking, and time is limited'
- Non-digitally enabled keepers still use the AML1 form for moving animals and collecting details of the holding of origin. They highlighted 'It is also used to confirm that farmers and hauliers have the right to transport the animals instead of filling out a separate Animal Transport Certificate'.
- As a lamb processor, we only use the AML1 as a second FCI check, to validate the departure CPH for all consignments and the duration of the journey. We do not need the AML1 for any other purpose'.
- Even if we do move to a fully electronic system there are distinct advantages of having the option of a paper record for convenience at remote livestock markets for example'. They suggested 'an easily printable paper form in events of power or IT failure otherwise trading of livestock would come to a stop which would be totally unacceptable business wise but also from an animal welfare point of view'.
- The use of a paper AML1 document for the movement of sheep and/or goats enables those transporting to prove the genuine authorised movement of the animals. The removal of the document could also make it harder for authorities to lead enquires in the event of unauthorised or illegal movements of animals'.

#### 4.3 Would you welcome the use of more digital services? What do you require in order to do this?

44% respondents said Yes, 8% said No and 19% had no clear preference.



In general there was good support for the use of more digital services but the concerns surrounding rural connectivity, computer literacy and digital infrastructure within the agricultural industry in Wales, were shared by the majority of respondents.



The second part of this consultation question asked what the industry would require to allow them to use more digital services. The chart above shows types of support the respondents suggested. Training, Connectivity and 'fit for purpose' systems and supporting services were the most common responses.

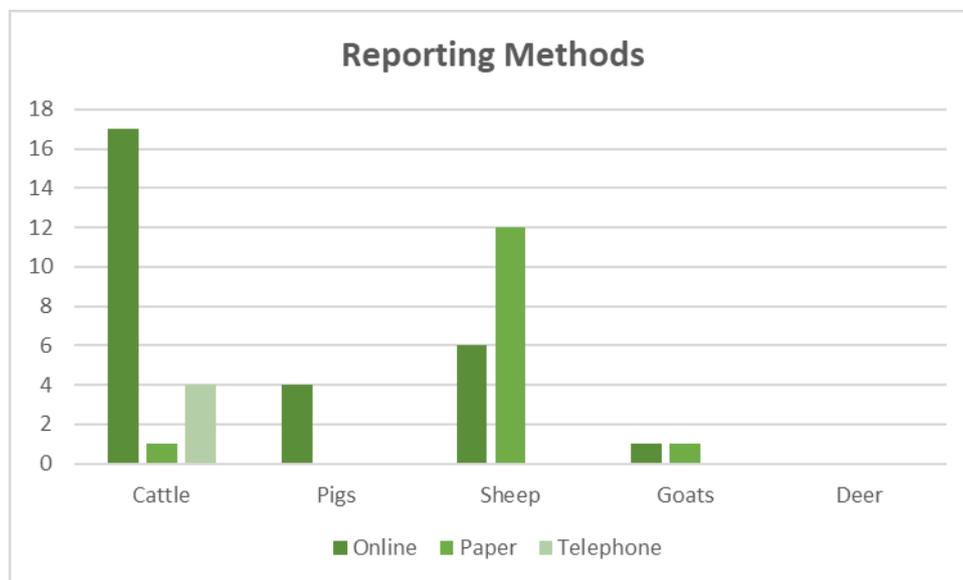
A selection of the responses are as follows:

- They required the systems to be fit for purpose. They are currently poorly designed and amateurish in appearance. They are certainly not clear to use as a 'one size fits all approach' creates genuine confusion amongst many smallholders
- The forms could be dramatically simplified together with better confirmation of completed steps and more email notifications as this would help clarify to new users and old alike, that they have correctly completed the process.
- Lack of connectivity is my main barrier to same-day anything. I am fortunate to be familiar with IT generally, but there are still farms I work with that have only a landline phone - no mobiles, no smartphones, no computers.
- Supports the use of more digital services as this will improve traceability and aid disease control.
- The use of more digital services and the potential benefits they can provide is cautiously welcomed, nevertheless, emphasis must be placed on the importance of retaining paper options alongside developing the digital platform.
- The use of digital services where it is reasonable, practical and time efficient. Inclusion of fallback measures within regulations is essential considering the variability of digital access across Wales due to coverage, reliability and accessibility. The introduction of any mandatory digital services could result in

added stress for individuals, and the risk of exclusion for some who would be unable to access such services. It would be essential that tailored and adequate personal training would be available at no-cost for those who wish to use the services. These extended to concerns on system access maybe dependant on 'their ability to afford and provide investment into technology required and note that financial assistance is essential to allow uptake of enhanced digital services.

