



**Consultation on the implementation of
Electronic Identification for Sheep
and
individual recording for Sheep and Goats**

Response of RBST

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The Rare Breeds Survival Trust (RBST) is the Non-Governmental Organisation dedicated to the conservation of native Farm Animal Genetic Resources, with particular responsibility for native breeds at risk. It also is the breed society for eight breeds of sheep registered in the Combined Flock Book (Boreray, Castlemilk Moorit, Manx Loaghtan, Norfolk Horn, North Ronaldsay, Portland, Soay, Whitefaced Woodland). It has supported native breeds at risk since its foundation in 1973, and has highlighted the negative impact of increasing bureaucracy and regulation on the sheep industry in the UK. The Trust has around 10,000 members throughout the United Kingdom and a very flourishing support group network.

RBST Opposed to Electronic Identification (EID)

RBST is opposed to the introduction of EID in sheep because its investigations show that the additional costs and regulation will severely reduce the number of keepers of native breeds at risk and hence further endanger those breeds. These breeders already keep detailed and accurate records of their pedigree sheep. A survey carried out by RBST in 2008 indicated that 32% of owners of sheep breeds at risk intended to cease keeping such stock within three years specifically as a result of the introduction of EID. This outcome is reinforced by the statement in the Executive Summary (5.1.7.) of the Impact Assessment (Defra) version 1 (12 March 2009) that the “estimated tipping points at which manual recording is not viable or economical and a keeper would chose to record manually is 200 breeding ewes for option 1 - -.” These producers would still incur the extra costs of electronic tagging. Therefore, introduction of EID is contrary to the UK’s commitment to the conservation of farm animal genetic resources under the Convention on Biological Diversity, and to the objectives of Council Regulation (EC) 870/2004 (“- - to conserving genetic resources and increasing the use of under-utilised breeds and varieties in agricultural production”).

RBST notes that the partial impact assessments carried out by Defra in relation to the introduction of EID did not consider the impacts on breeds at risk and **requests that an assessment of the impact EID will have on the UK’s farm animal genetic resources be conducted prior to implementation.**

RBST notes that the proposals for implementation apply only to England. It is essential that there is **consistent application** throughout the UK otherwise the ability to trade within the UK will be compromised.

RBST notes clause 11 of EC Regulation 21/2004 which states: “In Member States with a relatively small ovine or caprine animal population, the introduction of an electronic identification system may well not be justified; it is therefore advisable to allow such Member States to make the system optional.” This derogation indicates that electronic identification is not essential to achieve the objectives in the EU, and RBST requests that **the derogation is extended to native breeds at risk in the UK.**

In the context of the specific questions posed in the consultation, and without prejudice to the items above, RBST responds as follows:

Question 1.

Do you agree that Defra should implement the slaughter derogation to its fullest extent, which is the least burdensome and lowest cost option overall. If you do not agree please explain why and identify your preferred option.

Response:

RBST does not consider any of the options are acceptable, but would agree that Option 1 presents the least problems to breeders and primary producers. However, it must be noted that Option 1 will cause greater problems for finishing units and auction marts, and this will have a knock-on detrimental effect throughout the industry. “Store lamb finishers may choose to purchase only lambs that have been electronically identified” and thus producers may have no option in practice.

Question 2.

Do you agree that the slaughter tag should not include an individual number because of the increased recording burden this would impose on keepers throughout the chain?

Response:

RBST agrees, provided that this does not prohibit the inclusion of an individual number for the owner's purposes, and in the awareness that store lamb finishers may choose to purchase only lambs that have been electronically identified (see above).

Question 3.

Do you agree that we maintain the use of the slaughter derogation for goats unaltered?

Response:

RBST agrees.

Question 4.

Do you agree the proposed simplified replacement rules? If not please explain why and what your proposals are.

Response:

RBST agrees, but notes that owners of pedigree sheep are likely to prefer the identical numbered replacement tags which will further increase costs.

Question 5.

Do you agree that we should not require cross referencing where different numbered replacements are applied on the holding of birth in respect of animals born before 31 December 2009 only? Or would you prefer to see replacements cross referenced as for animals born or identified after 31 December 2009 so that the rules are the same?

Response:

The proposed revisions are not significant, but greater consistency would be achieved if all replacements are cross-referenced. The over-riding problem for some breeds is that small ears limit the number of times replacement tags that can be inserted (see notes at the end of this response on equipment).

Question 6.

Do you agree that metal tags should not be removed because of potential welfare issues?

Response:

RBST agrees.

Question 7.

