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Our ref: 21/2004 Consultation

11 August 2005

Dear Consultee

### **SEERAD proposal to introduce changes to the Scottish sheep and goat identification and traceability system.**

I am writing to seek your comments on proposed changes to the identification and traceability system for sheep and goats that currently operates in Scotland. These proposed changes are required as Scotland – like the rest of the UK – is required to implement EC Regulation 21/2004 which came into effect on 9 July 2005. This Regulation is being introduced to establish a traceability system in EU Member States for ovines and caprines (sheep and goats) to try and control any future outbreak of disease. It is important to note that 21/2004 is a cross-compliance element of the new Single Farm Payment Scheme.

In June 2004 we applied to the Commission for a derogation from the double tagging requirement within the Regulation. However, when Commission Auditors visited the UK in January 2005 to assess our traceability system they identified some elements which required improvement. Consequently on 5 July they only granted the UK a temporary derogation until 30 April 2006. They have arranged to re-inspect our revised system this December and we are hopeful they will grant the full derogation which will allow us to avoid the need to double identify animals except for those being exported and born after 9 July 2005.

Receiving this decision on 5 July has given SEERAD a very tight timescale in which to formally consult industry and to draft and implement domestic legislation by the middle of this October. Consequently we have had to reduce the normal Scottish Executive consultation period to 4 weeks. However we have been working with industry stakeholders from the outset and will continue to do so during the consultation period to resolve any outstanding issues

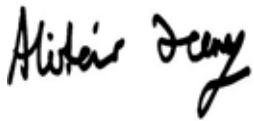
Introducing the minor changes required here will have minimal cost implications for some keepers and other industry sectors; in some cases there may even be a cost saving. The bulk of increased costs will be borne by SEERAD as new and modified databases will be required to ensure Scotland complies fully with the new Regulation. These costs are

explained in more detail in the Partial Regulatory Impact Assessment (RIA) – Annex B of the attached Consultation paper.

I would welcome your views on the proposed changes to the current system as detailed in the Consultation paper. Also enclosed is a list of some questions you may wish to consider responding to, although you are free to comment on any part of this paper and accompanying documents.

Please refer to Annex E of the consultation paper for guidance on how to respond – by 8 September - to these proposed changes to the current sheep and goat identification and traceability system

Yours sincerely

A handwritten signature in black ink that reads "Alistair Henry". The signature is written in a cursive, slightly slanted style.

Alistair Henry  
Livestock ID & Traceability Branch  
SEERAD

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**PROPOSAL TO MAKE CHANGES TO THE CURRENT  
SHEEP AND GOAT TRACEABILITY SYSTEM TO  
ENSURE SCOTLAND FULLY IMPLEMENTS  
EC REGULATION 21/2004**

**A consultation document by the Scottish Executive  
Environment and Rural Affairs Department**

**11 August 2005**

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# 1 Introduction

## *Purpose*

- 1.1 In December 2003, the EU Commission adopted EC Regulation **21/2004**; effective from 9 July 2005. This Regulation is to enable the establishment of an EU wide traceability system for ovines and caprines (sheep and goats) to support on-going disease prevention and any future disease control needs.
- 1.2 **It is important that Scottish sheep and goat keepers comply fully with Reg 21/2004 as it is a cross-compliance element of the new Single Farm Payment Scheme (SFPS).**
- 1.3 The aim of this consultation is to obtain your views on the minor changes required to our current sheep and goats identification and traceability system to allow us to retain this workable system instead of the double tagging required under 21/2004.
- 1.4 Other UK Administrations will also be undertaking consultation exercises.

## 2 Background

- 2.1 In late 2001, SEERAD became aware that the EU Commission was considering the introduction of an identification and traceability system for sheep and goats. Commission officials were keen to ensure that the possibility of outbreaks of disease – such as the UK 2001 FMD – was reduced as much as possible. In the event of a disease outbreak occurring, the control system they were considering would play a major part in reducing the spread of infection and ideally shorten the time taken to bring the outbreak under control.
- 2.2 Around the same time, SEERAD were in discussion with our Sheep (& goat) Industry Stakeholder Group (**SISG**) members to see how the industry could resume animal movements following FMD. Although keen to progress this, we all resolved to ensure that 'lessons learned' from FMD were incorporated into any new system to minimise the risk of future disease outbreak. The State Veterinary Service (SVS) were especially focussed on ensuring that the majority of movements onto and off Scottish locations were recorded and notified to a central database. This would allow movement tracings to be undertaken to greatly increase the ability to accurately establish the locations that animals had been or were on.
- 2.3 The outcome of these domestic discussions was the introduction of the Scottish Animal Movement System (**SAMS**) on 18 February 2002. The five main elements of SAMS are:
  - Baseline tags and tattoos
  - Movement tags

- Replacement tags
- Movement Documents (**MDs**)
- Notification of movements to the Scottish Animal Movement Unit (**SAMU**)

**2.4** In recognition of the importance of the developing EU legislation, industry stakeholders have for over 2 years been heavily involved in discussions with SEERAD on obtaining an outcome from the Commission which was both practical and enforceable for Scotland. SEERAD were represented at EU Council Working Group meetings in Brussels where intense lobbying and discussion with other Member State (MS) officials ensured they fully understood our concerns on the impracticalities of the initial draft proposal of 21/2004 for the Scottish system. Throughout this process, SEERAD officials continually discussed with industry stakeholders the proposal's progress and any issues that were viewed as being impractical for Scotland due to the specialised and stratified nature of our sheep industry. We also hosted visits from Commission officials and Spanish counterparts who were able to see for themselves the difficulties the draft proposal had for our industry.

**2.5** Regulation 21/2004 was finally adopted by the Council of Ministers in December 2003 with most of the elements which would be problematic for the Scottish industry negotiated out. The most important change being that Member States could apply for a derogation to retain their current system instead of the double tagging required under the proposed new EU legislation. Some of the other successes include:

- Removal of the requirement to tag new-born animals within one month of birth
- No recording of the 12 digit baseline tag number for each move
- Delaying the introduction of individual Electronic Identification (EID) until January 2008 at the earliest

**2.6** EU veterinary Auditors visited the UK in January this year to assess the existing traceability systems before they could consider granting the above derogation to keep our current system. Only minor failures in the Scottish system were discovered during their visit and we were able to explain how they occurred and that steps would be taken to ensure they were not repeated.

**2.7** SEERAD and SISG members have been aware for some time that there are other elements of SAMS that require minor changes to comply with the new EC legislation. The EU Auditors also identified the same shortcomings and some additional requirements and these have been included in the revised system. Some of the additional requirements arising from the Audit are still being discussed and are yet to be agreed with SISG members as indicated in the following paragraphs which describe the proposed revised system to be introduced from October 2005.

### **3. Proposed revised system from October 2005**

- 3.1** Due to the EU delay in responding to the UK derogation application, new Scottish legislation for EC Regulation 21/2004 will not be in place until October 2005. Until then it is critical that keepers continue to comply with the current system. A description of the current system is given in Sections 4-8 along with the minor changes that are likely to be required from October. SEERAD would welcome your views on the revised system and in particular where specific questions are listed. *See also Section 10 on page 13*

### **4. Registration of a location where sheep or goats are kept**

- 4.1** Currently it is a legal requirement that any person who starts to keep sheep or goats must within 30 days inform SEERAD via their local Animal Health Office (AHO). This keeper and holding information will be kept on the central (GB) holding register. If the holding where animals are being kept does not already have a location identifier (CPH), then one will be allocated. On receipt of this information, a flock/herd mark will be allocated for each location where sheep and goats are kept. Any change to holding or keeper information must be notified by the keeper to the AHO within 30 days. Markets and abattoirs are also required to meet these registration obligations.
- 4.2** After 9 July 2005, each keeper must also provide SEERAD with details of their occupation and the type of production (meat or milk) undertaken at the location. Hauliers are exempt from this requirement. An exercise will be undertaken in the coming months to obtain this information from existing keepers.

### **5. Holding Register (Flock/Herd Book)**

- 5.1** Currently a flock/herd book is required for each CPH (including markets and abattoirs) and should be available at all times for inspection purposes. The system requires that movements on and off the location are recorded in the holding register within 36 hours of the move taking place. Details required are: date of the movement, total number of sheep/goats in the batch, either the temporary mark or the baseline UK flock/herd-mark of each sheep/goat or the unique individual number of each sheep/goat and the holding the animal/s came from or went to. For sheep/goats moving direct from a market the lot number allocated by the market must also be recorded. The keeper must also count the number of sheep and goats on the holding on 1 January each year and this must be recorded in the flock book by 31 January; markets and abattoirs are exempt. These records must be kept for 6 years.

**5.2** After October 2005: We understand that the requirement for one register per CPH location may be problematic for some keepers. Similarly we know there are some instances where two or more CPHs actually cover one epidemiological unit when only one CPH may be required. An exercise will be carried out to identify these locations to ensure we achieve a balance between what is practical on the ground and disease control needs. Further discussions with SISG members will be held during the consultation period to finalise this aspect of the system. This includes specific meetings with crofting representatives to cover the movements between crofts, common grazings and apportionments. See Section 9.

**5.3** The following new information must be kept in the holding register:

**5.3.1** Both the CPH and address of the location, the type of production (milk or meat), name and address of keeper (this may differ from the location details). The holding register must also contain details of any replacement tag (see 6.12) that has been applied on the holding; markets and abattoirs are exempt from this as they are not classed as permanent keepers.

**5.3.2** Movement off a location including markets – Name of transporter, registration number of the haulage vehicle plus address and/or CPH of the destination location .

**5.3.3** Movement onto a location – the CPH of the departure location (address is not sufficient).

**5.3.4** Temporary marks are no longer required in the Flock book as they are not official types of identification

**5.3.5** The new Regulation requires every permanent keeper (having animals for more than 30 days/year) to record the number of animals on the holding on a specific date each year and provide SEERAD with this inventory data within 30 days. Markets, abattoirs, shows, exhibitions and veterinary practices or clinics are exempt from this requirement.