- Rural connectivity will be a barrier for some with inadequate internet service or no signal at all. The average age of a Welsh farmer is 60 years old, where their IT skills may not be sufficient enough to carry out the proposals being put forward. The ability for livestock keepers to attend training sessions or funding towards computer equipment would need to be available for them to benefit from the ease of submitting information online.

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



25 of respondents were able to answer this question based on their circumstances. Of the consultation responses received, online was favoured as the preferred reporting method for cattle and pig movement reporting. Paper was shown to be the preferred method for sheep.

9 of the responses received were from respondents that report both cattle and sheep movements to CTS and EIDCymru. 7 out of the 9 respondents reported their cattle movements online and their sheep movements by paper. The reasons given for reporting their sheep movements by paper instead of online, were that they found it the easiest method as the paper AML1 document must travel with the animals. They also indicated system navigation issues, tag number input much more time consuming when completing movements online.

A selection of the responses are as follows:

- It fits in with the farm working day without extra expense.

- They use online farm management software to report their movements.
- Online reporting for some respondents, was reliant on a family member to carry out the online movement reporting on their behalf.
- The majority of cattle keepers complete their movements either by telephone or online themselves or via a third party agent such as their local union branch, with a small majority stating that they notify their cattle movements by post due to lack of digital connectivity. Sheep keepers on the whole report movements via the AML1 paper form but a small minority of members welcomed the proposal of allowing the electronic movement reporting of sheep via EIDCymru to be recognised as a valid form of recording given that currently, there is the requirement to duplicate work when using the electronic platform and completing the paper AML1 form to comply with regulation.
- Welcome the choices available to report movements as it provides flexibility. Should there be IT problems for example or no broadband connection, knowing other choices of movement reporting are available is important. What is important is that all movements are reported in a timely fashion and giving a choice increases significantly for all livestock keepers to have the ability to be able to do this 365 days a year.

### Voluntary Pre-movement Reporting Responses

There was no specific consultation question asking if the industry were in favour or against pre-movement reporting. However respondents were able to feedback their views within section four.

A selection of the responses are as follows:

- Intended pre-movement reports must be fully editable, cancelled or easily changed up until the animals arrive at the destination CPH, rather than the point when the animals leave the departure CPH. Pre-movement recording could be advantageous to livestock markets (CPRCs), notifying them in advance of expected livestock numbers arriving. The haulier and destination CPH should be allowed a realistic time period to input, accept and confirm or amend movement information.
- Movement and journey information could be captured 'If done on a pre movement basis and online but be editable. There needs to be a derogation included for say a power cut with no penalties incurred for late reporting.
- Pre-movement reporting could be an important tool in controlling disease and now is well established in eAML2 for pigs. It ought to be an all-in approach, as otherwise the result may be confusion and duplication if sending and receiving farmer set-up the same move.
- Extremely mixed views on the introduction of voluntary pre-movement reporting for all livestock. Clearly there are benefits to pre-movement reporting not least with informed purchasing on farm-to-farm movements. However, things happen, which may prevent individual animals or even whole moves happening as planned and the question has been rightly asked is the system currently robust enough to make changes to the pre-notification before the

animals leave the holding. Any changes would rely on an electronic report and herein lies the concern that with the patchy and sometimes unreliable broadband coverage is it really feasible?’

### **WG Response**

Whilst some consultation responses supported the proposal for voluntary pre-movement reporting for all livestock, significant concerns and issues were also raised on implementing this policy aim alongside the removal of paper cattle passports and AML1 sheep movement forms.

We propose for pre-movement functionality to be enabled on a voluntary basis when legislation allows and we will work with our Livestock Identification Advisory Group (LIDAG – Stakeholder advisory group) to consider how the proposal could be revised and progressed.

