

# Farmers' Union of Wales Response to Changes to Livestock Identification, Registration and Movement Reporting Consultation

21 December 2021

## CONTENTS

About the Farmers' Union of Wales	2
Summary	2
1.2 Are there any situations where it is not possible to record the destination CPH? If so, can any steps be taken so this information can be provided?	3
1.3 Do you have any additional views on this?	3
2.1 Do you support the collection of the haulier and transport details for all livestock movements? Please provide reasons for your view.	3
2.2 Are there any situations when you would not be able to provide all the journey details? Please provide examples.	4
2.3 Do you have any additional views on this?	4
3.1 Do you agree with our aspiration to make CPRC same day reporting mandatory? Please provide your reasons for this?	5
3.2 Do you have any additional views on this?	5
4.1 Are there any situations where the current paper passport is still required?	5
4.2 Are there any situations where the current paper AML1 is still required?	5
4.3 Would you welcome the use of more digital services? What do you require in order to do this? E.g. training	5
4.4 How do you currently report movements and why?	6
4.5 Do you have any additional views on this?	6
5.1 Would you consider using EIDCymru as an electronic register instead of your paper flock book/herd book? What are your reasons for this?	7
5.2 Do you agree with the introduction of paperless reporting for all livestock? What are the reasons for your views?	7
5.3 Are there any reasons why you would want to continue to register births, deaths or report movements using paper forms?	8
5.4 Do you agree with our proposal to reduce herd register timescales for reporting the birth of beef calves to 27 days? What are your reasons for this?	8
5.5 Do you have any additional views on this?	8

6.1 What are your views on our proposal to allow show exhibitors to create circular moves?	8
6.2 Do you have any additional views on this?	8
7.1 What are your views on our aspiration to make annual registration and an annual inventory for pigs mandatory?	9
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)?	9
7.3 What are the benefits or potential obstacles to pig identification including the herd mark and unique ID number?	9
7.4 Do you have any additional views on this?	9
8. EIDCymru will be a fully bilingual service. We would like to know your views on the effects you think the extension of EIDCymru and introduction of Bovine EID could have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How can positive effects be increased, or negative effects be mitigated?	9
9. Please also explain how you believe the proposed policy options could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.	10
10. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.	10

## **About the Farmers' Union of Wales**

The Farmers' Union of Wales (FUW) was established in 1955 to exclusively represent the interests of farmers in Wales, and since 1978 has been formally recognised by the UK Government, and subsequently by the Welsh Government, as independently representing those interests.

The FUW's Vision is thriving, sustainable, family farms in Wales, while the Mission of the Union is To advance and protect Wales' family farms, both nationally and individually, in order to fulfil the Union's vision.

In addition to its Head Office, which has thirty full-time members of staff, the FUW Group has around 80 members of staff based in twelve regional offices around Wales providing a broad range of services for members.

The FUW is a democratic organisation, with policies being formulated following consultation with its twelve County Executive Committees and eleven Standing Committees.

## **Summary**

The vast majority of farmers and individuals within the agricultural industry who voted to leave the European Union did so with the belief that it would allow the UK and Welsh Governments to introduce new legislation which would lead to a reduction in red tape. However, the FUW strongly believes that the proposals set out in this consultation will in fact result in added bureaucracy and red tape for livestock keepers.

In addition, FUW members felt strongly that the proposals would result in a negligible improvement for the traceability of livestock in comparison to the extensive movement reporting system that is already in place in Wales and the UK.

Scepticism was expressed with regards to the introduction of a Wales only system and its ability to interact effectively with other systems in operation across the other devolved UK nations. In particular, those livestock keepers with cross border holdings would be required to comply with Welsh and English rules as well as two different recording systems.

The costs associated with introducing such a system were also questioned given that the development of a UK wide system would be more cost effective and efficient for cross border holdings and livestock movements.