**5.3.6** We are still considering the best date for counting the animals. January 1 is the date that has been traditionally been used but this may be unsuitable for some sectors of the industry.

Question: *Is the 1 January date appropriate or can you suggest another date that would suit all industry sectors. See Section 10 on page 13*

**5.2.7** We are still considering the best method of returning this inventory data to SEERAD; options include e-mail, automated telephone system, fax or by post.

Question: *How do you think the inventory return should be sent to SEERAD bearing in mind that not all keepers have access to some of the above methods of communication. See Section 10 on page 13.*

**5.4** To assist keepers with the above requirements we have included a suggested format for a holding register at **Annex C**. Following initial comments from SISG members we are investigating the feasibility of allowing movement documents to be used in the holding register instead of duplicate recording. However it is important to remember that if the movement documents are kept for this purpose, they would be required during any official inspections. An inability to provide properly completed MDs to an inspecting officer would be a breach of the holding register requirement of EC Regulation 21/2004 and this may have an impact on any claims under SFPS – see Section 1.2 on page 3.

## **6. Identification requirements**

### **6.1. Tattoos**

**6.1.1** Under EU Regulation 21/2004 any animal born after 9 July 2005 can only have an ear tag applied as the primary means of identification; **tattoos cannot be used**. However they can still be applied for management or pedigree purposes.

### **6.2 Ear Tag Allocation System (ETAS)**

**6.2.1** Initially the keeper will continue to be responsible for ensuring that the individual identification number applied to each animal is unique. Please keep a record of the numbers on the most recent tags you purchase. However in November 2005, GB will be introducing a computerised Ear Tag Allocation System (ETAS) similar to the cattle system currently operating. This will centrally allocate to ear tag manufacturers a number unique within the UK, thereby taking this responsibility away from the keeper. The current preference in Scotland is for 'leading zeroes' in the tag sequence and SISG members favour keeping this format e.g. UK 541541 000236.

*Question: Is it still beneficial to have leading zeroes on our baseline and replacement tags? See Section 10 on page 13*

### **6.3 Approval of Ear tags**

**6.3.1** The new EU legislation requires all official ear tags to be of a type approved jointly by SEERAD, DEFRA and NAWDEPC (Wales). This is to ensure they reach the minimum standard required by this new Regulation i.e. that they are made of non-degradable material, tamper-proof, easy to read throughout the lifetime of the animal and designed to remain attached to the animal without being harmful to it. They must also not be reusable and the official inscriptions must be non-removable.

### **6.4 Baseline UK marks – Identification at holding of birth**

- 6.4.1** Currently all animals must be identified with a baseline tag or tattoo before they leave their holding of birth for the first time - this includes moves to any grazing/wintering and onto/off common grazing. A tag must consist of the letters UK, followed by the holding's 6-digit flock or herd mark, and followed by a unique individual number of 6 digits.
- 6.4.2** After 9 July 2005 the following additional measures will be introduced for all animals born after this date. They must be identified with an approved eartag within nine months of birth for extensively reared or free-range animals (or six months for intensively reared animals) or before they leave their holding of birth, whichever comes first. *A tattoo cannot be used for animals born after 9 July 2005.*
- 6.4.3** After October 2005, only animals moving off a holding for the purposes of veterinary treatment and returning directly back do not need a baseline tag/tattoo
- 6.4.4** Baseline UK tags can be any colour except for red which is reserved for replacement tags (see 6.12 below).
- 6.4.5** Management information may be applied to these tags provided it does not affect or interfere with the legibility or sequence of the official identification number
- 6.4.6** Please refer to 6.6.1 for information on older unidentified animals
- 6.5 Baseline S tags and tattoos (unidentified animals not on their holding of birth)**
- 6.5.1** Currently older animals that are not already baseline tagged or tattooed and not on their holding of birth must have a baseline S mark applied prior to the animal leaving its current holding.
- 6.5.2** After October 2005, any animal not already baseline tagged or tattooed and not on their holding of birth must have a baseline S tag or tattoo applied before 31 December 2005 or sooner if leaving its current location. Please refer to 6.6.1 for a more detailed explanation.
- 6.5.3** After October 2005, only animals moving off a holding for the purposes of veterinary treatment and returning directly back do not need a baseline tag/tattoo
- 6.5.4** Baseline S tags can be any colour except for red which is reserved for replacement tags (see 6.12 below).
- 6.5.5** Management information may be applied to these tags/tattoos provided it does not affect or interfere with the legibility or sequence of the official identification number.

## **6.6 Animals born before 9 July 2005 and not currently baseline marked**

**6.6.1** All animals not already officially identified (tag or tattoo) will have to be baseline tagged before 31 December 2005 even if they are not leaving their current holding before this date. The type of baseline tag or tattoo to be applied depends on where the animal is currently located. See **6.4** and **6.5** above.

**6.6.2** This requirement arose from the January 2005 Audit findings. As our current system only requires single tagging the Auditors were concerned about lost tags giving reduced traceability especially on farms where there were also animals that had never been officially tagged. This is an area where SISG members have indicated concerns and further discussions will take place during this consultation period to achieve a practical solution that does not jeopardise our derogation to avoid double tagging.

*Question: It is hoped that the tagging of these older unidentified animals could be carried out while the animals have been gathered for other purposes. Is the 31 December date practical in terms of normal animal husbandry issues or can you suggest another date which is more suitable? Please remember that the Auditors will be returning in December this year to ensure we have taken steps to resolve this issue. See Section 10 on page 13*

**6.6.3** Animals that carry a mark which has the flock/herd number but no individual number should have the mark replaced with a baseline tag. The current tag's flock number will determine which type of baseline tag (UK or S) should be applied. See **6.4** and **6.5** above.

## **6.7 From 9 July 2005 - animals to or from a Northern Ireland location**

We intend to allow animals moving between Northern Ireland and Scotland to move in accordance with the identification rules in place in the territory of origin. This will mean animals going to NI must carry a minimum of a unique individual identifier - a tag or tattoo if born on or before 9 July 2005 or a tag if born after 9 July 2005. This does not include animals transiting NI to an ROI destination.

## **6.8 From 9 July 2005 – imported animals born in other Member States before 9 July 2005**

**6.8.1** An animal born in another Member State (MS) and brought into Scotland shall retain its original eartag(s) and identification number. However once it is in the UK, in all other respects, the rules that apply will be the same as for a domestic animal.

## **6.9 From 9 July 2005 - imported animals from a third country (non MS) born before 9 July 2005**

**6.9.1** Any animal imported from a third country (non MS) which after 9 July 2005 has undergone the checks laid down by Directive 91/496/EEC

and which remains within the UK, shall be identified with an F tag at the holding of destination. This shall be done within a period of 14 days of these checks and certainly before leaving the holding.

## **6.10 Animals for Intra-community Trade and Export including to ROI**

**6.10.1** Animals born on or before 9 July 2005 must comply with current identification rules before they can be exported or sent for intra-community trade. They must also comply with relevant export rules.

**6.10.2** Animals born after 9 July 2005 and destined for intra-community trade require two identical identification marks to be applied. The first means of ID must be an approved ear tag; the second can be either an ear tag or an electronic ID tag or for goats only, a pastern mark. The rules applying to animals destined for intra-community trade are exactly the same as for domestic animals until such time as they are about to leave the UK. This is the latest point at which the secondary official identifier must be applied to the animal. Animals arriving from another MS must be double tagged before they leave the exporting MS. Once it is in the UK, the rules that apply will be the same as for a domestic animal. The above includes animals to and from the Republic of Ireland that transit through NI.

## **6.11 Movement Tags**

**6.11.1** These tags were introduced following FMD and provide a visual way of identifying locations where an animal has been since it left its baseline holding. The Movement tag format is: S followed by the 6 digit Flock Number of the animal's current location e.g. **S 542541**. No individual number must be applied to this type of tag.

**6.11.2** Currently, prior to most types of movement from a location **other than where the animal was baseline marked**, the keeper must apply a movement tag – this includes all moves to a market. If preferred, the keeper can record the animal's full baseline tag or tattoo number in the holding register and on the movement document as an alternative to applying the movement tag. A maximum of three official tags (combination of baseline and movement type) can be applied. An animal with 3 tags already applied must have its baseline mark details recorded on the movement document before leaving its current location and in the holding register.

**6.11.3** After October 2005: For moves from a location **other than where the animal was baseline marked**. The keeper must apply an approved movement tag for all moves to grazing or wintering and to common grazing on the basis that the animal returns to the original holding. If the animal returns direct to the original location, no further mark is required for either the journey back or for subsequent moves from the original location – as long as the movement tag has not been lost or become illegible.

**6.11.4** After October 2005 the following types of moves are exempt from having to apply a movement tag:

- Where the move is from the baseline holding
- Where a move is to grazing, wintering, show and will return to original holding
- Returning to the original location from grazing/wintering or from common grazing where a movement tag had been applied at the original location.
- Short term moves to vets/clinics and for dipping or shearing if returning to the original location.

## **6.12 Replacement of tags**

**6.12.1** No means of official identification may be removed without prior official permission. The replacement requirements for each tag type is as follows:

### Baseline tag replacement

**6.12.2** Animal still on its holding of birth: If the UK baseline mark has become illegible or has been lost, the keeper must replace it as soon as possible. The two options are to replace it with an eartag bearing an identical mark (if known) or to replace the mark with a UK tag with the same flock mark but a different unique individual number.

**6.12.3** Where an animal is not on its holding of birth the keeper should replace the lost UK or S tag as soon as possible. The two options are to apply an eartag bearing an identical number (if known) or to apply an R tag bearing the code UK, followed by the flock or herd mark of the holding on which the identifier is discovered missing or illegible, followed by a 6 digit individual number, followed by the letter R. The identification number must be unique to the animal and the tag must be red. Any animal bearing an R tag is not eligible for intra-community trade

**6.12.4** Animals imported before 9 July 2005: As these animals would only have a single identification mark then the replacement rules would be the same as those applying to UK tags and domestic animals (see immediately above).