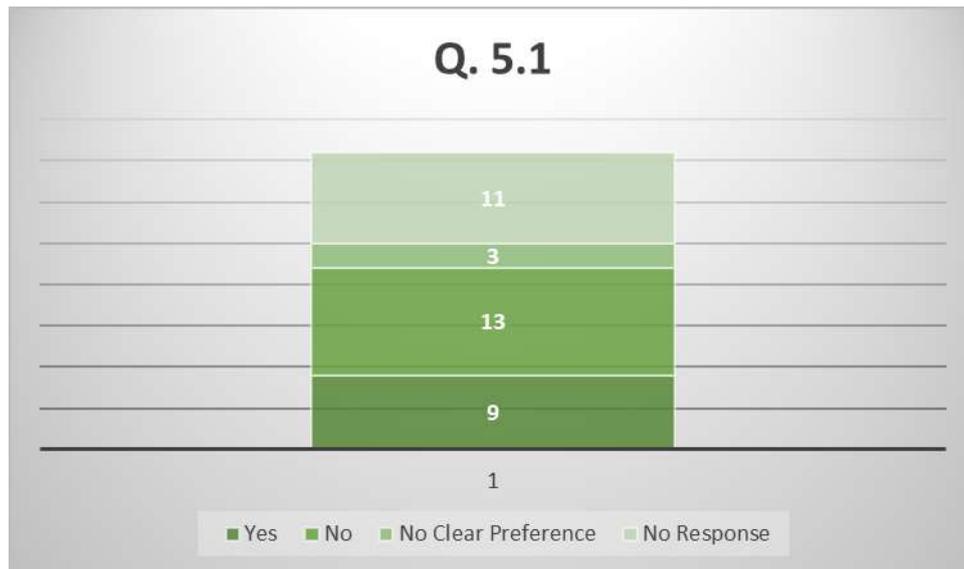
We do not plan to mandate the removal of paper cattle passports or paper AML1 sheep movement documents at present, but we will re-consider this policy proposal with stakeholders when legislation allows.

## Section 5 -Voluntary electronic reporting for all livestock

Electronic reporting is when all movements are reported via electronic methods (phone line, online or mobile communications)

5.1 Would you consider using EIDCymru as an electronic register instead of your paper flock book/herd book?

25% respondents said Yes, 36% said No and 8% had no clear preference.



The response data shows less respondents would use an online holdings register than those who would not. However when considering the reasons given for those who would not, some respondents said that they already keep electronic records and would prefer to keep using these.

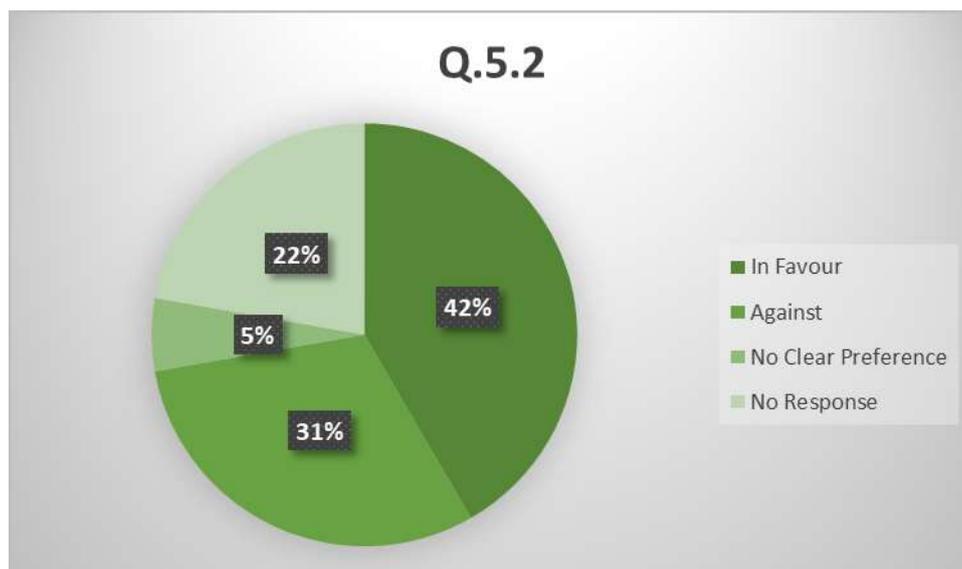
A selection of the responses are as follows:

- Need confidence in the system before they used the online registers.
- Prefer to use the current flock and herd books.
- Members would do this over a period of time with training and a reliable internet service. The register needs to be fully editable'. They requested 'confirmation of who would have access to these records and that it complies with GDPR rules'.
- Strongly believe that the use of electronic or paper herd/flock books should be optional. Many livestock keepers have already transitioned to take advantage of existing flock and herd management software packages and therefore it is essential that existing packages and EIDCymru are able to interact with each other.
- Many instances where any digital records are processed by an agent or organisation on their behalf. It would increase agent workloads and ability to manage many holdings and could also lead to increased costs for individual businesses. A duplication of the features of existing farm software packages, therefore adequate provisions should be made available for software

providers to facilitate the exchange of data to avoid duplication of manual data input. There is no information given about how the additional data provided for the flock/herd register will be used and concerned that inputting this information would also impose additional monitoring of reporting deadlines and are concerned how this data could also be used in a situation of inspection by government authorities.

## 5.2 Do you agree with the introduction of paperless reporting for all livestock?

15 respondents were in favour, 11 were against and 2 had no clear preference.



The majority of respondents were in favour of paperless reporting for all livestock, provided it was introduced on a voluntary basis. Whilst many respondents were in favour the message was clear that reporting alternatives should remain in place for those that are not able to use online reporting methods.

A selection of the responses are as follows:

- Connectivity in Rural Wales as a barrier to introducing paperless reporting
- Concerns were raised that the removal of paper reporting would be discriminatory against some keepers.
- It would simplify movement reporting and facilitate entries to market and abattoirs. Less use of paper and less storage of completed movement documents was given as a positive of paperless reporting.
- Voluntary electronic reporting should be introduced for a set period of time, giving farmers enough time to adapt to a new mandatory system in future'. They insisted 'Paper alternatives should remain in place for any departure CPH without electronic capabilities, or in the event of electronic failure'.
- Support introducing the ability to have paperless recording for all livestock, due the benefits this can bring for animal health and welfare. Need to provide an alternative for livestock keepers who do not have internet access.

- Paperless reporting offer advantages in terms of speed of assimilation into centralised movement records. However, it is likely that paper channel will still be required in the short term to accommodate those keepers that are not digitally enabled. Removal of the NEED for paper documents to accompany livestock would encourage greater use of electronic methods and reduce the number of paper-recorded movements.
- It is essential that any services developed for this purpose are user-friendly and compatible with low-bandwidth connections to ensure ease of use and maximum uptake and inclusion of all users. Facilitating integration with software from various providers, and a range of hardware used on-farm such as EID readers from a range of manufacturers is essential to allow ease-of-use and simplicity of any service.

### 5.3 Are there any reasons why you would want to continue to register births, deaths or report movements using paper forms?

31% respondents said Yes, 8% said No and 8% had no clear preference.



Of the consultation responses received to this question, the majority were in support of continuing to registers births, deaths or report movements using paper forms. Some of the reasons individuals gave in support of paper reporting documents, were poor internet, lack of training, paper allowed for unplanned events to be recorded and paper recording is quicker and easier.

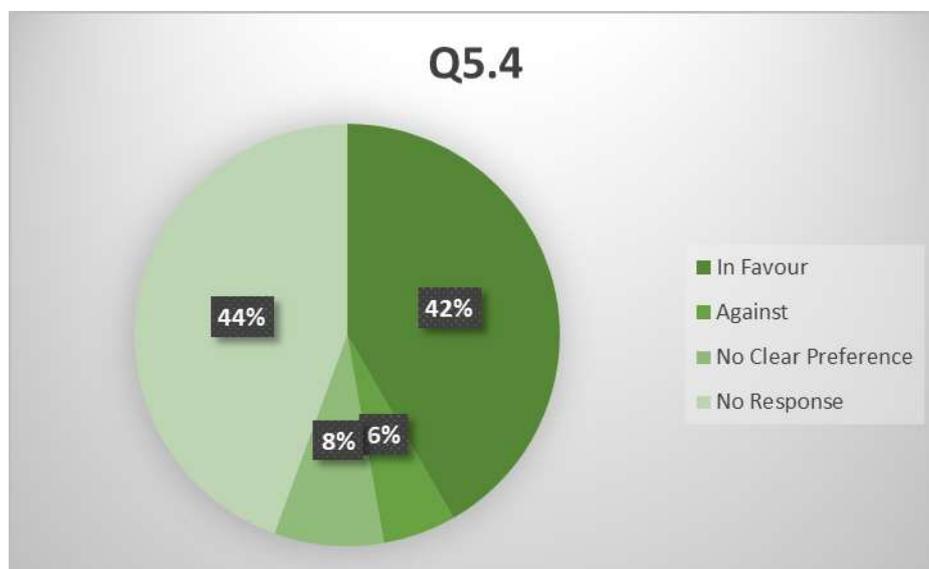
A selection of the responses are as follows:

- I have copies that I can always refer to'.
- It is important to have options for everybody. During very busy times on the farm it is much quicker to grab a paper licence and fill it in than it is to wait for a computer to turn on, load the website, wait for a security code to be sent to your phone, find your phone, enter all the details. This is also only possible if you have mobile reception and your internet speed is sufficient at that time.

- It is imperative that no livestock keeper is purposely excluded from keeping livestock or being able to comply with regulation as a result of the transition to an electronic system.
- No discrimination against those keepers who prefer this method for sound reasons due to lack of IT equipment and/or lack of broadband connection.
- The majority of keepers who still submit their livestock information via the original paper forms are those without the equipment, skills or connectivity to do so.

#### 5.4 Do you agree with our proposal to reduce herd register timescales for reporting the birth of beef calves to 27 days?

15 respondents were in favour, 2 were against and 3 had no clear preference.



There was strong support received in favour of this policy proposal.

A selection of the responses are as follows:

- 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.
- Does not oppose the proposal to reduce the timescale to report the birth of beef calves from 30 days to 27 days'.
- It would be simpler all round to change this to 30 days including the reporting requirements to avoid unnecessary and inadvertent breaches and without any compromise to food safety etc.
- By decreasing the days to 27, this will align with the same days specified within the legislation. This will ensure no confusion and assist with admin times when entered on or before the 27th day.

## **WG Response**

Many of the consultation responses supported the proposal for voluntary electronic reporting, provided it's voluntary and there are alternative reporting routes available to those keepers who are unable to use online methods.

Voluntary electronic reporting will be possible with the launch of EIDCymru, and paperless reporting will be encouraged when legislation allows. Many respondents agreed training and guidance was required, in addition to the systems support throughout the transition to EIDCymru.

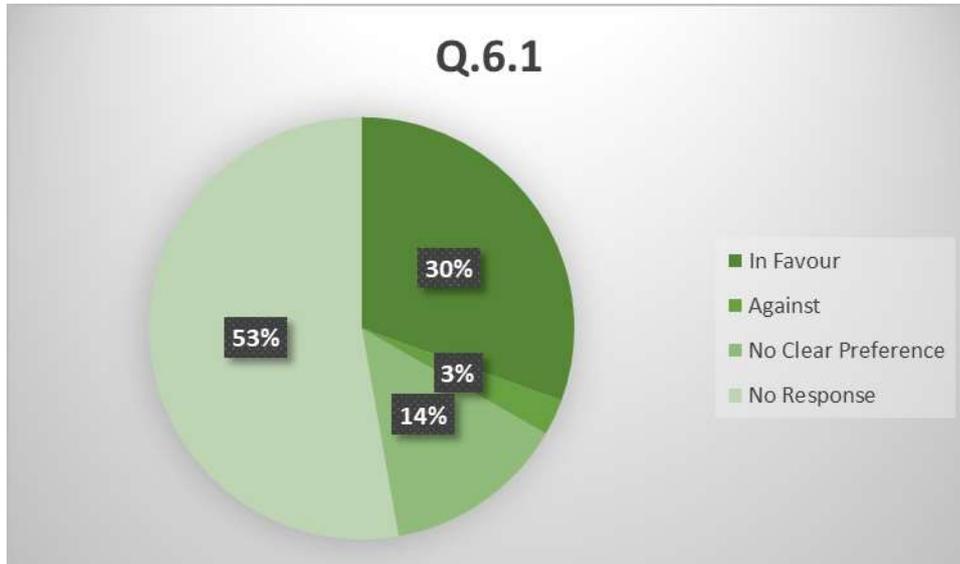
Provisions for the online holding register have been included in the development of EIDCymru. This will automatically record all birth, death and movements reported to EIDCymru and will be available for use by all keepers, on a voluntary basis.