Nevertheless, praise was given to the current BCMS/CTS system with regards to its user friendly interface, automated telephone services and bilingual helpline service.

Notwithstanding the above, FUW members provided the following comments in response to the proposals:

### **1.1 What are your views on the introduction of whole movement reporting for cattle?**

FUW members who are solely cattle keepers expressed their concerns with providing the information required for a whole movement report due to the added administrative burden entailed and complications in obtaining the information required. However, keepers of both 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.

### **1.2 Are there any situations where it is not possible to record the destination CPH? If so, can any steps be taken so this information can be provided?**

Members questioned the ease of availability of the destination CPH and the additional administrative work required to obtain such information. It was felt that the onus of reporting this information was held solely on the keeper and not shared with the persons receiving the livestock.

Particular concern was raised with the scenario of 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.

In such a scenario, the seller would not necessarily know the end destination of the livestock without that information being provided by the dealer. Many questioned if the dealer would be forthcoming with disclosing such details due to business incentive and/or GDPR issues.

### **1.3 Do you have any additional views on this?**

It was questioned whether the proposed multi-species EID Cymru database would be compatible with existing herd and flock management software packages. The ability for EID Cymru and existing farm management systems to interact with each other is perceived as absolutely essential if EID Cymru is to become a well integrated and useful tool in supporting farmers and providing the Welsh Government with movement reports and flock/herd notifications.

Also at present, many members find the EID Cymru interface to be difficult to navigate and overly complicated. FUW members who are familiar with the BCMS/CTS system agreed that it is practical and user friendly.

### **2.1 Do you support the collection of the haulier and transport details for all livestock movements? Please provide reasons for your view.**

Please see the answer provided in Section 1.1.

Cattle keepers in particular believe that the request for further information to be included will create an additional level of unnecessary bureaucracy.

## **2.2 Are there any situations when you would not be able to provide all the journey details? Please provide examples.**

FUW members questioned the need to pre-record the time of departure and journey times given that such details are volatile and out of the control of the farmer in many instances i.e. traffic, delays when loading, delays at market.

Furthermore, in a scenario where livestock is transported by a haulier, it would be impractical for the farmer to pre-record such information and then be responsible for correcting any discrepancies following the completed movement.

Those who use hauliers to transport livestock highlighted the inconvenience of knowing the exact vehicle registration of the transport vehicle beforehand. Many livestock hauliers have a fleet of vehicles, often with very similar private number plates. Even with a fully editable database, noting and editing this information will add to the administrative workload for farmers.

It was also questioned why the provision of vehicle registration information helps with the traceability of any disease outbreak. Providing such data would imply that all movements undertaken by a particular vehicle uses the same trailer. Given that the same articulated lorry or pick-up could tow a number of different trailers in a day, this assumption could be considered as a risk of cross contamination.

Such examples raise the question of the validity of a pre-movement reporting system where there are numerous unpredictable variables involved. It is worth noting that The Big Farming Survey conducted by RABI<sup>1</sup> found that 45 percent of the farming community cite 'regulation, compliance and inspection' as a cause of stress.

The request for further ambiguous information when moving livestock is considered as another requirement where unintentional errors may occur that could affect the farmers' ability to adhere to regulation and compliance.

## **2.3 Do you have any additional views on this?**

Great strides have been made in livestock traceability systems over recent decades which, notwithstanding outbreaks such as Foot and Mouth in 2001, the FUW would argue have effectively prevented and managed severe disease outbreaks in the UK.

The FUW suggests that pre-recording loading and journey times should be estimated given the impracticalities of predicting and further correcting movement records.

---

<sup>1</sup> RABI Big Farm Survey: <https://rabi.org.uk/rabi-launches-big-farming-survey-results/>

It should also be noted that the UK already has some of the most stringent livestock recording requirements in the World and the UK Government is currently negotiating on a trade agreement with Australia where inter-state (states larger than the land area of Wales) movement records must only be kept for reference.