**6.12.5** Animals imported after 9 July 2005: If an animal born in another Member State after 9 July 2005 has been brought into the UK and one of its two identical eartags has become lost or illegible, the missing tag must be replaced with an identical tag.

### Movement tag replacement

**6.12.6** If a Movement tag has been lost or become illegible the keeper can replace it only if he knows the flock or herd mark on the eartag. The

new approved tag must display the same details as the tag being replaced. If the tag details are not known a replacement is not required  
Format is S 541541.

**6.12.7** Information about all replacement tags must be recorded in the holding register (flock book) within 36 hours of the replacement being made.

**6.12.8** Operators of markets and slaughterhouses are not obliged to replace lost tags. We propose that the responsibility for replacing tags lost at or on the way to a market rests with the next keeper of the animals.

*Question: What are your views on the new keeper being responsible for replacing lost tags? Will this give accurate traceability and how can the industry ensure this action is carried out? See Section 10 on page 13*

## **7. Movement Documents**

**7.1** Currently keepers need to use a Movement Document (MD) for most types of sheep and goat moves including 'within-business' moves. Before the journey commences, the keeper at the departure location must provide details of both departure and destination locations, the flock number of the departure location, the total number of sheep travelling and the keeper's contact details. They retain one copy of the MD and the other copy must travel with the animals to the new location where the receiving keeper must check the details given are correct and complete the MD with the date of arrival and their contact details.

**7.2** After October 2005 all movements will require the use of movement documents – including common grazing (see section 9), dipping and shearing moves. The only exception is if one location is a veterinary surgery/clinic.

**7.3** A re-designed MD to take in the additional EU requirements will be distributed by SEERAD to keepers in early autumn, must be used for all moves. **A copy of the proposed new MD is at Annex D** At least one copy of the MD must travel with the animals and be handed to the receiving keeper by the haulier.

**7.4** As well as the detail required under the current system, the following additional information must be stated prior to departure: CPH of the departure location, name and address of the keeper (this may differ from the animal's departure location), the address and or CPH of the destination location, date of departure and details of the transport used.

*SEERAD welcome your comments on suggested changes to the layout and size (A4 or A5) and whether the new MD should be in duplicate or triplicate (extra copy for the haulier?) See Section 10 on page 13*

**7.5** Receiving keepers will be required to retain a copy of each movement document for a minimum of 6 years.

## **8. Movement Reporting**

**8.1** Currently for movements to and from a Scottish market or to a Scottish abattoir the movement data supplied by the keeper is transmitted by the market or abattoir to SAMU (Scottish Animal Movement Unit). No separate notification is required by the keeper. Moves to any English or Welsh location are notified by the receiving keeper.

**8.2** However sheep arriving at a Scottish location from any other Scottish location (other than a market) or from any English or Welsh location must be reported to SAMU by the receiving keeper within 3 days of the animals arriving.

**8.3** After October 2005 the only types of move which do not have to be reported are when animals move to a vets surgery or clinic or to tattooists. See section 9 on moves involving common grazing.

### **8.4 Sheep moving to Northern Ireland or another Member State**

The keeper at the Scottish departure location has sole responsibility for reporting this type of move to SAMU within 3 days of the move taking place including details of the receiving location. This is in addition to normal export requirements.

### **8.5 Sheep arriving from Northern Ireland or another Member State**

The keeper at the receiving location has sole responsibility for reporting this type of move to SAMU within 3 days of the animals arriving and must provide full details of the departure location.

## **9 Crofting and common grazing issues**

**9.1** Following the January 2005 Audit visit, we have been asked to tighten up the current derogation given to crofters on some identification and reporting requirements. These have been highlighted in the appropriate earlier sections of this consultation paper. To ensure the Auditors' required changes can be carried out in an effective and practical manner we will be meeting with crofting representatives during the consultation period to agree a sensible outcome.

## **10 Partial Regulatory Impact Assessment (RIA)**

**10.1** We have assessed the impact the proposed legislation would have on industry and prepared a Partial RIA which is attached at **Annex B**.

## 11 Responses

Please see the following list of questions that you may wish to consider responding to. This is only a guide and we would welcome comments on any other areas of this consultation document. **Annex E** gives details on how to respond.

- 11.1 EC Regulation 21/2004 requires keepers to submit an annual inventory to SEERAD declaring the number of animals present on the holding on a set date. Is 1 January a suitable date for industry ?
- 11.2 Methods of submitting this data include e-mail, automated telephone system, fax or mail. SEERAD would welcome your views on the best method to ensure that all keepers submit this data accurately?
- 11.3 UK and S baseline tags require a unique individual number – currently this must be a 6 digit number. This sequence often contains leading zeroes e.g. 000234. Would you be content for this format to continue after 9 July 2005 or would you rather tags did not display leading zeroes?
- 11.4 All animals not already officially identified will have to be baseline tagged before 31 December 2005. Is this a suitable date from a husbandry point of view?
- 11.5 The keeper at the next location after the market has responsibility for re-tagging sheep that lose their tag on the journey to or at a market. SEERAD would like to hear your views on this issue.
- 11.6 A new design of movement document is required after 9 July 2005 as more information is required, including compulsory haulier details. Do you think this form should be in duplicate (as currently) or triplicate?
- 11.7 A new design of movement document is required after 9 July 2005 as more information is required, including compulsory haulier details. Would you find an A5 (current) or A4 size more user-friendly?
- 11.8 **Annex C** shows the proposed Herd/Flock Register. Attached to it are Guidance Notes and we would welcome your comments on the clarity of these notes in relation to the keeper's responsibility and required actions.

Livestock ID & Traceability Branch  
SEERAD  
11 August 2005

## ANNEX A

### LIST OF CONSULTEES

ALIDMA (All Ear tag manufacturers)  
Animal Health Distributors Association  
Animal Health Trust  
Animal Transportation Association  
Associated AI Centres  
Association of Meat Inspectors (GB) Ltd  
Association of Port Health Authorities  
Association of Show and Agricultural Organisations  
British Goat Society  
British Veterinary Association  
Compassion in World Farming  
Consumers Association  
COSLA  
Crofters Commission  
Farm Animal Welfare Council  
Health and Safety Executive -Scotland  
Institute of Auctioneers and Appraisers Scotland  
NFUS  
National Federation of City Farms  
National Sheep Association – Scottish Region  
Quality Meat Scotland  
Rare Breeds Survival Trust  
Road Haulage Association - Scotland  
Royal College of Veterinary Surgeons  
SAC (Scottish Agricultural College)  
SAMW (Scottish Association of Meat Wholesalers)  
SAOS  
SCF (Scottish Crofting Foundation)  
Scottish Rural Property and Business Association  
Sheep Veterinary Association  
SSPCA  
Tenant Farmers Association  
United Kingdom Agricultural Supply Trade Association

**PARTIAL REGULATORY IMPACT ASSESSMENT FOR  
SCOTLAND ON COUNCIL REGULATION (EC) 21/2004  
ESTABLISHING  
A SYSTEM FOR THE IDENTIFICATION AND  
REGISTRATION  
OF OVINE AND CAPRINE ANIMALS**

Author: Alistair Henry  
Version: 1.1  
Issue Date: **11 August 2005**

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## **1. Title of Proposed Council Regulation**

1.1. Council Regulation (EC) 21/2004 (“the Regulation”) establishing a system for the identification and registration of ovine and caprine animals and amending Regulation (EC) No 1782/2003 and Directives 92/102/EEC and 64/432/EEC. The Regulation applies throughout the United Kingdom. This RIA applies only to Scotland (see paragraph 2.3.4.).

## **2. Purpose and intended effect of measure**

### **2.1. The objective**

2.1.1. To provide an improved system of identification to aid traceability of sheep and goat movements and to link rules to the payments of EU subsidy.

2.1.2 Devolution: This is a devolved matter which affects all parts of the UK. Separate, but parallel, legislation will be needed in England and Wales. Northern Ireland may apply a different system and will have to draft and implement legislation accordingly.

### **2.2. Background**

2.2.1. The Foot and Mouth Disease (FMD) outbreak which occurred in the UK in 2001 demonstrated the need for improvements to the identification and traceability rules that applied to sheep and goats at the time. Scotland was the first area to bring the outbreak under control and consequently came under pressure from industry to relax some of the movement restrictions that had been introduced to deal with the emergency situation. Industry was keen to allow animal movements to begin so that the normal production processes could be resumed and farmers could move their livestock. However the State Veterinary Service (SVS) would not consider this until an improved identification and traceability system was introduced which had the full support of industry. The elements of a new system had to be both practical and enforceable.

2.2.2 Around this time we became aware of emerging views from the Commission which focussed on establishing an identification and registration system for ovines and caprines (sheep and goats). The basic EU requirements were considered and discussed with industry to see how we could establish a system featuring the broad outlines of what was likely to become a legal requirement in the coming years. Following intense discussions with industry representatives on our Sheep Industry Stakeholder Group (SISG), major enhancements to the pre-FMD identification and traceability requirements were made. This resulted in the current domestic identification and batch traceability system - introduced in February 2002 - which provides the main platform for meeting (and in some cases exceeding) the objectives of this new EC Regulation.

2.2.3. One of the basic objectives of the Regulation is the tracing of animals which is of crucial importance in the control of contagious diseases. The original proposal stated that ‘It must be possible to determine rapidly and conveniently the place of origin of an animal or carcass and its movement throughout the Community. Animals must be adequately identified and registered according to the same requirements throughout the Community.’

2.2.4. SEERAD was represented during the EU Working Group meetings in Brussels where the UK fought hard to secure some vital concessions to elements of the original proposal which were unworkable for the UK sheep industry. The most important one was the option to apply for a derogation which would allow us to continue with our current batch system.

