5. Cattle-tracking

Introduction

5.1 An important feature of animal husbandry is the ability to identify and trace the history and location of an animal. This has commonly been achieved by ear-tagging or tattooing, and by the use of records detailing the animal’s movements, parentage and offspring. Historically, owners identified their animals for day-to-day farm management purposes. More recently, national policies on disease control have led to the imposition on farmers of a succession of record-keeping and animal identification requirements. The first fully national identification scheme in the UK was introduced for cattle in 1953, as part of efforts to eradicate bovine tuberculosis. All cattle that were not already registered with a breed society had to be identified with an ear tag or tattoo. The system underwent some modifications, but formed the basis of the identification and registration scheme that operated in the UK when BSE emerged.2015

5.2 This chapter examines how the BSE epidemic led MAFF officials and industry participants to reassess the adequacy of existing cattle-tracking systems in the UK. The fear that BSE might be maternally transmitted raised the question of whether the offspring of BSE-affected animals could be identified and located if necessary. MAFF responded by imposing more stringent identification and record-keeping requirements on farmers.

5.3 The accessibility of cattle movement and breeding records is an important component of any cattle-tracking system. When BSE emerged, tracing of individual animals depended on a physical ‘paper-chase’ to ascertain the origin of an animal. Following a recommendation of the House of Commons Agriculture Select Committee in 1990, pressure was placed on MAFF to establish a central, computerised database to allow fast and accurate tracing of every bovine animal in the UK. We discuss in detail how MAFF officials responded to that recommendation.

The adequacy of existing regulations

Existing legislation

Legislation in force at the time BSE emerged

5.4 Prior to the emergence of BSE, the legislation governing the identification and movement of bovines was the Movement of Animals (Records) Order 1960,2016 made under the Diseases of Animals Act 1950, and the Tuberculosis (England and Wales) Order 1984,2017 made under the Animal Health Act 1981.
5.5 Article 3(1) of the Movement of Animals (Records) Order 1960 provided that ‘any person who moves, or permits to be moved, an animal to or from any premises shall enter in a record in the form set out in the Schedule to this Order such particulars relating to the movement of the animal as are specified in the headings of the several columns in that Schedule’. The schedule required that the records show the breed, age, sex, ear tag number, date of movement and addresses of premises between which the animal moved. Article 4 of the Order provided that:

(1) every entry in a record shall be made in ink or indelible pencil within thirty-six hours after the movement of the animal required by this Order to be entered in the record; and

(2) every entry in a record, required by this Order to be made by any person, shall be retained by him for a period of three years, in the case of a bovine animal . . . from the making of the entry and shall be produced by him for inspection at all reasonable times on demand to any inspector of the MAFF or of a local authority . . .

5.6 Article 16 of the Tuberculosis (England and Wales) Order 1984 provided:

(1) Subject to paragraph (2) below, the owner of a bovine animal kept on any premises shall mark or identify the animal in a manner approved by the appropriate Minister and shall thereafter maintain such a mark or identification so as to be clearly legible, and

(2) The requirement in paragraph (1) above shall not apply in relation to any bovine animal less than 14 days old that is not removed, or is removed only to a slaughterhouse from such premises, within such period of 14 days.

Legislation introduced after the discovery of BSE

5.7 Article 6(1) of the Bovine Spongiform Encephalopathy (No. 2) Order 1988 gave veterinary inspectors power, where BSE was suspected, to ‘take such steps as may be necessary to establish the correctness’ of that suspicion. For the purposes of such an enquiry, under article 6(2)(c), a veterinary inspector could ‘mark for identification purposes any bovine animal or carcase on the premises’.2018

5.8 This power was wide enough to allow MAFF to mark the offspring of suspect BSE cases so that they could be identified. However, when the provision was introduced, MAFF gave an undertaking to the industry that these powers would not be used in the absence of proof of maternal transmission.2019

Problems with existing requirements in relation to BSE

5.9 The first concern over the adequacy of the existing Regulations in the context of BSE was expressed on 17 August 1989 by Mr Alistair Cruickshank, Head of the Animal Health Group (AHG), in a minute to Mr Robert Lowson, Head of Animal Health Division (AHD). He said:
We do need to be quite sure that we can effectively identify the offspring in question, so that if maternal transmission is established we shall be able to take effective action at that time. Would it be possible to produce an assessment of the reliability of the movement records so that we can form a view on the need for any further action to tighten up our arrangements?  

5.10 Mr David Curry, MAFF Parliamentary Secretary, reiterated this concern to Mr John Gummer, the Minister of Agriculture, on 6 September 1989. He noted that if BSE could be transmitted from animal to animal, which was the worst case scenario, ‘we will be hampered by the absence of comprehensive records of animal breeding and movement’. Accordingly, Mr Curry had ‘asked officials for a note on how we could tighten and extend those records which are held without legislation’.  

5.11 On 19 October 1989 Mr Lowson provided the note requested by Mr Curry. He explained that there was, as yet, no evidence of maternal transmission, and that studies to resolve the issue would not yield results for some years. Further, he said it was ‘not yet known whether horizontal transmission of BSE can occur in the field and the evidence from other transmissible encephalopathies is contradictory’. Mr Lowson then discussed various implications that transmissibility had for the control of BSE:

The main problem in pursuing a slaughter policy in the event of maternal transmission would be in tracing the offspring of cows that develop BSE. As part of our epidemiological studies we record the known offspring of all cases of BSE but cannot identify those born while the cows were in previous ownership. Currently we are aware of some 3,500 offspring of BSE cases.

The BSE (No 2) Order 1988 has provision for the SVS [State Veterinary Service] to restrict the movement of any animal and to mark offspring of suspect BSE cases so they can be identified. An undertaking not to use these powers in the absence of evidence of maternal transmission was given to the industry when they were introduced. The identification of offspring would therefore depend on the epidemiological records collected by veterinary officers and kept by the Central Veterinary Laboratory and on breeding and movement records kept by farmers.

Farmers are required to keep movement records showing breed, age, sex and ear tag number of animals moved under the Movement of Animals (Records) Order 1960 (except for those going for slaughter). These are generally sufficient to enable the movement of a specific animal to be traced, but they have to be retained for only 3 years. Because BSE has a long incubation period we might need to trace back further than this. Some records that might be needed in future have no doubt already been destroyed. But it would nevertheless be prudent to amend the Order to require retention for a longer period, and this is recommended; as one case has been identified of a 9-year old cow showing the disease, a 10-year period would be reasonable.