### **3.1 Do you agree with our aspiration to make CPRC same day reporting mandatory? Please provide your reasons for this?**

The FUW fully opposes the proposal to make same day reporting mandatory. Given the nature of weekly livestock sales, administration staff are required to process large numbers of movement records in a short space of time. There are many instances where it will be impossible for movement records to be reported on the same day, particularly with evening sales, leading to unfair penalties and sanctions.

### **3.2 Do you have any additional views on this?**

The impact of introducing mandatory same day reporting and further bureaucracy on livestock markets should not be undermined. In many rural areas, livestock markets act as the backbone for local agriculture, rural economies and communities. They also provide further economic benefits to rural communities through the sale of agricultural sundries and commodities, and an opportunity for farmers to socialise and support their mental health.

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

The FUW fully supports 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.

There is also the question of the safety and reliability of containing all information online and access to reliable digital connectivity across the whole of Wales for all livestock keepers.

The FUW maintains that a paper option for livestock recording, registration and movements must be retained.

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

FUW members strongly agreed that retaining the option of using the paper AML1 form is essential given that there are often technical issues which can emerge with modern technology.

Please also note the response provided to Section 4.1.

#### **4.3 Would you welcome the use of more digital services? What do you require in order to do this? E.g. training**

Despite the reliability of the English BCMS helpline, FUW members praised the simplicity of the BCMS/CTS system and the support available, particularly with regards to the Welsh language helpline.

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.

Initial training and continued support will be required if the multi-species EID Cymru platform is to be a success. Bilingual step by step guides alongside Welsh and English language helplines are seen as essential. A supportive attitude toward users and an appreciation that errors and anomalies occur which can be corrected with ease (without fear of penalties) would encourage keepers to embrace EID Cymru.

An agency platform was also suggested, similar to that provided by BCMS/CTS and RPW online, in order to assist those who lack computer literacy and in areas with inadequate digital connectivity. Nevertheless, an agency service would be limited to 'office hours' and therefore would be unable to provide assistance with pre-movement reporting outside of these hours.

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

The majority of cattle keepers complete their movements either by telephone or online themselves or via a third party agent such as their local FUW county 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, many stating that the EID Cymru system is too complicated (even for the computer literate) and time consuming.

A small minority of members welcomed the proposal of allowing the electronic movement reporting of sheep via EID Cymru 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.

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

The FUW believes that the reporting of livestock movements, births and deaths must be inclusive to all.

An overriding issue which was raised in every discussion with members was the lack of satisfactory digital connectivity in rural areas.

The NFWI-Wales survey highlighting the digital urban-rural divide carried out in partnership with the FUW, CLA, NFU Cymru and Wales YFC reported that 'over 50% of respondents from rural areas felt that their internet access was not fast nor reliable,' with '66% in rural areas stating that they had been impacted by poor broadband.'<sup>2</sup> Furthermore, the Ofcom: Connected Nations 2020 Wales report estimated '18,000 premises in Wales are still without broadband, with 9,000 premises unable to access decent broadband or good 4G coverage.'<sup>3</sup>

Given these statistics, the concerns raised by members are clearly pertinent. Many stated their frustration with RPW Online services and correspondence being almost exclusively online, with important documents such as contracts, payments and notifications being difficult to access due to poor or non-existing connection in rural parts of Wales.

If livestock registrations and movement notifications were to follow the same route as RPW Online, livestock keepers would take the view that they have been inadvertently set up to fail by breaking regulations and compliance rules at no fault of their own.

In this context, it should also be noted that many areas across Wales have experienced power cuts over recent weeks and months due to extreme weather conditions and therefore under such a scenario, retaining the paper options would allow keepers to adhere to such rules and regulations.

There is also the added concern that in the event of being inspected by authorities whilst transporting livestock, keepers will be unable to confirm the movement and livestock ownership details without a paper passport or AML1 form to hand.