Most respondents agreed with the proposal to align the reporting to the system and recording of birth registrations in the holding register, although many respondents suggested increasing the reporting of birth registrations to 30 days in line with the current holding register requirement. We will explore the regulatory requirements for bovine birth registrations and consider could the alternative alignment put forward of 30 days, be implemented.

## Section 6 – Voluntary show and event movement changes for all livestock

### Development of a circular movement reporting process for all species moving to and from showgrounds

11 respondents were in favour, 1 were against and 5 had no clear preference.



There was strong support for the policy proposal to develop a circular movement process for all livestock moving to and from shows and events.

A selection of the responses are as follows:

- This was a good idea and seems sensible, although they highlighted the need to be able to cancel or amend the return movement if animal sold at show and moves to another holding.
- Best kept as it is.
- If we can rely on show officials to process the movements. Most are volunteers and this would be something else they would have to do following the event. Not all shows have internet access.
- Support efforts to simplify the reporting process, and encourage the use of more digital services for improved traceability and disease control.
- Members 'were split by the proposal to allow circular movements to shows and events. Some questioned the need to amend the current system as it is universally understood by both keepers and event officials. Others expressed the view that in light of the information required in Sections One and Two of this consultation, a circular movement system would reduce the administration work for event officials. It is also crucial for the ability for livestock to be sold from an event or show and therefore be moved to a third CPH.

- This simplification is sensible and is welcomed and will not compromise disease risk. The reason for restricting this to 3 days is not clear and could the period be extended to 5 days?

### **WG Response**

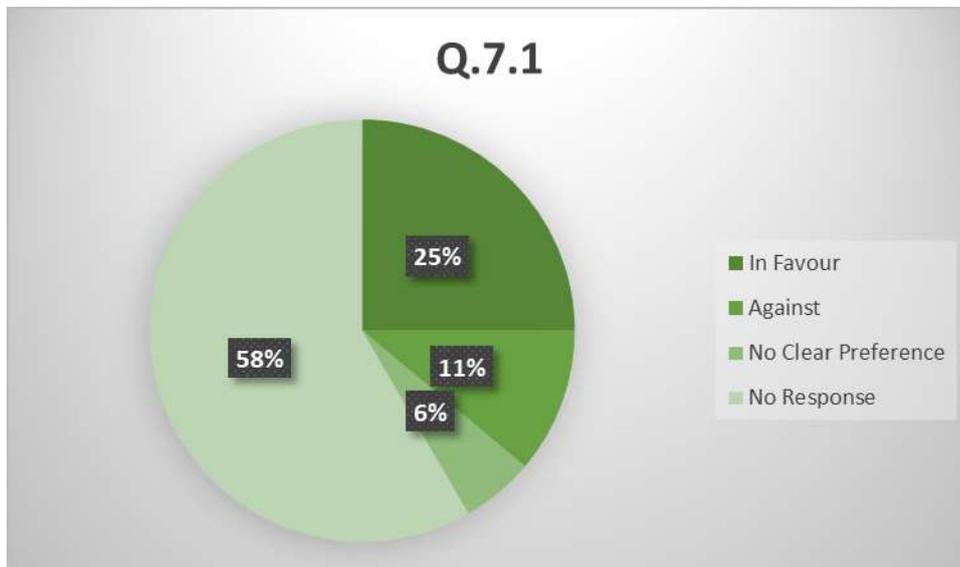
There was strong support to develop a circular movement process for show and event movements provided the movement reports can be amended if animals don't return to the original departure holding.

We will work with the stakeholders from the Livestock Show Associations in Wales, to develop a process that will work for all shows and events. We propose for circular show movement reporting to be implemented on a voluntary basis when legislation allows.

## Section 7 - Changes proposed for pig identification and traceability

7.1 What are your views on our aspiration to make annual registration and an annual inventory for pigs mandatory?

9 respondents were in favour, 4 were against and 2 had no clear preference.



Of the respondents that answered this question, the majority were in support of the proposal to make annual registration of pig holdings and annual inventory of pigs a mandatory requirement.