There is also the question of identifying the offspring themselves. There is no legal requirement for farmers to keep breeding records and only a
minority of non-pedigree herds do so. Without such a legal obligation we
could not guarantee to identify all offspring. At first sight this is unlikely to
present a major problem as it appears that a very high proportion of offspring
remain for a considerable time on their farm of birth. Officials will however
examine further whether it would be appropriate to require farmers to
maintain records of progeny.\textsuperscript{2022}

\textbf{5.12} In conclusion, Mr Lowson invited Mr Curry ‘to agree to a change in the
Movement of Animals (Records) Order 1960 to require farmers to retain
appropriate records for 10 years rather than 3’.\textsuperscript{2023} Mr Lowson was informed of
Mr Curry’s agreement to this on 6 November 1989.\textsuperscript{2024}

\textbf{5.13} Pursuant to Mr Gummer’s request during a meeting on 6 February 1990,\textsuperscript{2025}
Mr Lowson provided a note on 22 February 1990 about ‘the action that could be
taken in advance of conclusive evidence about the transmissibility of BSE’. A paper
prepared by the State Veterinary Service (SVS) was annexed, which canvassed
alternative courses of action. This included slaughtering the progeny of affected
animals and restricting breeding from the progeny of affected animals. The paper
discussed the implications for cattle identification:

\begin{quote}
Many of the measures which will be considered depend on the accurate
identification of the offspring of affected animals. Such records are readily
available in pedigree herds, but in commercial herds the identification of calf
to dam is dependant on the farmer’s interest and management practices.
There is no statutory requirement to make or keep such records: only to
identify cattle in the ear within 14 days of birth (and sooner if moved off the
farm) and record the details of animals sold. A requirement to keep details
of the identity of the offspring of every cow, and to retain those details for at
least 10 years, would provide accurate information on which any future
action which proved necessary could be based. \textit{This action is recommended},
irrespective of any other measures adopted.\textsuperscript{2026}
\end{quote}

\textbf{5.14} In his note on cattle identification, Mr Lowson said:

\begin{quote}
Existing requirements relating to farmers’ keeping of records are inadequate
in the context of BSE . . . and whatever action is taken in response to possible
maternal transmission it is recommended that the necessary changes should
be pursued. Ministers have already agreed that the period during which
farmers are required to retain movement records should be extended, but it
has not yet been possible to pursue this because legal advice is that ideally
this amendment should not be made without a comprehensive revision of the
legislation for which time has not been available. The SVS paper
recommends that we should go somewhat further and require records to be
kept in respect of animals which do not leave the farm. Work to update the
legal requirements should now be given top priority.\textsuperscript{2027}
\end{quote}
5.15 On 14 March 1990, Mr Keith Meldrum, the Chief Veterinary Officer (CVO), Mr Cruickshank, Mr Charles Capstick, Mrs Elizabeth Attridge, Mr Lowson and others met the Parliamentary Secretaries – Mr David Maclean and Mr Curry – to discuss the proposed improvements to identification of calves. Mr Curry noted that the improvements were ‘strongly recommended’ by the SVS paper. Mrs Attridge was concerned about farmers’ poor reputation for keeping records, while Mr Cruickshank said there was a need to consider whether the resources were available to do the job effectively and whether the cost would be proportionate to the benefits. Mr Meldrum explained that the proposed requirement to keep records on the identity of calves would apply to all offspring of all cows and would supplement existing movement records. Therefore, he said, it would not be a major step to require a proper breeding identification system. The meeting endorsed the need for an improved identification system for calves, in principle, but recognised that there was a need to explore further the question of resources and practical implications to ensure effective results were achieved. Mr Curry requested that a paper be prepared to explore these aspects.

5.16 In response to Mr Curry’s request, on 5 April 1990 Mr Lowson sent Mr Maclean a further note on the proposed changes to movement and breeding record requirements. On the current arrangements, Mr Lowson wrote:

In the light of the possibility that BSE may be found to be transmissible from cow to calf, these requirements fall short of the arrangements which might be needed to deal with the disease, because

(i) there is no legal requirement for farmers to maintain breeding records, ie, those which would enable an individual calf to be related to its dam; and

(ii) because of the long incubation period of BSE, the requirement to maintain movement records for 3 years is insufficient.

5.17 Mr Lowson proposed:

i. to require farmers to maintain records that showed the breed, sex and ear number of each calf, its date of birth, and the identity of its dam; and

ii. to require that such records, and movement records already required to be kept under the 1960 Order, be retained for ten years.

5.18 He explained that the changes could be implemented by introduction of a new Order for the breeding record requirements, and an amendment to the Movement of Animals (Records) Order 1960. Mr Lowson noted that:

By making these changes we would be laying down a framework which in theory should enable us to identify and trace all calves born to BSE cases. In practice the extent to which this objective is achieved will depend on the industry’s marking animals and keeping records properly . . . Nevertheless,
short of applying a separate mark to BSE offspring, which would involve considerable extra manpower and would still not be foolproof (eg, if a cow goes down after producing several calves) the proposed changes appear to be the most practical solution. They would certainly facilitate the tracing of a much higher proportion of offspring than is at present possible.\textsuperscript{2033}

5.19 Mr Lowson was advised 12 days later that Mr Maclean agreed with the proposals.\textsuperscript{2034}

**SEAC supports the proposals**

5.20 MAFF’s proposals to impose more stringent requirements to secure more comprehensive cattle records were endorsed by the Spongiform Encephalopathy Advisory Committee (SEAC) on 17 May 1990 in their advice to Ministers on breeding from offspring of BSE-affected cows.\textsuperscript{2035}

5.21 SEAC’s report on BSE controls was published on 12 July 1990. SEAC noted that any future disease control strategy involving the removal of particular animals might be based on removing potentially infected breeding lines rather than individual animals. It said that such a measure would be greatly facilitated ‘if present arrangements for maintaining breeding and movement records were improved, and we welcome the Government’s intention to do so’.\textsuperscript{2036}

5.22 Before the Government introduced legislation to implement these proposals, the Agriculture Select Committee initiated an inquiry into BSE on 16 May 1990. Its stated intention was ‘to gather the relevant evidence and present the House with an early assessment of the available facts’ about BSE.\textsuperscript{2037} In the event, the Select Committee’s consideration of cattle-tracking during its inquiry, and subsequent recommendation on the establishment of a computerised tracing system, required MAFF to consider issues that went beyond its initial proposal to improve the records required to be kept by farmers.

**Computerisation**

**The tracing systems in place in 1990**

5.23 Before turning to the Agriculture Select Committee’s recommendation, it is helpful to briefly set out MAFF’s tracing systems in place in 1990. MAFF’s main sources of information on the location of farm animals were its annual census data, and the ‘VetNet’ database. The VetNet database comprised data submitted by veterinarians in the field following regular tuberculin and brucellosis testing, and other disease control activities. However, as Mr John Wilesmith, Head of the Epidemiology Department at MAFF’s Central Veterinary Laboratory (CVL), explained:
What neither of those databases contains are the identities of those animals. One knows what the herd mark is because that is an identifier of the herd as well as the county parish holding them. You do not have a list as it were of all the animals on that farm . . .

If you have an animal in front of you that you want to get its history, then you have to do a physical tracing.\footnote{2038}

5.24 In the event of a disease outbreak, the farmer’s identification and movement records provided much of the basic data required to determine the origin of the disease and possible sources of infection.\footnote{2039} To uncover the history of a particular animal, physical tracing involved examining the market records and farm movement records to discover its origin.