#### **5.1 Would you consider using EIDCymru as an electronic register instead of your paper flock book/herd book? What are your reasons for this?**

The FUW is neutral in terms of using EID Cymru as an electronic register, but strongly believes that the use of electronic or paper herd/flock books should be optional given the issues outlined above.

---

<sup>2</sup> Digital Urban/Rural Divide:

<https://www.thewi.org.uk/wi-in-wales/news-and-events/survey-highlights-digital-urban-rural-divide>

<sup>3</sup> OFCOM Connected Nations 2020 Wales report:

[https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0020/209441/connected-nations-2020-wales.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0020/209441/connected-nations-2020-wales.pdf)

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 EID Cymru are able to interact with each other.

**5.2 Do you agree with the introduction of paperless reporting for all livestock? What are the reasons for your views?**

The FUW wholeheartedly rejects the ambitions to introduce a paperless reporting system for all livestock.

The reasons for retaining a paper option for livestock reporting are outlined above.

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

In addition to the reasons outlined above, it is also 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.

**5.4 Do you agree with our proposal to reduce herd register timescales for reporting the birth of beef calves to 27 days? What are your reasons for this?**

The FUW does not oppose the proposal to reduce the timescale to report the birth of beef calves from 30 days to 27 days. However, the FUW is requesting for evidence which suggests why this change is required.

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

No further views were expressed.

**6.1 What are your views on our proposal to allow show exhibitors to create circular moves?**

The views of FUW 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.

## **6.2 Do you have any additional views on this?**

It must be taken into consideration that human errors exist. The FUW is requesting details on how errors will be rectified on an online database and whether a grace period would be provided for making such changes.

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

The FUW believes that the introduction of an annual pig registration and inventory would simply create additional paperwork. Many livestock keepers have pigs to fatten over a short period of time and therefore such holdings would not necessarily be considered as pork producers.

## **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)?**

While a small minority of FUW members are pork producers, there was a strong objection to the proposal to introduce mandatory electronic tagging of pigs given their aggressive nature and the increasing risk of injury to livestock in the event of such tags being ripped out.

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

FUW members did not see the need to change from the current system. Pigs are notoriously difficult animals to work with and the introduction of further individual identification requirements would increase the cost and administrative burden for pork producers.

## **7.4 Do you have any additional views on this?**

No further observations were made in response to this question.

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

The FUW strongly believes that by providing a fully bilingual service for all aspects of EID Cymru and Bovine EID, both the Welsh and English languages are being supported and treated equally.

The availability and future provision of fluent Welsh speaking helpline operatives is essential in supporting livestock keepers in Wales.

It should be noted that the Welsh Government's own figures show that 43% of workers within the agriculture, forestry and fishing sectors speak Welsh in comparison with education at 27%, the sector with the second largest percentage share, and 17% for all Welsh workers.

This means that the prevalence of Welsh speakers in the agricultural industry is 153% higher than for Wales as a whole and emphasises the importance of providing bilingual services to individuals and workers within the agricultural industry.

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

It is imperative that policy proposals can be discussed freely through both languages and that responses can be received in both Welsh and English. In some of the more prominent Welsh speaking areas of Wales, it is also felt that Welsh language options, for example on telephone services, should be listed first followed by English options.

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

The added costs associated with the possible introduction and use of EID Bovine tags is a concern. Coincidentally, on the 5th November 2022, the Minister for Agriculture, Food and the Marine for Ireland announced a €4.25 million financial package to assist bovine keepers with the additional cost of introducing EID tags. The FUW would like clarity on whether a similar subvention scheme will be made available in Wales.

Observations were also made to the change from the 'UK' tag prefix to 'GB' following the UK's departure from the European Union. The FUW would support the introduction of a 'CYM' prefix given that separate livestock recording systems are being proposed in each of the devolved UK nations, as this would enable Wales to further promote brands such as PGI Welsh lamb and beef in export markets.