2.2.5. In December 2003 the Regulation was adopted. This requires Member States to double identify all sheep and goats born on or after 9<sup>th</sup> July 2005, except those intended for slaughter at less than 12 months of age and those not intended for export or intra-community trade. There is however a provision under which the Commission may allow Member States to maintain their existing national identification system providing traceability between holdings can be demonstrated. If such approval could be obtained, our existing system of identification could – with minor modifications - be retained until 1<sup>st</sup> January 2008 when electronic identification (EID) becomes mandatory (although there is provision within the Regulation to review this date in June 2006). The Regulation also requires movement documents to be completed and to accompany the animal during transit, for keepers to maintain holding registers and for the Competent Authority to maintain a central database of holdings from July 2005 and movements from January 2008. Our current system already meets most of these requirements; only minor modifications will be required to comply.

2.2.6 Commission officials visited the UK in January 2005 to assess our current system and the minor proposed changes we planned to introduce. On 5 July they announced that the UK had secured a **temporary** derogation until 30 April 2006 but that they would re-visit in December 2005 to ensure we had introduced the changes that were required and to assess compliance levels. If satisfied, a full derogation would be given until (at least) January 2008.

### **2.3. Risk assessment**

2.3.1 This risk assessment only considers the period between July 2005 and December 2007. It does not consider the possible introduction of EID from January 2008. There are still a number of unresolved issues surrounding EID and further discussion at EU Council level is expected to take place mid 2006. Another RIA will be produced to consider EID as soon as it is practical to do so and at a later date a further consultation exercise will take place covering the introduction of EID.

2.3.2. The Regulation is intended to standardise and improve the identification and traceability of sheep and goats across the European Union. It is intended that it will provide an effective identification system that enables animals to be traced quickly and effectively back to their holding of origin (birth). Double tagging helps ensure the identification of an animal's birth holding as it is unlikely that both tags will be lost at the same time. However the main measures to ensure the effective tracing of animals movements do not come into effect until EID becomes mandatory in 2008. Therefore in the period July 2005 – December 2007, the Regulation does not impose an effective system of traceability between holdings. This is a particular risk in Scotland where animals may make many movements in their lifetime. SEERAD believe it is more critical to be able to trace all the movements made by an animal than to be absolutely certain about its holding of origin. It was largely for this reason that the UK negotiated to include in the Regulation a derogation from double tagging that would enable Member States to continue with their existing systems until 2008. Following FMD, measures were taken to improve our national system and we now consider it to be more effective than the measures – including double tagging - required by the Regulation.

2.3.3. When EID is introduced it will greatly assist in the control measures in the event of disease outbreaks such as FMD. This is because it introduces the recording of individual animal movements - a measure that is not practical in Scotland without EID because of the large number of animals and movements. Failure to trace animals quickly and effectively during an outbreak of disease will mean that the number of disease cases is likely to increase and the cost of eliminating the disease will be higher. This would in turn mean greater movement restrictions being placed on industry, and may result in them being unable to carry on with their day-to-day business. There was also a significant impact on other aspects of rural life during the 2001 FMD outbreak and any measure to reduce the length and severity of any future disease outbreak will be of benefit to the wider rural community.

2.3.4. The United Kingdom is required to implement and enforce the Regulation when it takes effect in July 2005. The Regulation however provides Member States with a number of options for implementation, including crucially the option of applying for a derogation from double tagging until 2008. This RIA describes the options available to Scotland for the period October 2005 – December 2007 (prior to the proposed implementation of EID) and compares the impact of each on the industry in Scotland and on the Scottish Executive. England, Wales and Northern Ireland (DARDNI) will be consulting their industry on the basis of their own Regulatory Impact Assessments. DARDNI have decided to implement the legislation in a different manner to the rest of the UK, based more on the identification system adopted in the Republic of Ireland. Applications for a national derogation from double tagging were made separately in respect of GB and Northern Ireland.

2.3.5. In ensuring that the chosen implementation option is both workable and practical the Scottish Executive recognises the need to take account of the size of the sheep industry in Scotland (8.1 million just after lambing), its stratified nature and the large number of sheep movements. However failure to implement European Union legislation could lead to the initiation of a case against the UK Government in the European Court of Justice, and affect our ability to trade with other Member States. There is furthermore a risk of disallowance at national level if a Member States fails to implement in full the provisions of this Regulation as it is a cross compliance measure of the Single Farm Payment Scheme (SFPS).

**2.4 Benefits:** Minimal as current system already provides (and in some situations exceeds) the traceability that 21/04 desires.

**2.5 Business sectors affected:** All sheep and goat keepers including those with only one animal. Markets and slaughterhouses handling sheep and goats will also be affected. There are estimated to be 22,000 sheep keepers and 800 goat keepers in Scotland. There are 29 (some seasonal) livestock markets in Scotland and 32 abattoirs which deal in sheep and goats.

### **3 Description of options**

3.1 Three options were identified for possible implementation in Scotland. One option (2) would give keepers the choice of implementing the Regulation in full i.e. allow the application of double identification (primary ear-tag plus either another ear-tag *or* a tattoo *or* an electronic identifier *or* [for goats only] a pastern mark). Following Legal advice and discussion with members of SISG it was decided that Option 2 should not be offered as it would lead to confusion with Option 3 and mean that two very different identification and traceability systems would exist in Scotland after October 2005. Ultimately this would

reduce the level of traceability that currently exists in Scotland. Consequently only 2 options have been identified as suitable for implementation of the Regulation in Scotland. These have been numbered Options 1 & 3 to correspond with the Options in the Defra RIA and avoid confusion when industry discuss both RIAs

Option 1 – Continue with present system with minor changes

Option 2 – Not considered suitable for Scotland

Option 3 – Introduce the Regulation but secure the national derogation which would allow us to continue with a system similar to the one currently operating.

### **Option 1**

3.2 Do nothing. The domestic controls on sheep and goat identification were reviewed following the FMD outbreak. The existing domestic requirements go further than the previous EU requirements contained in Council Directive 92/102/EEC and already implement many of the changes required by EC Regulation 21/2004 (i.e. movement documents, holding registers, central database recording holdings and movements). However, the current system does not include double identification – it is based on a single means of identifying each animal. Even allowing for the granting of the derogation, the current Scottish batch system is lacking some of the required elements of Reg 21/2004 e.g. the need to tag animals no later than 9 months after birth. For this reason minor changes would be required anyway to ensure we do not risk cross compliance disallowance under the SFPS.

### **Option 3**

#### **Sheep**

3.3 Introduce the Regulation, but apply for and obtain a national derogation from double identification until 1 January 2008. This option requires the Member State to have demonstrated that its national system provides traceability between holdings before the Commission will consider granting a derogation from double tagging. In this event the Member State is allowed to continue using its national system until 1 January 2008. In order to gain approval from the Commission however, it will be necessary for Scotland to make minor changes to the existing Scottish system to ensure we can deliver the required traceability.

3.4 The main requirements of the current system are:

- Keepers must ensure that any location keeping sheep or goat/s is registered with the local Animal Health Office
- Animals should be identified with a baseline ear tag or tattoo before they leave their current holding
- Any lost tags are likely to require a Replacement tag to be applied
- For certain types of moves, keepers will also have to apply Movement tags
- The keeper at the departure location must ensure that a Movement document is completed and accompanies the animal/s on their journey
- The keeper at the receiving location must forward a copy of the details on the Movement Document to the central database within 3 days
- Details of movements on and off the location must be recorded in the flock register

### 3.5 Changes required to the current system to meet the requirements of Regulation 21/2004:

- Tattoos can no longer be used as the primary means of identification
- Animals have to be identified no later than 9 months after birth if kept in extensive or free-range conditions – 6 months if kept in intensive conditions.
- Only officially approved ear tags can be applied.
- Issuing of tags will be controlled by an Ear Tag Allocation System (ETAS) to ensure manufacturers only issue tags with unique numbers - similar to the cattle system.
- Minor changes to the movement document are required including details of the haulier involved. (Currently these details are not mandatory).
- Additional information has to be kept in the location's flock register including details of the person transporting animals from the location
- Keepers will be required to record the CPH (County/Parish/Holding) of the location they receive animals from in the location's flock register.
- Keepers are required to make an inventory of the animals kept at the location on a set date annually. This data must then be sent to SEERAD within 30 days. SISG are involved in deciding the best method of this data being forwarded by the keeper to SEERAD.

3.6 We have also identified one area of the current system which is causing confusion amongst keepers and after discussion with SISG intend to make the following change which will give increased traceability between locations. From 9 July 2005, Movement tags will have to be applied for all moves from non-HOB locations. This includes moves to grazing/wintering and all moves direct to a slaughterhouse – previously Movement tags were not required for these types of moves.

3.7 Subject to further discussion at Council level in June 2006, mandatory EID is scheduled to be introduced in 2008, as required by the Regulation. A further RIA and consultation exercise will follow prior to the introduction of EID.

### **Goats**

3.8 Option 3 would require goat keepers to apply ear tags (rather than tattoos) to goats born after 9 July 2005 as the primary means of identification. The cost of purchasing and applying a single long-life ear tag is £0.84 as opposed to the approximate cost of £1.00 for applying a tattoo, giving a possible cost reduction.

3.9. The issue for goat keepers however is more about cost than welfare and any resulting welfare problems with eartags may offset the small savings achieved. There is anecdotal evidence that keepers inexperienced in applying eartags can experience higher levels of welfare problems. Guidance will be issued on how best to apply eartags, but this may be a welfare issue, particularly in the short-term.

## **4. Brief assessment of options**

### **Option 1**

4.1. This option maintains the status quo. Like the Regulation it provides a batch system of traceability, but it would not meet all the requirements of the new legislation. Failure to fully

implement the Regulation is likely to result in infraction proceedings against the UK Government and could affect our ability to trade within the EU. In addition, as the Regulation is a cross compliance regulation for SPFS there is a near certainty of disallowance at national level if its requirements are not fully implemented.

### **Option 3**

4.2. This option involves implementing the Regulation, but applying for and obtaining a derogation from double tagging until 1 January 2008. This would mean the continuation of the existing system in Scotland until 2008, with minor amendments in order to meet the requirement of the Regulation. The derogation would protect farmers from double tagging until EID is introduced in 2008. This would represent a saving to most of the industry, but represent additional cost to others. (see Section 5.4.1. below).