The BSE database

5.25 MAFF kept details of all BSE cases on a database at the CVL. The database was developed during 1987 to record and analyse data collected via a detailed questionnaire devised by Mr Wilesmith and his colleagues. Mr Wilesmith described its development in his evidence to the Inquiry:

By 11 August, 1987, I was satisfied that we had established the required set of data for each case and affected herd, together with the likely on-farm sources. On 14 August, 1987 responsibility for routine data collection (using the questionnaire we had compiled) was devolved to colleagues in the VI Centres. My department commenced development of a computer based epidemiological database on BSE during August 1987, to record and analyse the data collected in response to the questionnaires.\footnote{2040}

5.26 During oral evidence, Mr Meldrum explained that when the SVS investigated a suspect case of BSE, the visiting Veterinary Officer (VO) would fill out the questionnaire, the details of which were then put on to the computer.\footnote{2041}

Use of IT in the AHG and SVS

5.27 The 1988 MAFF Information Technology (IT) Strategy Plan identified the AHG as a ‘priority area requiring early attention’ for a study of information systems requirements. Officials from MAFF’s Information Technology Directorate (ITD) carried out a scoping study for the AHG and SVS during January and February 1990, with its report issued in February. The scoping study’s purpose was ‘to ascertain the time and resources required by the . . . ITD to carry out a full study of the Animal Health Group/State Veterinary Service’. The scoping study recommended that a staged study should be undertaken to address the organisational and management IT needs of the AHG and SVS.\footnote{2042}

5.28 A Sub-Strategy Study was carried out in five stages between March and November 1990. In August 1990 the AHG and parts of the SVS were merged and
renamed the Animal Health and Veterinary Group (AHVG). The study’s overall objective was:

[I]n close cooperation with the client, to analyse the business functions of the AHVG, define information systems necessary for the efficient carrying out of the business, assess how . . . IT could best contribute to the operations of the group and devise a strategic plan for implementing the required IT opportunities.\textsuperscript{2043}

5.29 The five stages of the Sub-Strategy Study were:

i. information gathering;

ii. corporate modelling and analysis;

iii. identification and description of candidate systems (IT opportunities);

iv. evaluation of candidate systems and development of alternative options for their implementation; and

v. production of an implementation plan for the preferred option.\textsuperscript{2044}

5.30 The Project Board responsible for overseeing the study comprised:

- Mrs Elizabeth Attridge, Chair;

- Mr G Davies, Senior User, Technical;

- Mr Richard Gregg, AHD, Branch C (Imports and Exports), Senior User, Administration;

- Mr Raymond Long, Senior Technical, Infocentre; and

- Mr K Robey, Senior Technical, Development.\textsuperscript{2045}

5.31 The ‘Main Report’ on the IT Sub-Strategy Study for the AHVG was produced by the ITD in November 1990. In July 1990 the Agriculture Select Committee had its recommendation on cattle-tracking and computerisation. We now turn to discuss this recommendation, before turning to the recommendations in the IT Sub-Strategy Study report, which themselves acknowledged the Select Committee recommendation.

The Agriculture Select Committee’s recommendation for a new computerised database

Evidence received by the Committee

5.32 In its memorandum to the Agriculture Select Committee, the National Farmers’ Union (NFU) said:
We have... asked that the keeping of breeding records be required, and this is now a matter of MAFF consultation. We believe this is essential if the cattle industry is to be able to trace blood lines in the event of an inheritance factor being proven.\textsuperscript{2046}

5.33 In its memorandum, the Meat and Livestock Commission (MLC) viewed ‘the need to improve the identification of all calves as a clear and necessary prerequisite to better control of this disease’.\textsuperscript{2047}

5.34 The NFU and MLC gave oral evidence to the Select Committee on 20 June 1990. Although the NFU agreed with MAFF that change was necessary, the President of the NFU, Sir Simon Gourlay, told the Select Committee that changes going beyond those proposed by MAFF were needed:

We are not so much disagreeing [with MAFF’s proposals], we are going beyond what [MAFF] are currently suggesting, because they suggest that farmers should have to keep the records for ten years. If you are going to trace the breeding records, the dams, of any animal it is to my mind a totally impracticable thought to think that in three years’ time you can get individual farmers shuffling through their records to identify this animal. If it is on central computer, that animal every time it is moved, we believe, with a pretty short time delay, can be put onto computer, and therefore that animal’s dam can be traced by the computer.\textsuperscript{2048}

5.35 The Meat and Livestock Commission (MLC) also expressed full support for the measures proposed by the Government. Mr Colin Maclean, Technical Director of the MLC, told the Select Committee:

There is a computer system established for the progeny of [BSE] affected cows now, it is running, and the Government will know where they all are. The development of a wider system, of which there is an initial model in the Northern Ireland Agriculture Department which actually does monitor, from a health point of view, what is going on in that country, could be deployed, modified, in this country, although that would take some significant time. It is too cumbersome at the moment. So some of the mechanisms are there, if the money is actually there to deploy them.

... The progeny of all cows that have been affected with BSE are currently recorded by the Central Veterinary Laboratory at Weybridge. The unique ear tag and its herd number is being logged. That animal will therefore be traceable.\textsuperscript{2049}

5.36 Sir Simon responded that although ‘Mr Maclean is absolutely right that currently all animals that have been affected and their progeny are recorded, it is difficult to trace back on those animals that are yet to be confirmed cases, to trace their progeny historically’.\textsuperscript{2050}
5.37 Mr Meldrum also appeared before the Select Committee, and was asked to comment on Sir Simon’s suggestion that it was not always possible to find offspring of infected cows. Mr Meldrum said:

I believe we have something in excess now of 7,000 cattle recorded on our computer being the female offspring of BSE infected cows. There are a few males as well but mainly we have been recording the female offspring. We are limited to the information given to us by the farmer at the time of the inquiry; he may not be able to cast his mind back one or two years to know all the offspring. Certainly all the female offspring which are reported to us are recorded on computer, therefore we have the unique identification number of that calf. If we wanted to trace those calves, we would start on the farm where the case of BSE was confirmed, and we would move forward using their movement records, which they have to keep by statute, until we find the cow when it has been sold on to market, because they are uniquely identified for all their lives. When we trace for other reasons, for break-outs of tuberculosis and brucellosis, we have had a very high success rate of finding them when they have moved off the farm.\footnote{IBD1 tab 7 p. 130}

5.38 On 27 June 1990 MAFF submitted a supplementary memorandum to the Select Committee. Under the heading, ‘Recording Ear Numbers of Offspring of BSE Affected Cattle’, the memorandum read:

Ear numbers of offspring of BSE affected dams have been recorded on computer since 9 June 1987. However, retrospective information has been recorded where it is available. This includes details of the presumed earliest cases in 1985. At the time of writing, details of 7,321 female offspring are stored on the computer.\footnote{IBD1 tab 7 p. 155}

5.39 On the same day, Mr Gummer appeared before the Select Committee, and was also questioned about the NFU’s evidence that the current tracing system was unlikely to produce complete records. Mr Gummer answered that:

. . . we do have detailed computerised records of the offspring of all BSE dams. Those are held by the CVL – the Central Veterinary Laboratory. All farmers have to maintain records of animal movements for three years. We do have that information. We use that information very effectively in dealing with other kinds of diseases which are different in their effect . . . I think it would be wrong to say we did not have an effective method. What we are concerned about . . . is BSE, if we are dealing with maternal transmission . . . [t]hree years is not a long enough period to keep the records. We have extended the period records have to be kept to ten years and we have been recording the ear numbers of BSE infected dams since 9 June 1987 . . . I believe we have now got a system which is an effective one. We have extended the time. I am looking at the possibility of using a similar system to that which is used in Northern Ireland but so far it does not seem to be the right answer.\footnote{IBD1 tab 7 p. 176. Note that although Mr Gummer stated that ‘we have extended the period records have to be kept to ten years’, the Orders which would implement this policy decision had yet to be signed. The relevant Orders came into force on 15 October 1990 – see para. 5.62}
MAFF officials discuss the issue