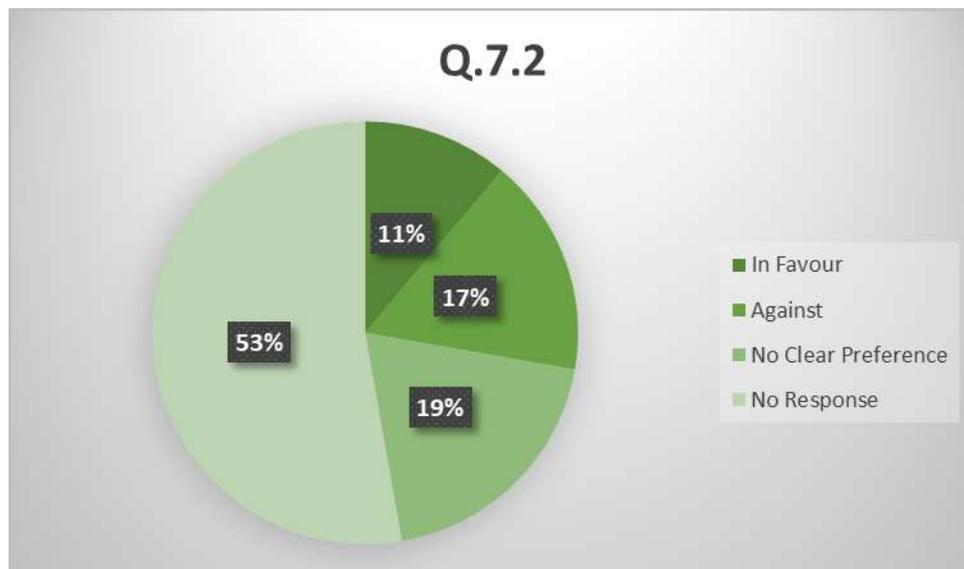
A selection of the responses are as follows:

- It would not be an issue, but highlighted that changes are common and pig numbers vary.
- Achievable and sensible for disease control if applied to all pigs, i.e. smallholder, breeders, growers.
- 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. Improved traceability is needed to effectively manage disease threats, such as African Swine Fever.
- Agree with the view of risk by the Pig Health and Welfare Council, in that knowing all locations where pigs are kept (and under who's day to day control), is critical to being prepared for a potential outbreak of disease. An annual reporting cycle would help cleanse and maintain up to date information held centrally.
- Annual registration would be a positive step forward and in line with the rest of GB and would not oppose an annual inventory. Pigs are reared in batches and looking at one date in a calendar year could be misleading depending on what the information is used for.

- Do not believe that annual registration and inventory of pigs would be a proportionate requirement due to the increase amount of paperwork and red tape which it would impose to keepers. Keepers of pigs manage their animals in batches in the interests of animal health and therefore are fully traceable within the supply chain.

7.2 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)?

4 respondents were in favour, 6 were against and 7 had no clear preference.



Responses demonstrated that there was not sufficient support for the introduction of electronic tagging for pigs.

A selection of the responses are as follows:

- Tagging all pigs as soon as possible is a very good idea and should be mandatory for all breeding stock.
- The lack of this seems to leave the system with potential for exploitation.
- Given the less common use of ear tags, is there a welfare issue / risk with this type of identification?
- If electronic tags and individual movement reporting is required for all pigs, then this will result in significant cost and recording effort by pig farmers. I think EID should be required but perhaps not recording all individual movements. A slaughter tag/batch movement, as with sheep, should be considered for pigs under one year of age.
- Long ear pigs have issues with tags snagging and ripping the ear, welfare and a show issue, tattoo works better. Not got an issue with slaughter tags but the head often does not accompany the carcass. Young stock buyers prefer to put their own slaughter tags on the pigs, no confusion on holding they have come from.

- EID for breeding stock at a smallholder level makes sense (i.e. where animals are moved between farms and back just for breeding). Where sows are spending their lifetime on farm, EID isn't necessary, as individual breeding animals have an identifying number tag. EID for growing pigs will only work if the corresponding infrastructure is in place. Applying ear tags is a mutilation, which customers are starting to want to move away from. It also can impact the market value of 5th quarter; and so moving to a system that is fully based on ear tags may not have longevity, it will also not provide a robust link to the carcass during processing.
- Breeding stock 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, so having a method of tracing these culled animals through market and collection points is important to identify the holding of origin. 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. 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.