4.2.1 There are minimal changes required to the current system for sheep keepers. These have been listed at 3.5 and 3.6 above.

4.2.2 There are minimal changes to the current system for goat keepers. However tattoos can no longer be used as the primary means of identification for kids born after 9 July 2005. This is likely to be seen as problematic by some goat keepers but there are numerous examples of herds which successfully use ear tags without experiencing welfare problems.

4.3. **This option complies with the Regulation** (should the Commission grant the derogation requested), so the risk of disallowance is minimised.

## **5. Costs for business, charities and voluntary organisations**

### **5.1. Compliance costs**

5.1.1. We have not costed Option 1 because it does not comply with the Regulation and the risk of disallowance and infraction proceedings resulting in daily fines as a result of non-compliance is considered too great. The following costs are therefore for option 3 only and show the increased cost over and above operating the existing system (Option 1).

5.1.2. Costs are calculated as accurately as possible but quantifying numbers of animals for certain movement categories has been difficult as this type of data is not generally available. It is also not possible to break down the proportion of animals which would still be on the holding on which they were born at 9 July 2005 or moved off after then. Estimates are generally based on 2003 figures which are the latest available and follow discussions with industry sources.

5.1.3. Estimates and assumptions have been used to inform the development of the policy and to understand the potential scale and nature of the impact of the Regulation. It should be noted however that costs are sometimes based on estimates rather than established facts. It should therefore be borne in mind that there may be a substantial margin of error applying to the final figures.

5.1.4 Goats: As explained earlier there are minimal additional material costs. It is even possible that Option 3 will reduce some costs for goat keepers.

## 5.2 Option 3

5.2.1 The identification system introduced under Option 3 would be similar to the existing system. However there are a few minor changes that would be introduced to tighten up on visual traceability. These changes are as follows:

- Sheep not on their baseline location and moving direct to an abattoir will require to have a Movement tag applied before the move commences. Under the current system a temporary mark is sufficient; however temporary marks will not be recognised as an official method of identification after October 2005.
- Sheep not on their baseline location and moving to another location for grazing, wintering etc. will require to have a Movement tag applied before the move commences. This applies even when the animals are returning to the original location. This is not an additional cost as the animal will have to be movement tagged before it leaves the holding the next time including if moving to a market or abattoir.

These changes now mean that before the animal leaves its non-baseline for the first time for any type of movement it must have a Movement tag applied.

5.2.2 There are approximately 3.9 million Scottish sheep slaughtered annually. Industry estimates are that 15-20% (585,000- 780,000) move direct to a slaughterhouse. Under this proposed change it is difficult to identify approximately how many of these would now require a Movement tag if they are moving from a farm which is not their holding of birth direct to a slaughterhouse. Taking a figure of 10% of the total killed annually then an **additional 390,000** Movement tags need to be applied annually for sheep moving direct to slaughter from a location that is not their holding of birth.

5.2.3. It is therefore estimated that an additional 390,000 Movement tags will be required under Option 3, compared to the current system. It is assumed that these would be made using cheaper tags that can be purchased from tag suppliers. The average cost of purchasing and applying a short-life tag is £0.64 (a long-life tag would cost £0.84). Therefore the total cost of applying the additional Movement tags is approximately **£250,000** (390,000 x £0.64) It is worth noting the cost of applying Movement tags would fall disproportionately on finishers as opposed to breeders.

5.2.4. These Movement tags would be replacing temporary marks for this type of move. The cost of applying a temporary mark is approximately £0.11 (material and labour), so using the figures above there is a potential **saving of £42,900** (390,000 x £0.11).

5.2.5. Therefore the approximate cost of **£250,000** for additional movement tags would be offset by a possible saving of **£42,900** giving a net increased cost of approximately **£207,100**.

5.2.6. Under this option, sheep or goats born after 9 July 2005 and intended for intra-community trade would need to be double identified. However since numbers are relatively low (<10,000 animals), and it is not possible to determine at which location the animals will be double (as opposed to single) identified, these animals have been left out of the calculations.

5.2.7 Sheep moving between Scotland and Northern Ireland – in either direction – should comply with the ID requirements of the country of despatch. Those transiting NI en route to or from the Republic of Ireland will require to be double identified if born after 9 July 2005.

### 5.3 Government costs

5.3.1. To ensure that sheep and goats are allocated unique individual identification numbers it will be necessary to set up a new Eartag Allocation System (ETAS) alongside the one already operating for cattle and run by the British Cattle Movement Service (BCMS). This system would be developed for the whole of GB, so costs would be apportioned based on the number of animals in each country. Consequently, **Scotland pays 24% of total GB costs.**

5.3.2. The development of a new web-based ETAS system would cost approximately £1.1m. There would also be a £50,000 set up cost incurred by the BCMS. Scotland's share of these costs would be **£276,000.**

5.3.3. There would be ongoing annual maintenance and staff costs to operate this system. These are estimated to be in the region of £700,000 p.a. for BCMS and £100,000 for IT maintenance. Scotland's share would be **£192,000.**

5.3.4. In addition, an eartag approval system will also be required. A specification for the approval of sheep tags will need to be drawn up. This is estimated to cost in the region of £40,000 (**£9,600 for Scotland**). Staff costs are expected to increase by around £26,000 p.a. (Scotland's share **£6,240**).

5.3.5. There will also be additional enforcement costs, but as the inspection and enforcement rules have still to be established, these costs cannot yet be quantified.

5.3.6. SEERAD currently has access to a central computerised register of holdings and will be linked to a GB movements database (AMLS 2) in the near future. However both of these databases require upgrades as additional data fields are required by the new Regulation. It is estimated that for Great Britain there would be initial set-up costs of £60,000 and running costs of £168,000 p.a. Scotland's share of these costs would be **£14,400** for set-up and **£40,320** p.a. running costs

5.3.7. Because the Regulation is a cross compliance requirement under the SFPS there is a risk of disallowance if farmers do not comply fully with the requirements. The amount of any disallowance would depend on the degree of failure to comply by the industry or Government. **£57.61m** was paid in direct sheep subsidy payments to claimants in Scotland for 2004.

### 5.4. Costs for two typical businesses of implementing Options 1 or 3

5.4.1. The costs for two typical farm businesses of implementing Option 1 have not been calculated as the level of disallowance under SFPS for failing to meet this cross-compliance requirement cannot be accurately calculated.

5.4.2. The costs for two typical farm businesses of implementing Option 3 have been calculated using 2 different farm types with the following profiles.

**Farm A:**

A typical medium sized upland holding with 600 home-bred ewes. The lambing rate on average is 125%; therefore 750 newborn lambs are produced annually. 80% (600) of the newborn lambs are moved on for fattening with 20% (150) being retained to replace the breeding stock. A similar number (150) of breeding stock are moved off for slaughter each year. It has been assumed that 150 animals are moved to grazing/wintering. Under Option 3 there is no obvious annual cost increase for this type of business.

TABLE 1 - ESTIMATED ANNUAL COST INCREASE FOR MOVE FROM CURRENT SYSTEM TO SINGLE TAGGING UNDER THE DEROGATION

	Cost
Increased costs for Farm A business	NIL
Total cost increase under Option 3	NIL

**Farm B:**

A typical medium lowland holding with 1000 ewes. The lambing rate is 165%; therefore 1650 lambs are born annually. 85% (1400) of the newborn lambs are moved off for fattening with 15% (250) being retained to replace the breeding stock. A similar number (250) of breeding stock are moved off for slaughter each year. The keeper also buys in a further 1000 lambs each year for further fattening for about six months before later going for slaughter.

TABLE 2 - ESTIMATED ANNUAL COST INCREASE FOR MOVE FROM CURRENT SYSTEM TO SINGLE TAGGING UNDER THE DEROGATION

	Cost
Cost of having to apply Movement tags for 1000 bought-in lambs <b>IF</b> moving direct to slaughter. Cost = 1000 x £0.64 = £640. Moves to slaughter via a market = no extra cost	£640.00
Savings from not having to apply temporary marks for 1000 lambs moving direct to slaughter. Cost = 1000 x £0.11	£110.00
Total increased cost	<b>£530.00</b>

5.4.3. These figures show that the impact of Option 3 on Farm B is more significant. This is because it buys in 1000 lambs each year for further fattening which - if being sent direct to slaughter - will require to have Movement tags applied. *Under the current system this is not required.*

5.4.4. The differences in the impact on these two farms illustrate how different business types will be affected depending on the nature of their operation. Breeding businesses will be least affected and those that buy in many or all of their animals will be most affected.

**5.5. Issues of equity and fairness**

5.5.1. The Regulation is directly applicable in all Member States. Its aim is to improve on the existing requirements with regard to the identification and traceability of sheep and goats. The most difficult and controversial changes will be introduced in January 2008 when EID becomes mandatory (though the Council will review this date in June 2006). However, this RIA is only concerned with the changes prior to the introduction of EID.

5.5.2. The major concern for the sheep and goat industry with the provisions that come into force in October 2005 is the requirement for double identification (which would mean double tagging for every breeding sheep and goat born after 9 July 2005). Separate applications have been made in respect of GB and Northern Ireland for a derogation from double identification until 2008 on the basis that the existing national system provides the required level of traceability between holdings that the Regulation seeks to deliver.

5.5.3. The UK has the largest number of sheep of any Member State and also moves each sheep more times on average than any other Member State. 22.5 % of the UK sheep flock is located in Scotland. Given that this Regulation is a cross-compliance requirement of the SFPS, it is critical that Scottish sheep keepers comply with the chosen system when implemented.

5.5.4. As mentioned above in paragraph 5.4.2 the impact of Option 3 will be greater for those keepers that move a lot of animals and have many movements onto and off their premises. Therefore non-breeders will be disproportionately affected. Breeders will be least affected and hill and upland keepers are likely to be less affected than lowland keepers.