5.40 On 2 July 1990 Mr John Maslin, of AHD Branch A (Notifiable Diseases), circulated amongst various MAFF officials the responses received during consultation on the proposed changes to farmers’ breeding and movement record requirements. In his covering minute, Mr Maslin noted that the NFU had raised the ‘computerised system’ issue with the Agriculture Select Committee. He said, ‘I believe we should arrange a meeting with them to discuss it as soon as possible and persuade them that it must be looked at after the current proposals are enacted’. 2055

5.41 Mr Iain Crawford, Director of the Veterinary Field Service (VFS), replied two days later and commented, ‘Retaining and updating breeding records centrally would be a very large commitment and the first question would have to be, what is the purpose and can it be justified’. He therefore agreed that ‘the NFU should be advised that it is a topic for consideration at a later date’. 2056

5.42 On 10 July 1990 Mrs Attridge suggested to Mr Meldrum that:

On the identification system the important thing is to ensure that the records will be adequate to check back and get the information needed. There are attractions in a fully computerised system but I expect it will be some time before this is a practical reality. 2057

The Agriculture Select Committee’s recommendation

5.43 The Agriculture Select Committee’s report was published on 12 July 1990. It noted:

If vertical transmission were proved to take place, the policy implications would be substantial. The slaughter of the offspring of BSE-infected cattle or a ban on breeding from these offspring might be warranted on precautionary grounds. 2058

5.44 However, it was concluded that the ‘available scientific evidence is inconclusive whether vertical transmission of the disease is likely; it is certainly not a development which any expert seemed prepared to rule out’. 2059

5.45 On cattle-tracing, the report stated:

Suppose in two or three years time research demonstrates conclusively that maternal transmission of the BSE agent is possible? The Ministry will need to act swiftly, in the light of such a conclusion, to identify, examine and, if necessary, slaughter many thousands of cattle which may have been affected by this route. If it does not have the necessary information, it will not be able to do this satisfactorily: a comprehensive system for identifying and tracking animals is needed. MAFF is seized of this point – which Sir

2054 included in the circulation list were Mr Meldrum, Mrs Attridge, Mr Crawford, Mr Lowson, Mr K Taylor, and Mr Lawrence
2055 YB90/07.02/7.2
2056 YB90/07.04/17.1
2057 YB90/07.10/17.1
2058 IBD1 tab 7 p. xi
2059 IBD1 tab 7 p. xi
Richard Southwood has also emphasised – and has consulted the NFU and other interests about possible ways of achieving this.

At present what is proposed is:

i. an early amendment to the Movement of Animals (Records) Order 1960, requiring farmers to keep cattle records for 10 years rather than the present 3 and maintain fuller breeding records; and

ii. a comprehensive revision of that Order.

We welcome these proposals but urge MAFF to move towards the full centralised computerisation of the relevant information and not rely on a complicated paper-chase through farmers’ records. Some computerisation is already in place, in that the ear numbers of offspring of BSE-affected dams have been recorded on computer since 9 June 1987. But there is a danger of settling for some sort of half-way house in which only first generation offspring of known BSE cases are monitored effectively. Cows can have calves when they are less than two years old so, because the disease’s incubation period is much longer than that, a cow can be a grandmother and great grandmother several times over before her sickness is diagnosed. . . . The logging of the parentage and movements of all cattle, and the retention of that information in a central database, must be the objective of any scheme MAFF introduces. Every individual bovine animal should be traceable from birth, in much the same way that a car is.

Such arrangements already pertain in Northern Ireland and we believe that, with the technology now available and the expertise held by bodies like the Milk Marketing Board, MAFF can have no excuse for not introducing them in the rest of the United Kingdom at an early opportunity. They will form a useful adjunct to the control of BSE and other diseases of cattle and funding for this purpose should be made available without delay, with the initial costs being met by MAFF.2060

5.46 In a statement to the Inquiry, Mr Meldrum suggested that the basis of the Select Committee’s recommendation was that if maternal transmission of BSE were to be proved, MAFF would need to ‘act swiftly to trace, identify, examine and, if necessary, slaughter many thousands of cattle’. He said, however, that the recommendation ‘failed to take account of the time needed to set up any system and that it would be very difficult to capture retrospective data’.2061

5.47 Sir Derek Andrews (MAFF’s Permanent Secretary 1987–93) said in a statement to the Inquiry that the Select Committee’s ‘assumption, and the analysis on which it was based, were not endorsed by MAFF’s advisers’.2062 Ministers were advised via the SVS paper forwarded by Mr Lowson in February 1990 (see paragraph 5.13) that even if maternal transmission occurred, slaughtering the offspring of affected cattle was not necessary to control BSE:
To maintain an epidemic of a fatal disease in a population it is necessary that each case gives rise to at least one more before dying . . .

Maternal transmission alone is incapable of maintaining the epidemic. It has been calculated that only one in five calves born is kept for breeding. On average each BSE cow will have produced $2\frac{1}{2}$ calves . . . , so even if maternal transmission were to occur invariably the disease would, on this scenario, be self limiting, although the number of cases would be greater and the time taken longer than if there was no maternal transmission. 2063

**Initiation of MAFF’s feasibility study**

**MAFF’s reaction to the Agriculture Select Committee’s report**

5.48 On 17 July 1990 Mr Lowson, Mr Capstick, Mr Meldrum, Mrs Attridge and others met Mr Derek Andrews to discuss the Government’s response to the Agriculture Select Committee’s report. The note of the meeting records that in respect of the Select Committee’s recommendations:

It was concluded that when recording parentage it was only necessary to identify the dam. This point would need to be explained to the Select Committee. It was considered that in the longer term there would be electronic identification of cattle. In the meantime one would need to tighten up the present arrangements where it was possible. This point would need to be covered in the advice to Ministers. It was agreed that [MAFF’s ITD] should be asked to initiate a study into a computerised system for identifying and tracking animals. This study should be referred to in the response to the Report. 2064

5.49 Two days later Mr Lowson circulated a draft submission for the Minister, to Mrs Attridge and others, ‘on the points on which decisions are required before a response can be published to the Select Committee Report’. Mr Lowson noted in his covering minute that:

I am conscious that many of the items covered raise issues outside my own area. I would be glad if other Divisions could therefore scrutinise it very carefully (especially . . . a study on computerisation (ITD) . . . 2065

5.50 The final submission was put to Mr Gummer on 24 July 1990. On the computerised system proposed by the Select Committee, Mr Lowson suggested a feasibility study should be implemented:

The value of the computerised information would still depend on the reliability of the identification systems and of the data recorded by farmers. These considerations mean that commitments about a computerised system should not be taken lightly; and in the absence of a European standard for electronic identification (without which the manpower requirement would be even larger than it will in any case) firm decisions would be premature.
Furthermore such information may never be needed for the control of BSE . . . But if in future a control programme were found to be necessary, it might well require comprehensive tracing of affected lines, which would be a formidable task if based on written records held at each farm . . . it would therefore be worth initiating a study of possible alternative systems of data management – though without commitment in view of what could be very heavy resource costs. This could take account of other possible requirements for data manipulation in the Single Market context, and of systems already available. 2066

5.51 Mr Lowson noted that ITD was already studying an IT strategy for the SVS and the AHG (see paragraphs 5.27–5.31). He therefore recommended that ITD ‘incorporate within this an appraisal of the possible data requirement for a disease control system and of the best way of meeting this need’. 2067