Do you agree that the use of injectable transponders should not be authorised until such time as public health issues have been addressed?

Response:

RBST agrees.

Question 8.

Do you agree that where a bolus is applied the match up non electronic ear tag should be black with distinguishable letters and numbers?

Response:

RBST considers that the significant loss (e.g. regurgitation) of boluses experienced in previous projects (e.g. National Scrapie Plan (NSP)) renders them an unreliable and hence ineffective method of identification for traceability. The use of boluses would require flock owners (whatever the flock size) to have constant access to a reader to ascertain whether a bolus was present. RBST recommends that boluses are not used for EID.

Question 9.

Do you agree that all electronic tags should be yellow in colour to ensure that electronic tags are distinguishable from non-electronic ones? If not please explain why and offer an alternative solution.

Response:

Ear tags are supplied in pairs by the manufacturers and alternate colours within a batch of tags are not possible. RBST disagrees with this requirement.

Question 10.

Do you agree that we should only authorise the use of electronic identifiers and reading equipment which conform to the minimum requirements and the Technical Guidelines?

Response:

RBST agrees, but with the proviso that all EID tags and readers should be compatible, otherwise the tags on purchased animals may not be readable by the purchasers (also see notes below).

Question 11.

Do you agree that contingency arrangements should be put in place to ensure that normal trading practices are not disrupted in the event of power or equipment failure? If so what do you think these arrangements might be?

Response:

RBST agrees with the arrangements as outlined in the consultation document.

Question 12.

Do you have any suggestions about how we could further reduce costs and burdens?

Response:

RBST is particularly concerned about the impact of EID on breeds at risk, which are often kept in small flocks for which the additional costs are disproportionate. However, most keepers of breeds at risk are adept at pedigree recording and well used to keeping individual records. RBST urges that a derogation for breeds at risk is made to the effect that the current double ear tagging, plus a requirement for individual recording, is available for keepers of breeds at risk. This would encourage both new keepers of breeds at risk and support existing keepers, and hence contribute to the conservation of the U.K.'s farm animal genetic resources.

Other comments:

Impact assessment:

RBST requests that an assessment of the impact EID will have on the UK's farm animal genetic resources be conducted prior to implementation.

Website:

Paragraph 4.32 is unclear in stating that the 'movement document will be made available on the Defra website'. Will this be the only means of obtaining a movement document? Not all sheep (and goat) keepers have computers and/or internet connections.

Export:

Paragraph 4.33: animals suitable for export, particularly as breeding animals, cannot always be identified within six months of birth (i.e. the period before tagging must be completed). In addition, orders from overseas breeders cannot be anticipated. There should be provision to allow replacement of a slaughter tag with EID solely for the purpose of export of animals for breeding.

Equipment:

- a. It is not acceptable to impose a system unless it is supported by **reliable equipment**, and currently the equipment necessary for EID currently is unreliable. A survey by the Welsh Assembly Government indicated that reliability (i.e. accuracy of reading) was as low as 38% in some cases.
- b. Some owners report that tags can be ripped out with **damage to ears**, whilst the small ears of some breeds of sheep limit the number of times replacement tags that can be inserted.

- c. It is essential that there should be **compatibility** between all EID tags and readers; otherwise the tags on purchased animals may not be readable by an owner's reader.

Longevity

RBST notes in Annex B (Summary of the Two Partial Impact Assessments) that the impact assessments assume, in relation to changes to replacement tag rules up to 2014, that almost all older animals will be dead. This does not recognise the longevity of many ewes in native breeds at risk.

Conclusion

As can be seen the Rare Breeds Survival Trust is greatly alarmed by the introduction of EID in sheep. We have real and well founded concerns about the native breeds of sheep particularly those included in the Defra Breeds at Risk Register (BARR). We sincerely hope that greater consideration is given to some of the comments concerned raised in our response.

Perhaps most worryingly in our view the EC Regulation 21/2004 on Electronic Identification frustrates the objective of the Genetic Resources EC Council Regulation (870/2004) and this latter Biodiversity Regulation is a far more important Regulation which should cause the legislators to introduce a derogation to the EID Regulation. Indeed Paragraph 5 discusses the need to increase the use of under utilised breeds! This legislation therefore clearly seeks to assist small breeders of sheep whilst EID introduction will have completely the opposite effect!

RBST would be happy to comment further on any aspects of this Consultation and looks forward to engaging further with Defra upon its impact on the native sheep industry.

Tim Brigstocke
Executive Chairman
For/and on behalf of the Rare Breeds Survival Trust