## **6. Consultation with small business: the “Small Firms Impact Test”**

6.1. A GB consultation exercise has already been conducted with small businesses, based on the original Commission proposals which involved double tagging of all animals, including lambs, and manual recording individual animal movements. A small business litmus test was sent out to a number of business owners to gauge the potential level of impact on the sheep and goat keeping industry as a whole. The test comprised of 11 questions designed to cover all eventualities. The number of recipients was 25, with 7 completed returns. **See Annex 6 for details.**

6.2. The responses indicated that recipients were primarily concerned about high costs and the additional time taken with record keeping. SEERAD was very concerned about the original proposals and following representation from and discussion with industry, the UK was successful in negotiating out the most unacceptable parts. Consequently the final Regulation only requires animals born after 9 July 2005 and intended for breeding or for export to be double identified, does not require individual animal recording until EID is introduced. However it does provide Member States the option of applying for a national derogation to continue using the current domestic system until 2008. The UK applied for a derogation to retain its current system and recently received a **temporary** derogation until April 2006. EC Auditors will re-visit the UK in December 2005 and assess whether a full derogation can be granted – this would last until January 2008 when EID is due to be introduced.

## **7. Competition assessment**

7.1. The competition filter was carried out on sheep premises in GB. The results suggest that the proposed legislation is unlikely to have a negative impact on competition in this sector. The cost of compliance with the proposed legislation will be greater for larger sheep and goat units because they keep more animals. Headage costs should be broadly similar for all sizes of units.

7.2. Costs will also be higher for businesses that are buying in and selling a lot of animals. The cost of movement recording is more significant than primary identification costs. However, although the Regulation may result in some changes to the number of holdings, it should not lead to significant changes in the structure of competition within the market. (It is likely that the SFPS will have a bigger impact than changes under this Regulation).

7.3. A preliminary assessment indicates that the impact on costs varies significantly depending on the nature of the business. For keepers buying in many animals it is likely to be high when compared against the average net income for sheep keepers. 2003/04 net farm income figures from a limited SEERAD survey of businesses suggest that net income for specialist LFA sheep farms is **£9,894** and for cattle and sheep lowland farms is **£18,538**.

## **8. Enforcement**

8.1. The Regulation will be enforced by domestic legislation, which in Scotland replaces The Sheep and Goats Identification (Scotland) Regulations 2000 as amended.

8.2. It is proposed that responsibility for enforcing the new Regulation will rest with Local Authorities and SEERAD Agricultural staff. The new legislation is expected to result in increased enforcement costs, but at this stage they cannot be quantified.

## **9. Monitoring and review**

Feedback will be provided by the industry and by the enforcement bodies when the Regulation is adopted and implemented in Scotland – scheduled for October 2005.

## **10. Consultation**

### **Within Government**

10.1. Colleagues in the devolved administrations and Northern Ireland have been and will continue to be fully involved with progress in implementing Council Regulations 21/2004.

### **Public Consultation**

10.2. The main industry organisations have been invited to provide their views on options 1 and 3. Every effort will be made to ensure that the final package of measures is practical and workable for the Scottish industry.

10.3. This RIA provides estimates on the basis of the best information available and will now be issued for formal consultation with the main stakeholders. Should the results of the consultation exercise indicate that changes to the RIA are required a further RIA will be submitted to the relevant Committees for consideration.

10.4 A further RIA will be produced and another public consultation exercise undertaken before EID is introduced in 2008.

## 11. Summary

- 1.1 See annex 1-3 for cost summaries.
- 1.2 See annex 4 and 5 for Option summary and graph
- 1.3 See annex 6 for responses from the small business litmus test

11.4. The Regulation, adopted in December 2003, introduces in two stages the individual identification and movement recording of sheep and goats. From 9 July 2005 sheep and goats born after that date must be individually identified by two marks, and the primary mark must be an eartag. However, Member States can apply for a derogation from double tagging until 2008, if they can demonstrate that their existing system provides traceability between holdings. UK has applied for a derogation from the need to apply two marks and has requested authorisation to continue using its national system of identification at least until January 2008. The other measures which come into effect in 2005 won't have much impact in Scotland as they are already being applied. In January 2008, electronic identification is due to become mandatory for sheep together with the recording of individual animals on the movement document and the on-farm register. There is no requirement to individually record animal movements until 2008 – at the earliest. The January 2008 implementation date will be reviewed in June 2006.

11.5. Two options are described in this document:

**Option 1** – Do nothing to change our current system

**Option 3** – Apply for and secure a derogation from double tagging until EID becomes mandatory in 2008 (earliest) and make minor changes to our current system to ensure we meet the requirements of the Regulation which fall outside the derogation.

11.6. Option 1 is not recommended because it is considered politically unacceptable and too risky. Following the UK BSE and FMD crises, we cannot ignore new European legislation aimed at alleviating the risk in the event of similar disease outbreaks. There would also be a risk to exports by not implementing this EC regulation and likely infraction proceedings and there would be a near certainty of incurring disallowance.

11.7. **Option 3 is the recommended way forward.** It envisages that the UK secures a derogation from double tagging until January 2008. This would allow UK to continue with its current system of identification and traceability with minor changes until then. More importantly throughout the 2005-2007 period it will allow GB to continue to trace animals on a batch basis which is considered essential for the purpose of disease control.

11.8. The main drawback is the perceived complexity of the current system which some keepers appear to have found difficult to understand leading to possible compliance problems. However this is expected to improve following clarification of some elements, publicity campaigns and because the new Regulation is a cross-compliance requirement of the SFPS.

11.9. The increased cost to the industry of implementing option 3 has been estimated as **£250K** p.a. This is an increase of 4.6% on current costs and is mainly attributed to the extra cost of having to apply movement tags to animals going from a non-HOB direct to an abattoir. The total increased cost over the period 2005 – 2007 would be **£620,000** (£595,250 at present value).

11.10. UK applied to the Commission for a derogation from double tagging in June 2004. However, before a decision was taken, the Food and Veterinary Office (FVO) visited UK to inspect the current national system to ensure that it provides traceability between holdings. This visit took place 24-28 January 2005 and the decision to grant a **temporary** derogation until April 2006 was granted. The FVO will re-visit the UK in December 2005 to reassess the system and if their report is favourable a full derogation will be given. In light of the positive progress that has been recognised **it is recommended that Option 3 is pursued**. If we fail the December 2005 re-visit and our derogation application is rejected, then we shall have to implement the Regulation in full. If necessary a partial RIA will be produced to cover this situation.

## **12. Regulatory quality declaration**

I have read the Regulatory Impact Assessment, and I am satisfied that the balance between cost and benefit is the right one in the circumstances.

Signed:

MINISTER

**Contact person for this RIA**

Alistair Henry  
Livestock ID & Traceability Branch  
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SEERAD  
Pentland House  
47 Robb's Loan  
EDINBURGH  
EH14 1TY

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### Detailed Calculation of Sheep Identification Costs – Option 3

A1.1. Official Census figures for June 2003 indicate that in Scotland there were 8.04m sheep of which 3.86m were born in the 2003 breeding season. Around 75% (2.9m) of newborn lambs are slaughtered in their first year. The remaining 25% (0.96m) were retained as breeding stock. It is estimated that just under 1m of the breeding stock are also slaughtered giving a total of approximately 3.9m Scottish sheep slaughtered annually.

A1.2. The identification requirements in terms of applying a baseline (holding of birth) tag for all lambs born after July 2005 will be the same as the current regime, i.e. the application of a single tag. However under Option 3 certain types of moves will now require Movement tags to be applied. See A.1.5 below.

A1.3. Prices for single tags are around £0.40 (incl. VAT) and short-life (slaughter) tags for lambs cost around £0.20 (incl. VAT). Discounts can be obtained from suppliers for bulk buys.

A1.4. For labour costs associated with tagging, the following assumptions have been made:

- Tagging is a two-person operation.
- The cost of labour is £13.11 per hour (including all overheads) or £0.22 per minute.
- The time taken for two people to apply a single tag is 1 minute each. It is estimated that the labour cost of single tagging is in the region of £0.44 per animal.
- The time taken for two people to apply a temporary mark is 15 seconds each, i.e. £0.11 per animal.
- Replacement tags – the average time taken for two men to collect an individual animal and apply a replacement tag is 1 minute each for a single tagged animal. The total labour cost of tagging is estimated to cost in the region of £0.44.
- In summary, the cost of applying (tag plus labour) a short-life tag is £0.64 and £0.84 for a long-life, movement or replacement tag
- There are no additional gathering costs as tagging would be combined with a management practice (i.e. worming, castration etc). For movements on and off holdings the animals would need to be gathered in any case. These gatherings cannot be considered as an additional burden. All tagging is carried out in reasonable weather conditions.

A1.5. An additional cost incurred under Option 3 is for Movement tags applied for sheep going direct to an abattoir from a location which is not their baseline holding. There are approximately 3.9 million Scottish sheep slaughtered annually. Industry estimates are that **15-20%** (585,000- 780,000) move direct to an abattoir. Under this proposed change it is difficult to identify approximately how many of these would now require a Movement tag if they are moving from a farm which is not their holding of birth direct to a slaughterhouse. Taking a figure of **10%** of the total killed annually then an additional **390,000** Movement tags need to be applied annually for sheep moving direct to slaughter from a location that is not their holding of birth.

A.1.6. It is therefore estimated that an additional **390,000** movement tags will be required under option 3, compared to the current system. It is assumed that these would be made using cheaper tags that can be purchased from tag suppliers. The average cost of purchasing and applying a short-life tag is £0.64 (a long-life tag would cost £0.84). Therefore the total cost of applying the additional Movement tags under Option 3 is approximately **£249,600** (390,000 x £0.64). (Rounded up to **£250,000** in future references.) It is worth noting the cost of applying Movement tags would fall disproportionately on finishers as opposed to breeders.

A1.7. The Regulation also requires lost tags to be replaced. There are no figures available on loss rates of sheep tags but industry claim that loss rates could be in the order of 5% per year per tag. However the replacing of tags is already required under the Scottish system so there is no additional cost to keepers.