5.52 On 25 July 1990 Mr Gummer met Mr Andrews, Mr Lowson, Mr Capstick, Mrs Attridge, Mr Meldrum, Mr Crawford and others, to discuss Mr Lowson’s submission. It was agreed that the Government’s response to the Select Committee report would indicate that a feasibility study into the proposed computerised system was being set up, ‘whilst going into some detail about the considerable practical difficulties which the recommendation involved’. The response would also refer to the question of who would pay for the system. 2068

First steps in initiating a feasibility study

5.53 On 3 August 1990 Mr Lowson circulated a minute that summarised the action necessary following the meeting with Mr Gummer. He asked Mr Derek Selwood of the ITD for advice on how to set up the study into computerisation of animal record-keeping and noted it was ‘clearly a topic which needs to be pursued with some urgency’. 2069

5.54 On 7 August 1990 Mr Long of the ITD presented to Mr Selwood his suggested approach for the ‘study to be referred to in [the Government’s] response to the Agriculture Committee’s report on BSE’. He noted:

Probably the most logical approach would be to use someone from the AHVG Study Team currently in place at Tolworth. In effect, this would be the first ‘candidate system’ we would look at in detail (the study team has already identified it as such, although with hitherto low priority). We have already promised to start work on identifiable systems as soon as possible, without necessarily waiting for the end of the study. But you should be aware that Mrs Attridge is not enthusiastic about animal tracking systems – she surprised us on Monday by stating that, at a meeting at the end of last week, it had been decided that such a study should not be recommended. This contradicts the documentation we have seen, and will need to be clarified. In any event, any decision to hold up the Sub-Strategy Study itself or the work which would follow on from it so as to give priority to this new exercise would likely be unpopular with our AHVG clients, for the usual reasons. 2070
The following day Mrs Attridge emphasised to Mr Lowson the costs of a central computerised system:

Since all farmers will have to keep the records we will have to assume that many of them will not have computers and that they will rely on normal paper records. This in turn would mean that any fully computerised system would require the farmer’s paper records to be translated on to computer, presumably by the Ministry, and this would have a considerable clerical cost. Any study of a computerised system must therefore take into account the practicalities of setting it up and not be enticed by the more elaborate arrangements under consideration by the MMB [Milk Marketing Board], MLC and Professor Wilson [see paragraphs 5.77–5.80 below]. No doubt Mr Selwood will be very conscious of the costs and benefits of any computerised system and you will need to be in close touch with him as to its objectives.2071

On 9 August 1990 Mr Selwood advised Mr Lowson on how to establish the study. He said that he shared Mrs Attridge’s reservations, ‘and I am glad that the question of who should pay for the system has captured the Minister’s attention’. Mr Selwood continued:

Useful terms of reference for an initial study would include: investigate the options available (i.e. do nothing, put in a full tracking system, do something in-between); look at systems used by other countries; estimate the likely costs/benefits; and make recommendations regarding future action. The resulting report . . . wouldn’t answer all the questions, but would provide a useful basis for discussion on whether or not, and if so how, we should go forward . . .

The most logical approach would be for us to use someone from the AHVG Study Team currently in place at Tolworth. In effect, this would be the first ‘candidate system’ we would look at in detail. (The study team has already identified it as such, although with hitherto low priority.) We estimate that a useful report could be produced over about two months by diverting someone from the overall study, which would then take a little longer to complete.2072

On 13 August 1990 Mr Anthony Matthews of the ITD replied to Mr Long’s minute of 7 August. He suggested that a feasibility study of the user requirement was needed, but ‘exactly what the user requirement is may not be fully agreed on at the moment, even at the high level’. Mr Matthews thought that Mrs Attridge’s attitude to animal tracking systems, as reported, was ‘also interesting’. He suggested that all interested parties needed to meet at management level as ‘I suspect that there may still be one or two fundamental issues to resolve about what actually is required before it will be possible to focus clearly on terms of reference’. 2073

Three days later, on 16 August 1990, Mrs Attridge minuted Mr Selwood about his minute of 9 August to Mr Lowson. The minute was copied to Mr Long. She said:
As you know, I chair the Project Board for the scoping study currently being undertaken at Tolworth. I am concerned by the suggestion in paragraph 5 of your minute that the Study Team should be diverted to produce the overall study if this means that the already delayed finish of the project would be further delayed. It is already 20% over cost and 6 weeks over schedule. I really feel we must get it completed and that if necessary we should go back to the Minister to find out just how urgent and how detailed a study he requires. My own impression from the meeting with the Minister was that he needed to indicate to the House of Commons Committee that he was fully aware of what computerisation had to offer but there is quite a lot of work, both in the EEC and through a Group chaired by Professor Wilson dealing with breed societies, MLC, MMB etc [see paragraphs 5.77–5.80 below], that would need to be taken into account. I doubt therefore whether any useful work can actually be done until we have some input on possible EC systems and the work of Professor Wilson’s Group and I would not wish the Study Group work to be further delayed simply in order to go through the motions.  

5.59 On the same day Mr Long minuted Mr Selwood about the proposed study. He commented that Mrs Attridge’s view, which ‘I think we’d all agree with’, was that if the proposed study was ‘so important then ITD ought to be given extra resources to mount it’. Mr Long thought that whilst Mrs Attridge was enthusiastic about the sub-strategy exercise, she ‘maintains that the animal tracking study is pointless at the moment’. Further, Mr Lowson, who Mr Long noted appeared to be under greater pressure than others, ‘appears negative about everything we are doing’.  

5.60 On 22 August 1990 Mr Lowson minuted Mr Philip Davies, AHD Branch D. He noted that Mr Gummer had agreed that the Government’s response to the Agriculture Select Committee should indicate that a feasibility study was being set up, and also explain some of the practical difficulties in establishing a computerised tracing system. Mr Lowson suggested to Mr Davies that the outcome of discussion with relevant colleagues should be a draft note for Mr Lowson to forward, setting out the terms of reference, cost of the study and timing considerations. He concluded:  

The starting point should be to establish a very clear description of what information is required for disease control purposes and how this is collected and used at present. The purpose of the study would be to consider how computerisation could help in fulfilling the purposes for which we require information and what it would cost.  

New record-keeping requirements come into force  

5.61 On 4 September 1990 Mr Alan Lawrence, AHD, BSE and Related Issues, forwarded a submission to Mr Gummer, inviting him to make the following orders:  

i. the Bovine Animals (Identification, Marking and Breeding Records) Order 1990, which would require owners of bovine animals to identify
them and keep a record of calves born into the herd, including the identification of the dam. This would have to be done within 36 hours of birth in the case of dairy animals or within seven days for all other cattle. The Order would also impose a duty on subsequent owners to link any replacement identification in their records to the previous one. The movement of an unidentified animal would be prohibited;

ii. the Movement of Animals (Records) (Amendments) Order 1990, which would make a simple amendment to the 1960 Order, requiring that records be retained for ten years instead of the current three years; and

iii. the Tuberculosis (England and Wales) (Amendment) Order 1990, to 'amend the Tuberculosis (England and Wales) Order 1984 by removing the identification and marking provisions from the Order and incorporating them (with minor amendments) into the Bovine Animals (Identification, Marking and Breeding Records) Order 1990'.