### 7.3 What are the benefits or potential obstacles to pig identification including the herd mark and unique ID number?

3 respondents thought benefits outweigh obstacles, 6 thought obstacles outweigh benefits and 5 had no clear preference.



From the responses received, there was limited support for including the herd mark and unique identification number for pig identification.

A selection of the responses are as follows:

- A herd of birth identifier and movement history for individual pigs would benefit traceability in the event of a disease outbreak and for food chain audit. It can only be used with ear tags. Most pigs moving to slaughter use a slap mark on each shoulder, this includes just the herd number. A slap mark would not work if it had to include an individual number as well. Moving to tagging instead of a shoulder slap could cause traceability issues post slaughter for meat processors. A lot of pigs in Wales are pedigree and have individual pedigree identification. Your proposal for electronic tagging of pigs will result in pedigree pigs having two unique identifier numbers. Some pedigree breeds use ear tattoos and some an ear notching system.
- Unique identification will help to improve traceability, animal health and human health standards. 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.
- The practical obstacles to prevailing methods (tattoos and slap marks) are physically getting a long number sequence onto the animal and ensuring that number is only used once. Issues of long-term legibility could be expected to increase, as there will be a greater number of digits to decipher visually. There may also be greater objections on welfare grounds to these very physical forms of identification. Any mandatory use of individual identification will lead to a high turnover of official numbers available for use, given the prolificacy and shorter generation interval in pigs.
- The increased risk to farm workers who would be required to undertake this task is disproportionate to the benefits of identification. They noted 'pigs are managed in groups in the interests of animal health and welfare, therefore an added procedure which would increase stress to the animal could lead to detrimental effects. Treatments are also provided on a group basis where required therefore individual identification would be disproportionate.
- Would be seen as beneficial for accurate performance records. Furthermore, lifetime traceability improves product integrity and market access, along with assisting with the management of disease and chemical residue issues.

## **WG Response**

Whilst respondents were supportive of the policy aims of the proposal for annual registration of pig holdings and an annual inventory for pigs, responses highlighted the need to further develop our thinking in this area. To enable us to achieve the policy ambition of improving pig traceability in Wales, we will work with key stakeholders in the Welsh pig industry to explore alternative methods to annual recording of pig numbers. We will not take this proposal forward in its current form but will investigate improved traceability recording options as we develop EIDCymru for pig movement reporting.

Overall responses do not indicate that there is a need to introduce electronic tagging for pigs at present. As a next step we will work with both Welsh and the wider pig industry stakeholders to determine the specifics of the proposals in more detail and consider how they could be progressed in future.

There was not sufficient support received to progress with the proposal to include the herd mark and unique ID number for all pig identification.

All three consultation proposals on pig traceability need further research and development alongside consideration of alternative approaches to ensure they will work effectively and achieve the policy aim. We will work with the wider pig industry stakeholders to refine the proposals as part of our longer term programme of transition to EIDCymru and pig identification and movement policy reform.

## 8.0 Consultation outcomes and next steps

A full and comprehensive analysis of all responses received was undertaken. The proposals that received support will be taken forward in upcoming legislative amendments and enabled through the transition to EIDCymru for cattle and pigs.

The table below shows how these proposals will be taken forward by enabling them on a voluntary basis when the legislation allows. Some proposals will have a mandatory provision starting from a later date. We will communicate timescales with stakeholders when legislative timescales have been agreed.

Consultation Proposals		Voluntary	Mandatory (from a later date)
Whole Movement Reporting			
Journey & Transport Information			
24 hour Reporting for Markets, Abattoirs, Assembly & Collection Centres			
Pre-movement Reporting			
Electronic Reporting	Online Holding Register		
Electronic Reporting	Removal of Paper Registrations & Movement Reporting for Cattle (PPAFs & CPP13)		
Electronic Reporting	Birth Registration Alignment		
Circular Show Moves			

## Annex A – List of Respondents

North Wales Police
North Wales Rural Crime Team
J Turrell
A Hughes
H Jones
Welsh Livestock Auctioneers Association
Karro Food Group
A Charmley
G W Jones
K Stebbings
NFU Cymru
J Yeomans
Wales Young Farmers Clubs
B Barney
I Davies
NSA Cymru
British Veterinary Association
Farmers' Union of Wales
Agricultural and Horticultural Development Board
Kepak

There were also 16 respondents who wished to remain anonymous.