**Option 3 - SUMMARY OF ANNUAL COSTS FOR SHEEP INDUSTRY IN SCOTLAND 2005-2007**

**Annex 2**

1.3 i.e. securing the National Derogation

Measure	Total Cost of Option 3	Total Cost of Existing Single Tagging System	Increased Cost (i.e. additional to existing system)	Government	Enforcement and Inspection costs
<b>Identification:</b>					
Cost of identifying slaughter lambs	£1.92M	£1.92 M	£ nil	Ear Tag Allocation System (ETAS) £ 276K set up costs plus risk of disallowance. Plus annual running costs of £ 192K  Eartag approval system. Set up costs of £ 9,600 plus annual running costs of £ 6,240	
Cost of identifying breeding sheep	£ 856.8K	£ 856.8K	£ nil		
Cost of replacement tags	£ 119K	£ 119K	£ nil		
Cost of Movement tags	£ 1.8M	£ 1.54M	£ 250K		
Cost of applying temporary marks	- £ 44.2K	£ 44.2K	- £ 44.2K		
<b>TOTAL IDENTIFICATION COSTS</b>	<b>£4.652M</b>	<b>£ 4.48M</b>	<b>£ 206K</b>	£ 286K Set up costs  £ 198.2K running costs	
<b>On farm records:</b>	Not calculated	Not calculated	£ nil	Risk of disallowance	Increase in inspection anticipated – unquantifiable at present
<b>Movement documents:</b>	Not calculated	Not calculated	£ nil	Risk of disallowance	
<b>Central Register and database:</b>					
Cost of enhancing computer database	£ nil	£ nil	£ nil	£ 14.4K set up costs £ 40.3K annual running costs Risk of disallowance	
<b>TOTAL COSTS</b>	<b>£ 4.65 M</b>	<b>£ 4.48 M</b>	<b>£ 206 K</b>	£ 300 K set up costs £ 238.5 K annual running costs. Risk of disallowance	Unquantifiable at present

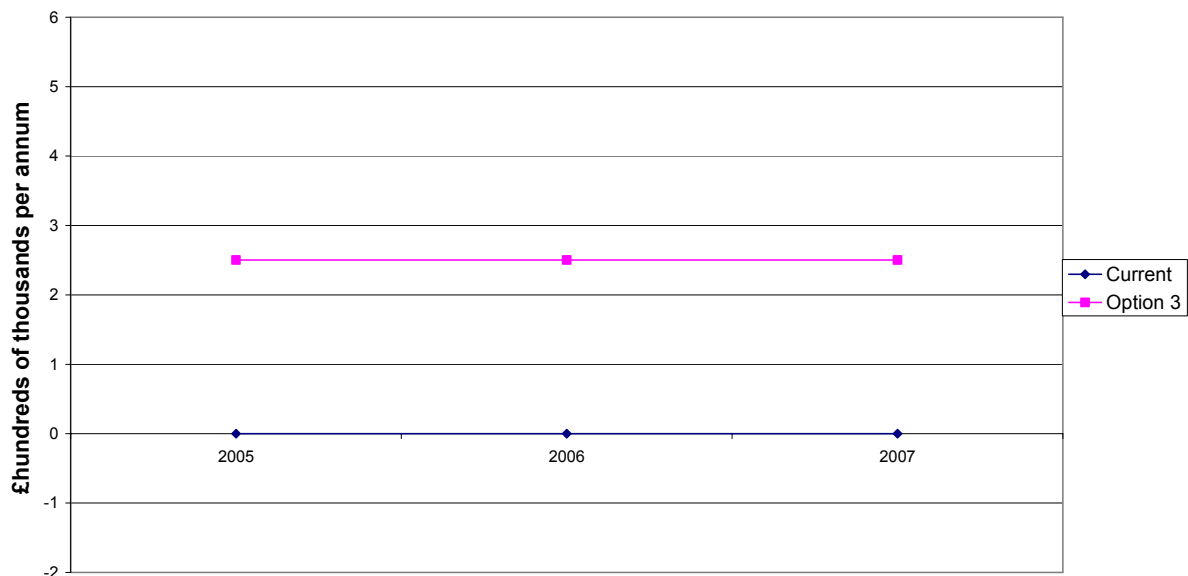
**Comparison of Options - Current Costs and Present Values, 2005 - 2007**

Tables to show Breakdowns by Year of Option 3

		Year			Total Increased Costs (2005-07)
		From July 2005	All 2006	All 2007	
Increase in ID Costs	Current Cost	£120,000	£250,000	£250,000	£620,000
	*Present Value	£120,000	£241,750	£233,500	£595,250
<b>Total Increase in Current Cost</b>		£120,000	£250,000	£250,000	£620,000
Total Increase in *Present Value		£120,000	£241,750	£233,500	£595,250

\*Present value is calculated using a reduction of 3.3% per annum on the Current Cost. This is a standard Government figure used in all these types of calculations.

**The difference in annual cost to the Industry between Option 3 compared to current costs**



**OPTION AND COST SUMMARY – SHEEP**

**Annex 5**

Option	INDUSTRY COSTS	Assessment
1 - Do Nothing	£nil.	Not recommended. Risk to exports for not implementing the Regulation and likely infraction proceedings. High risk of disallowance.
3 – Secure derogation from double tagging until January 2008, when EID is scheduled to be introduced.	<b>£250,000</b> p.a. increase in 2005 when the national derogation starts to apply. Total increased cost over the period 2005 – 2007 = <b>£620,000</b> (£595,250 present value).	<b>Recommended Option.</b> Although costs to industry are higher, it provides better traceability between holdings. <u>It is also industry's preferred option</u> because of retagging issues.

## Small Business Litmus Test.

A small business litmus test was sent out to a number of businesses to gauge the potential level of impact on the sheep and goat keeping industry as a whole. The test comprised of 11 questions designed to cover all eventualities. The number of recipients was 25, with 7 completed returns.

A summary of the overall results is displayed below:

**Q.1.** From the guidance that has been provided so far, have you been able to understand what effect the proposals will have on your business?

**Summary:** Increased costs, relating to tags, readers and boluses was tied in with an increase in time, required to carry out the new requirements, leaving less time to carry out other farming duties.

**Q.2.** What is your view of the overall concept of the Commission's proposed regulation?

**Summary:** Support the need for traceability and disease control; however Commission needs to be made aware that British sheep flocks are far larger and farmed extensively. Although the idea behind is well intentioned, it will be costly.

**Q.3.** How does the proposed approach differ from what you already do?

**Summary:** The requirement to record all individual movements, e.g. to summer grazing, winter tack etc. As well as, It will create a great deal of bureaucracy for no real gain, as the current system could be made to achieve much better meeting of all the aims required.

**Q.4.** If adopted, will it change how your business operates generally, and how it relates to other businesses and consumers?

**Summary:** More administration costs, the people who have had this new idea, have not taken account of the time to operate this- tagging-retagging-paperwork; this will all add pounds to costs.

**Q.5.** Do you consider the proposals to be a challenge or a threat to your business/ the industry as a whole? Explore what challenges/threats are and reasons for this.

**Summary:** The challenge is for small farmers, with limited capital and time becoming computer literate, to cope with all the recording requirements. As well as it will put people off keeping sheep.

**Q.6.** Who will be in a better position to exploit challenges and respond to threats – small businesses or larger organisations?

**Summary:** Larger farms have computers and paid staff. Smaller farms rely on family and part time labour, and are not as well equipped.

**Q.7.** Is the sector you work likely to expand or contract as a result of introducing the proposals – will there be new entrants or mergers?

**Summary:** Some older farmers may use this as a reason to retire or scale down. Younger men and women can retrain, to deal with computerised record keeping.

**Q.8.** What affect do you think it will have on income/profit both within the industry and your firm? What are the implications of this for your business, the industry and the consumer?

**Summary:** The cost of tags is too high. Farm incomes are at an all time low. It is not possible to simply pass on the cost to the consumer. This will merely suit cheap imports. As well as a great deal of cost at no extra benefit to industry or consumer. Income down, for industry and my farm. If it comes in, I will go out of business.

**Q.9.** How do you think your business will operate in five years time? (i.e. After the proposed measures have been operational for some time).

**Summary:** Will be more use of specialist contract labour, i.e. tagging. Movements dealt with via email less use of paper forms. Hopefully some form of electronic ID will be working acceptably, but no real benefits will have come from this

**Q.10.** Are there any other matters you wish to raise in connection with these proposals?

**Summary:** Animal welfare. The ears of newborn lambs/kids are small. As well as, nobody in the industry is in favour of these proposals.

**Q.11** If you farm, can you tell us the:

Number of goats:

Number of sheep:

Type of Holding

**Summary:** The spread of farm sizes where results where given were:

99 Ewes, No Goats. Upland farm.

1100 Goats, Lowland farm.

1300 sheep, Upland (mixed) holding.

1200 breeding ewes, Upland (mixed) holding.

150 ewes, Lowland (mixed) holding

*Livestock ID & Traceability Branch*

*SEERAD*

*11 August 2005*

**Annex C****Location Flock / Herd Register**

Address of Holding	
Post Code	
CPH Number	<b>69 / 066 / 0220</b>
Flock/Herd Number of this CPH	<b>UK 541541</b>
Name of Registered Keeper	
Species (Sheep or Goats)	
Type of Production (Milk or Meat or Both)	
Address of Keeper (if different from above)	
Post Code	

Notes of Guidance on how to use the Flock/herd register correctly and on the correct use of tags will be included in the printed version of the register which will be issued to keepers in early October. Draft Notes are on the following 2 pages and we welcome your comments.