Further consideration of a computerised tracing system

Formulation of the feasibility study

5.63 Mr Gregg followed up the action requested by Mr Lowson on 22 August 1990 (see paragraph 5.60). On 18 September 1990 he provided a draft note to Mr Long, copied to Mr Lowson, which 'seeks to identify in broad terms existing information needs, how this is collected and used at present, and concludes with proposed terms of reference for a study . . .' On computerisation, the draft note said:

Technically, computerised central records are possible. The main difficulty foreseen is in obtaining the data and ensuring that it is correct and up to date. The scale of the exercise is daunting . . .

To provide the necessary data, farmers would need to supply details of animals born on the holding . . . as well as animals moved on or off the holding . . . Details of deaths on farm and of animals which [lose] their tags would also be needed.

The frequency with which this data should be provided and how it should be provided must be addressed. This will determine the usefulness of the system and it must be recognised that it will not dispense entirely with the need for Veterinary Officers to visit farms and markets to verify the details and initiate disease control measures following tracing.

5.64 The draft note set out possible terms of reference for the proposed feasibility study and recommended that it should not commence until mid-November, so that
it could be informed by an EC meeting on the topic (see paragraphs 5.71–5.73) and the Wilson Committee’s work (see paragraphs 5.77–5.80). Further, Mr Gregg noted that by that time the AHVG study team should have completed its work (see paragraphs 5.74–5.75) and could be released to undertake the feasibility study. 2079

5.65 Mr Lowson and Mr Lawrence met Mr David Maclean on 9 October 1990. On cattle-tracking, the note of the meeting recorded that:

[Mr Lowson] reminded Mr Maclean that the new cattle record keeping arrangements had been introduced on 15 October. However, we were being urged by some to go further, by introducing a computer-based system. This seemed inappropriate at present because our main need – to deal with outbreaks of disease – was adequately served by our current methods. Nevertheless, we had in hand a feasibility study designed to assess the benefits of a computer-based system. 2080

5.66 Two days before Mr Curry was due to meet Mr Kent of the Milk Marketing Board (MMB) on 31 October 1990, Mr Lowson provided a briefing paper. He noted that the use of electronic identification systems was an area to be approached with care, and that decisions had to be made taking account of what was happening elsewhere in the Community. He advised that the key point for Mr Curry to make was that MAFF’s interest was in having systems that enabled it to carry out disease control measures. Mr Lowson continued:

So far we have managed without a computerised system and it is not clear (although we will be studying this) whether such a system would be necessary to deal with BSE in the event that it turns out to be transmissible (as are most of the diseases for which we have control measures at present, without computers). 2081

5.67 Under the heading ‘Points to Make’, Mr Lowson wrote:

MAFF’s interest is not in having comprehensive records of all cattle; just in having records that are good enough to enable it to control disease effectively. There is a system of cattle identification and tracing already in existence which, although old fashioned, has proved effective when controlling outbreaks of notifiable diseases. This system has recently been strengthened in view of the problem of BSE.

MAFF already keep some information on computer and a feasibility study is being set up to consider the desirability and cost benefit of further development, in the light in particular of the Select Committee’s recommendation . . .

Improved identification systems are also high on the Community agenda in the context of the Single Market . . . It is clear that any action taken domestically will have to take account of what is happening at Community level. 2082
5.68 Mrs Attridge and Dr Danny Matthews were present when Mr Curry met Mr Kent. Mr Kent suggested it would be worthwhile for MAFF, MMB and the breeding societies jointly to look into the feasibility of setting up a livestock identification register. He believed that such a register would pre-empt any EU harmonised system and would be justified on food safety grounds in the event that tracing was required if maternal transmission of BSE was discovered. The note of the meeting records:

[Mrs Attridge] said that our current system of relying on farmers’ records satisfied the Department’s requirements for disease control. It would be difficult to justify a computerised system on food safety grounds and any suggestion that it was required for this might cause public disquiet. The cost of the Northern Ireland scheme was also a disturbing precedent.

Dr Matthews said that the fast response advantage of a computerised system was not necessary for a BSE traceback.2083

5.69 On 1 November 1990, during an informal discussion with Mrs Attridge and Mr Gregg, Professor Peter Wilson, Chairman of the Wilson Committee (see paragraphs 5.77–5.80), gave his opinion on the usefulness of a comprehensive cattle identification system for disease control. Mr Gregg’s minute recorded that:

Professor Wilson considered that the Ministry stood to gain from a competitive industry but the major advantage lay in an improved identification and recording system for disease control particularly in relation to parentage for diseases such as BSE and perhaps diseases which have yet to emerge. He put the present certainty of being able to trace the offspring of a BSE cow at no more than 50%. Milk recording was perhaps only 70% accurate as most farmers were looking for a herd rather than an individual index. However some breed societies were achieving 98% by virtue of enforcement using blood type checks. He saw considerable advantage for all in coming up with a standard identification code so that data on individual animals could readily be pooled.2084

5.70 Mrs Attridge told Professor Wilson that:

Our animal health data requirements were essentially very basic. There might be pay-offs for us in terms of accuracy, enforcement, rapidity of tracing and an ability to monitor imports, but it remained to be seen whether and how far the existing system needed improvement. There was merit in a single unique identification coding and it was expected that this issue would be resolved at Community level.2085

The European position

5.71 Mr Gregg and Mr P Philip,2086 represented MAFF at an EC-led seminar on ‘Automatic Electronic Identification Systems’ held on 17–19 October 1990. On 27 November 1990 Dr Janssen2087 circulated a note of the seminar’s conclusions...
and recommendations. It stated that reliable identification systems were needed for every animal in all Member States, so as to enable effective implementation of EU veterinary policy on animal health, public health, animal welfare and fraud prevention. Individual identification, registration of movements, and central database facilities were seen as important requirements for a reliable identification system.\textsuperscript{2088}

5.72 Dr Janssen also distributed an information note on identification of farm animals. The note advised that identification systems had to be compatible across Europe, so Community rules for their standardisation were to be introduced. The Community intended to convene a legislation working group to draft the necessary rules.\textsuperscript{2089}

5.73 Mrs Attridge told the Inquiry in oral evidence:

It was quite clear that that was the way that the wind was blowing, the Commission was going to go ahead with some form of computerised system. The problem was until they decided which one it was, it was difficult for us to see how best we could latch on to it.\textsuperscript{2090}

**Main report of the AHVG IT Sub-Strategy Study**

5.74 The IT Sub-Strategy Study, which had been initiated in March 1990 (see paragraphs 5.27–5.31), reported in November 1990. The study formulated four options for IT implementation for AHVG management to consider. The preferred long-term strategic direction was a ‘business-led’ option, which would make IT a major part and essential tool for most staff. However, it was recognised that there was an immediate need for flexible systems to meet existing needs and to respond to EU requirements. Option 5 was therefore formulated, which anticipated that some systems would be developed through intermediate stages, to eventually reach the preferred ‘business-led’ option. Within option 5, 17 systems were identified as ‘candidates’ for IT development. AHVG management evaluated the candidate systems and an overall ranking was determined to reflect priorities within AHVG.\textsuperscript{2091}

5.75 An animal tracing system, for use in ‘suspected disease incidents’, was identified as a candidate system for computerisation and was given a high implementation ranking. A national animal registration and tracking system was also identified as a potential candidate system. The report noted:

The whole area of animal tagging and registration (from which [the animal tracing system] would draw information) is a major issue within the AHVG, particularly in view of recent events surrounding BSE. As mentioned above, there is some IT already in place, but this is specific to the BSE system and does not meet the overall user requirements for registration and tracking. Because of the large size and wide scope involved, it was originally considered that this system should form a major study in its own right. In the light of the Parliamentary Select Committee on Agriculture’s requirement for the Ministry to conduct a study and the decision of the EC to undertake...
a pan-European study, a decision has now been taken to conduct a preliminary study in this area. This study should be incorporated within the implementation plan.2092

The Government’s response to the Agriculture Select Committee

5.76 In November 1990 the Response of the Government to the Fifth Report from the House of Commons Agriculture Committee 1989–90 was published. After noting that the report urged MAFF to move towards centralised computerisation of cattle records, the response continued:

15. Data about the offspring of known BSE cases are already maintained on computer. To go further, and maintain records of other cattle, would be a formidable task. A comprehensive system would need to identify and locate all female bovine animals (of which there are nearly eight million in Great Britain) and provide data on parentage and offspring. Updating would be needed whenever an animal moved or died.

16. The existing arrangements already provide the foundation for control measures based on the ancestry of progeny of BSE cases. It is of course inevitable that some animals might not be traced using these existing systems. But this would be true even of the most sophisticated computerised mechanisms. The Government therefore needs to assess whether defects in the present system would be so serious as to prejudice the effective control of the disease; and if so, whether computerised systems would in practice improve the situation enough to justify the massive investment required.

17. Among the factors that have to be taken into account are:–

– the fact that the value of the computerised information would still depend on the reliability of the identification system, which would rest on the accuracy and diligence with which farmers recorded the information;

– the size of the financial commitment that would be involved and how it would be funded – taking account of the possibility of industry funding; and

– the need for compatibility with systems that might be developed by the European Community.

18. This is an important issue and the Government is glad that the Report recognises this. The Ministry of Agriculture, Fisheries and Food accepts that a feasibility study is necessary, and intends to initiate one. This study will need to be informed by the results of a Community Seminar in mid-October on electronic animal identification, and by the work of the Wilson Committee, set up by the Milk Marketing Board and the National Cattle Breeders’ Association to consider identification systems.2093

2092 M11F tab 19 p. 44
2093 IBD1 tab 10 p. 3
The Wilson Committee

Role of the Committee

5.77 The MMB, in conjunction with the National Cattle Breeders Association (NCBA), established the Wilson Committee in April 1990. It comprised Professor Peter Wilson as Chairman, Mr Tom Kelly of Genus Management, Professor David Leaver of Wye College, Mr Duncan Spring of the Holstein Friesian Society, Mr Chris Bourchier as MAFF observer, and Mr Frank Armitage as secretary. Amongst other things, it was set up to:

i. review existing systems of cattle identification in the UK;

ii. establish the perceived information needs of the industry in the future;

and

iii. recommend appropriate changes and proposals for how the changes might be structured and funded.

The Committee’s recommendations

5.78 The Wilson Committee’s work coincided with the Agriculture Select Committee’s consideration of cattle-tracking, and associated deliberations within MAFF throughout the latter half of 1990. The Wilson Committee Report was published on 1 February 1991. A news release that day stated:

By 1995 all genetic and production information for dairy and beef animals in the UK should be co-ordinated by a national Cattle Data Centre . . .

By 31 March 1995 the Report recommends that the Cattle Data Centre should take responsibility for the co-ordination of all cattle ancestry recording, milk recording, linear assessment, beef recording and genetic evaluation in the UK. Until it becomes fully operational the Report recommends that the CDC should be funded by the MMB on a diminishing basis so that it is financially independent by 1995.

5.79 The summary of recommendations from the Wilson Committee Report was attached. Recommendations included:

i. The paramount aim of the Cattle Data Centre (CDC) was a profitable and efficient UK cattle industry able to compete internationally.

ii. A UK CDC should be established as a matter of urgency. Its task would be to link together and co-ordinate:

a. all existing cattle databases;

b. cattle identification within the UK on a unique number basis;

c. cattle ancestry and its validation within the UK;
d. all milk recording within the UK to International Committee for Animal Recording standards, including DIY recording;

e. beef recording within the UK;

f. genetic evaluation of cattle; and

g. linear assessment of cattle.

iii. The duplication of data collection, collation and authentication should be minimised; and

iv. MAFF should be encouraged to promote the formation of the CDC and to assist in obtaining funds to set up the CDC and its constituent database for the public good. ²⁰⁹⁷

MAFF’s consideration of the Wilson Committee recommendations

5.80 On 12 April 1991 Mr Lowson forwarded a paper to Sir Derek Andrews, Mr Capstick and Dr Bunyan ²⁰⁹⁸ among others. It contained a ‘response to the Wilson Report’. It noted that ‘Professor Wilson’s considerations are heavily biased towards genetic improvement, but he does identify a link with disease control or the “public good” as he calls it’. However, it was noted that the report did not draw any conclusion about a cost benefit of computerised records for disease control, nor did it give an indication of how the database would work in practice. The paper stated that responses to questioning about the report needed to emphasise that:

i. a unique identification number for cattle was an essential need for Community requirements and genetic improvement purposes, and MAFF was engaged in a study of this aspect;

ii. the Government’s need for information necessary for the control of animal disease was a distinct requirement;

iii. the Government had launched a feasibility study into the value of a computerised database for disease control purposes;

iv. disease control and monitoring requirements would need to take account of Community developments; and

v. although Government participation in the kind of arrangements envisaged in the Wilson Report was not ruled out, it was premature to discuss organisational issues before fundamental needs were clarified. ²⁰⁹⁹

²⁰⁹⁷ YB91/2.01/1.4
²⁰⁹⁸ Director General of ADAS
²⁰⁹⁹ YB91/4.12/2.4–2.5
MAFF’s Animal Tracking Project Board (ATPB) and the feasibility study

The role of the ATPB and its terms of reference

5.81 The ATPB was established to undertake the feasibility study referred to in the Government’s response to the Agriculture Select Committee. Members of the ATPB were:

- Mr Lowson, Chairman;
- Dr Matthews, Senior Veterinary Officer in the Notifiable Diseases Section of the AHVG’s Animal Health and Welfare Veterinary Section, Senior User, Veterinary Group;
- Mr Philip, Senior User, Veterinary Group;
- Mr Gregg, Senior User, Animal Health;
- Mr N Widden, Animal Health (Disease Control) Division, Branch A (Notifiable Diseases), Senior User, Animal Health; and
- Mr A Matthews, Senior IT.

5.82 Mr Long was the Project Manager and Mr Peter Johnson, an external consultant from PA Consulting, was Project Stage Manager. Mrs P Elliot of ITD was Business Assurance Coordinator and was responsible for supporting Mr Long with planning and business advice and for reporting to Mr Lowson on business aspects of the project.

5.83 The terms of reference of the ATPB were to:

1. Analyse [AHVG] information requirements and dataflows to enable individual animals (initially cattle) and herds/flocks to be traced for statutory purposes. Tasks include:
   - comparison of ID, recording and tracing procedures and systems in [Great Britain] with those in use in other EC countries;
   - assessment of possible impact of changing EC requirements on the need to identify and trace animals in [Great Britain] (especially post-1992);
   - assessment of possible impact of related initiatives both inside and out with MAFF (eg findings of the Wilson Committee).