**Draft**

## **Notes for guidance**

### **Using the Flock/herd register correctly**

1. This flock/herd record book is designed to meet the record keeping requirements for sheep and goats as laid down in Council Regulation (EC) No. 21/2004. This legislation was introduced to provide a European Union system for identifying and tracing the movement of sheep and goats. The record book is designed to ensure keepers record the information that the above Regulation requires and where possible, space has been created for management/subsidy information to be entered. *These details should go in the columns headed in italics.*
2. You must record all movements of sheep/goats to and from the CPH within 36 hours of the movement taking place. Your flock/herd register must be made available to inspecting and enforcement officers. You are also recommended to start a new page on 1 January each year and you must retain these records for 6 years.
3. Use a new line each time an event occurs e.g. move on and off on the same day – this includes animals sent to market and brought home unsold and also moves to shows, dipping, shearing and AI centres. Lambs sold with their mother must also be counted.
4. Once a year, you must record for this flock and herd, the total number of sheep and the total number of goats that were present on this holding on *a date yet to be fixed – see consultation paper at section 5.3.6.*
5. There is a requirement to record an animal's individual number in the flock/herd record book in specific circumstances, such as movements to shows or for breeding exemptions, or for export, or where the 3 tag limit (**see below**) will be exceeded.
6. A flock/herd record must not cover animals located at more than one CPH.
7. All the flock and herd records you have for one holding constitute the holding record

### **Identification Tags**

8. From 1 January 2006 all tags must be of an approved type. Your tag supplier is aware of this and can explain what is required.
9. Tattoos can only be used as an official identifier on animals born on or before 9 July 2005.

10. All lambs and kids must be uniquely identified before nine months of age (or six months if intensively reared) or before leaving the holding of birth, whichever is sooner. We recommend you identify your animals when you gather them in for routine procedures, whilst taking into account possible welfare issues. **Remember, before sheep and goats leave their holding of birth for any reason they must be uniquely identified.** Lambs or kids born on rented grazing must be identified with a unique UK number featuring the flock/herd mark for that holding – **see 10** below. You may wish to contact your local Animal Health Divisional Office to establish the correct flock/herd for this land. This ensures your animals are correctly and uniquely identified.
11. **UK Baseline tags** – For all unidentified animals still on their holding of birth, the eartag must bear the letters UK, followed by the flock/herd mark of the holding of birth and a unique 6 digit individual number e.g. UK 541541 000345. Any colour except Red. Animals born after 9 July 2005 and going for export must be double identified.
12. **S Baseline tags** – For all unidentified animals NOT on their holding of birth and not already baseline identified, the eartag must bear the letter S, followed by the flock/herd mark of the current location followed by a unique 6 digit individual number e.g. S 541541 000345. Any colour except Red.
13. **Replacement baseline tags** – If a sheep or goat loses a baseline eartag, and the animal is not on its holding of birth, you can either replace it with an identity tag (if you know the animal's official identity) or with a red Replacement tag. The R tag should consist of the letters UK, followed by the flock/herd of the animal's current location mark followed by a unique 6 digit individual number followed by the letter R e.g. UK 541541 000124R. This tag type must be red in colour
14. **Movement tags** – For animals leaving any holding other than the location where the baseline mark was applied, a movement S tag should be applied consisting of the letter S followed by the flock or herd mark of the current holding the animal is moving from e.g. S540540. No individual number should be added to this type of tag. If the keeper chose not to apply a movement tag or the animal already carries the maximum of 3 official tags, then they must record the animal's full baseline number in the flock/herd records and on the movement document. The type of tag allows traceability back to a sheep or goat's previous holding.
15. **F tags** – Sheep and goats imported from outside the European Union must be identified with an F mark on the holding of destination within 14 days of arrival in the UK. This tag consists of the letters UK followed by the flock/herd mark, and a unique 6 digit individual number and the letter F. A sheep or goat arriving from another member state (MS) retains its MS identity.

**If you have any queries on which correct type of tag to use, please contact SAMU staff at either [livestock.ID@scotland.gsi.gov.uk](mailto:livestock.ID@scotland.gsi.gov.uk) or on 0131 244 4202.**



**Bold = Compulsory**     *Italics = Optional*

<b>A</b>	<b>B</b>	<b>C</b>	<i>D</i>	<b>E</b>	<b>F</b>	<b>G</b>	<b>H</b>	<i>I</i>
<b>Date of Event</b>	<b>Type of Event</b> <b>Move off (col E)</b> <b>Move on (col G)</b> <i>Other events e.g. Births, deaths, missing</i>	<b>Number of sheep or goats involved</b>	<i>Category of animals e.g. ewes, gimmers, lambs</i>	<b><u>Moves OFF.</u></b> <b>CPH or address of next location.</b> <b>Complete col F also</b>	<b>Name of Haulier and vehicle registration number</b>  <i>**Permit number</i>	<b><u>Moves ON.</u></b>  <b>CPH of location that animals arrived from</b>	<b>Lot number/s of animals if direct from a market or animal's individual number for show moves or to avoid applying a Movement tag</b>	<i>Running total of sheep or goats on this CPH location</i>
2005								
1 Jan	<b>Enter number of animals present on 1 January in Col I and notify the total to SEERAD as annual inventory</b>							

1. If the animals are travelling to or from a show, their unique individual number should be listed on the Movement Document and listed in **column H** above.
2. This also applies if the keeper chooses not to apply a Movement tag or if the animal already carries 3 official tags and the movement being undertaken would normally require a Movement tag to be applied. This is the 'Read & Record' option.

*\*\* Permit number: this information will not be required until forthcoming EU legislation on Animal Welfare is introduced – probably in 2006*



SCOTTISH EXECUTIVE

Quote Legislation here. Anything else ?

**1. DEPARTURE LOCATION - KEEPER ACTION**

DEPARTURE CPH  DEPARTURE DATE

DEPARTURE FLOCK NUMBER

DEPARTURE ADDRESS \_\_\_\_\_

Number of Animals	Sheep or Goats	???	Individual number (required for certain movements)

HOME ADDRESS OF KEEPER \_\_\_\_\_

DESTINATION CPH

DESTINATION ADDRESS \_\_\_\_\_

I declare that the above details are correct. Phone Number \_\_\_\_\_  
 Signature \_\_\_\_\_ Print Name \_\_\_\_\_

**2. RECEIVING LOCATION - KEEPER ACTION**

DATE OF ARRIVAL \_\_\_\_\_ NUMBER RECEIVED \_\_\_\_\_

I declare that the above details are correct. Phone Number \_\_\_\_\_

Keeper's Signature \_\_\_\_\_ Print Name \_\_\_\_\_

**3. HAULAGE DETAILS**

NAME OF DRIVER \_\_\_\_\_ VEHICLE REGISTRATION \_\_\_\_\_  
 HAULAGE COMPANY \_\_\_\_\_ PERMIT NUMBER \_\_\_\_\_

Pink – Departure location records  
 Movement documents to be retained for 6 years.      White – Haulier and then to receiving location records  
**DON'T FORGET - ENTER IN THE FLOCK/HERD BOOK**

*Notes:*

1. This modified example shows the A5 size currently in use and contains all the details that must be provided under EC Regulation 21/2004.
2. If industry wishes, the new version can be increased to A4 size and more space allocated to specific areas. Are there any non-official details that you want included on an A4 version?
3. All details above the grey line at 2. should be completed by the keeper at the departure location before the animals move. Either the destination CPH or address must be stated.
4. Haulage details @ 3. must be completed before the journey commences – the driver has ultimate responsibility for ensuring this section is completed.
5. Keeper at destination location must check details in Section 1 are correct and add any missing details e.g. CPH. Then complete the required details at 2. Send to SAMU within 3 days
6. Currently 2 copies of each MD are provided. Would it be beneficial to have a third copy – either for sending to SAMU or for the haulier's records?
7. We intend printing guidance on how to complete and use the MDs on the inside cover of the folder that holds the pre-printed MDs that SEERAD will provide. Contact details for SAMU will also be provided.

## Annex E

### Responding to this consultation paper

We are inviting written responses to this consultation paper by **8 September 2005**. Please send your response to:

[livestock.ID@scotland.gsi.gov.uk](mailto:livestock.ID@scotland.gsi.gov.uk)

Or

21/2004 Consultation  
Room 215, SEERAD  
Pentland House  
Robbs Loan  
Edinburgh  
EH14 1TY

If you have any queries on replying, please contact Alistair Henry on 0131 244 6404.

Please complete the attached response form on the following page with any comments you wish to make.

This consultation, and all other SE consultation exercises, can be viewed online at <http://www.scotland.gov.uk/consultations>. You can telephone Freephone 0800 77 1234 to find out where your nearest public internet access point is.

The Scottish Executive now has an email alert system for [SE consultations \(SEconsult\)](#). This system allows stakeholder individuals and organisations to register and receive a weekly email containing details of all new [SE consultations](#) (including web links). [SEconsult](#) complements, but in no way replaces SE distribution lists, and is designed to allow stakeholders to keep up to date with all [SE consultations](#) activity, and therefore be alerted at the earliest opportunity to those of most interest. We would encourage you to register.

### Access to consultation responses

We will make all responses available to the public in the Scottish Executive Library by 10 October unless confidentiality is requested. All responses not marked confidential will be checked for any potentially defamatory material before being logged in the library or placed on the website.

## Respondee Information Form - Sheep and Goat ID Consultation

Please complete the details below and attach it with your response to the consultation. This will help ensure we handle your response appropriately:

Name:

Postal Address:

Organisation:

1. Are you responding as: (please tick one box)

- (a) an individual  (go to 2a/b)  
(b) on behalf of a group or organisation  (go to 2c)

### 2a. INDIVIDUALS:

Do you agree to your response being made available to the public (in SE library and/or on SE website)?

- Yes (go to 2b below)   
No, not at all

**2b. Where *confidentiality is not requested*, your response will be available to the public on the following basis (please tick one of the following boxes)**

- Yes, make my response, name and address all available   
Yes, make my response available, but not my name or address   
Yes, make my response and name available, but not my address

### 2c ON BEHALF OF GROUPS OR ORGANISATIONS:

Your name and address as respondees **will be** made available to the public (in the SE library and/or on SE website). Are you content for your response to be made available also?

- Yes   
No

## SHARING RESPONSES/FUTURE ENGAGEMENT

We will share your response internally with other SE policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future in relation to this consultation response?

- Yes   
No

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