2. Consider options available for identifying and recording cattle movements to enable the tracing of individual animals and herds, including estimates of likely costs and benefits and the applicability of system options to other species of farm animal.
3. Make recommendations regarding future action, and produce implementation plans:

- in the short term, in respect to disease control in cattle; and
- in the longer term, in respect to identification of all major species of farm animal for statutory, and possibly other, purposes.²¹⁰¹

5.84 On 18 January 1991 the first meeting of the ATPB was held, chaired by Mr Lowson. The minutes of the meeting record that:

1.2 Mr Lowson explained the dual origins of the project. First, the tracking activity was recognised as central to the responsibilities of the Animal Health Division, and the system had been identified as a candidate to be pursued under the recent AH/VG IT Sub-Strategy Study.

1.3 An essential part of disease control was the ability to trace the movement, progeny and ancestry of animals. The Division was concerned with all animal diseases, but only those identified as notifiable by a range of Statutory Instruments were likely to be subject to tracking. Different diseases had different information requirements, and any system would need to take account of the particular disease situation.

1.4 The second origin of the system had arisen through the undertaking made by the Minister to the Agriculture Select Committee after the BSE outbreak. The need was expressed to investigate the possibility of a computerised database to maintain records of animal movement, progeny and ancestry; this was in order to control BSE in the event that it might be found to be transmissible in the future.

1.5 AHVG felt, however, that several of the assertions connected with this perceived need would prove inaccurate or untrue, and that one of the main benefits of such a system would be to the cattle industry in its desire to facilitate improved herd management and the selection of optimum breeding lines. The AHVG group on the other hand was not concerned with this commercial issue, and was interested primarily in the possibility of easing the task of disease control. The Group already had a recently-extended requirement on farmers to keep breeding and movement records, and ran a successful manual system.

1.6 It would be the task for the study to focus on the AH needs for a computerised system, and to compare this requirement with the needs of the industry. Also to assess whether there was sufficient justification for development on either account, and to make recommendations accordingly. Animal Health Division would be responsible for the public presentation and further dissemination of the information in the report.²¹⁰²

5.85 The ATPB then discussed a Project Initiation Document prepared by Mr Johnson, which had been circulated to members on 16 January 1991.²¹⁰³ In
section 2 of the document, entitled ‘Project Objectives and Scope’, it was noted that:

The primary focus must be on identifying the system requirements (and possible solutions) necessary to enable the effective control of disease in cattle. However, given that certain diseases can spread between species, the applicability of such a system to non-bovine farm animals must also be assessed. 2104

5.86 During discussion of the document, Mr Long, the Project Manager, clarified that as indicated in section 4, ‘the audience for the interim report would be AHVG, and that they would be responsible for the public presentation of the final version’. 2105 Section 6 of the document set out the project plan, which anticipated that various options would be identified and evaluated. In response to Mr Matthews’ query as to whether it was possible that no option would be selected, Mr Lowson confirmed that ‘it was quite possible that the conclusion would be to do nothing for the time being, but to await developments in the Community’. 2106

5.87 The ATPB’s second meeting took place on 1 March 1991. At this meeting a document prepared by Mr Johnson entitled, ‘Current System – Description, Problems and Requirements’, was considered. The report separately considered identification records, movement records and tracing. It described existing procedures and requirements for each, and identified problems and weaknesses. It concluded:

The current system is labour intensive, slow and often unreliable. It is heavily dependent on good quality information being maintained on farms and elsewhere – this despite the fact that the record keeper usually has no business motive for doing so – and, failing this, the investigative abilities (and stamina?) of the Veterinary and Animal Health Officers in the field. Nevertheless, based on the published statistics for animal health in [Great Britain], the system would appear to be effective in controlling and containing the current crop of cattle disease.

HOWEVER

Were there to be a sudden significant increase in the number of herd breakdowns (TB or Brucellosis), an outbreak of a fast acting viral disease (eg foot and mouth), or a large-scale feed-related problem requiring rapid tracing, it is unlikely that the current system would provide the level of responsiveness or data quality necessary to adequately cope with the situation. It would certainly stretch to the limit AHVG resources in the Regions and current programmes of work would suffer badly. 2107

5.88 During the meeting Mr Johnson reiterated that if the EU was to require recording of movement details and the details of all stock held at each holding, a manual system could not cope, ‘and would certainly not be able to handle the rapid response needed if there was a major disease outbreak’. 2108
5.89 The note of the meeting records that Mr Lowson concluded:

. . . that some of the problems identified were practical difficulties posed by the physical identification of cattle in the farm situation and would not be solved by the ability to collect and manipulate data. As far as the IT solution was concerned, the main problem was simply the collection of data in a suitable format for entry on to the system . . .

The elements that needed to be considered were unique identification and how quickly AHVG needed to establish the association between the Identifier and the location which would be dependent on the particular disease requirement.2109

5.90 On 13 March 1991 Mr Johnson wrote to Mr Lowson setting out his proposed approach to the next stages of the feasibility study. He noted that it was unusual to identify options before the user requirement had been agreed. However, his view was that although AHVG was fairly certain about its own internal requirements on animal tracking, it still did not have a clear idea of which EU and industry requirements it intended, or would be required, to satisfy. Thus, if the study was to proceed, it would have to be on the basis of ‘likely outcomes’.2110

5.91 Mr Long made a similar point to Mr Matthews on 19 March 1991. He noted that ‘AHVG want us to look at what is possible and identify options which appear likely to satisfy the emerging requirement’. He suggested that ITD would structure its report so as to present a number of possible requirement elements, indicating the source of each requirement (eg, AHVG or industry) so that AHVG could choose which should be investigated further. It would be for AHVG to ‘decide how far down the road they want to go’. Mr Long told Mr Matthews:

I share your concern that we should not seek to determine the requirement on behalf of AHVG . . . our initial aim is to provide information which AHVG can use in deciding on the exact shape of their requirement . . . like you I am keen that we should not waste time going round in circles ourselves, but look to AHVG for a clear lead in these areas.2111

5.92 The third meeting of the ATPB was held on 26 March 1991. Document ATS/91/03 prepared by Mr Johnson entitled, ‘User Requirement and Systems Options’, was discussed at length. The ATPB dealt with each option identified in the document:


This would mean no computerisation but the alteration of the current manual system in an attempt to satisfy EU Requirements for physical animal identification. This option would be unlikely to satisfy EU requirements for tracing, validation and cross-checking purposes;

ii. Option 2 – Automate Issue of Bovine IDs.

This would mean building on the current system and Option 1 with the
introduction of an authorisation system for the issue of bovine IDs. This option would also be unlikely to satisfy EU requirements for validation and tracing;

iii. Option 3 – Automate Current Tracing Procedures.

This would involve the automation of animal tracing procedures currently used in Divisional Offices. Although this system would be of benefit to the Divisional Offices by removing much of the paper work it would not solve any of the existing problems connected with identification and movement recording of animals;

iv. Option 4 – Centrally Record Bovine Births and Deaths.

Much of this system would mean relying on the farmer to provide up-to-date information. The main benefits would be to industry and the EU. The high cost involved would give a relatively small return to the Ministry;

v. Option 5 – Incorporate Movement Recording.

This system would also mean that farmers would need to provide up-to-date information of all movements on and off their holdings. The tracing of animals would be made much easier with this system but as there would be no records of movements at markets the information could not always be relied on;

vi. Option 5A – As above but include Market Movements.

This system would add movements at markets but to introduce this aspect would make the installation of such a system very expensive; and

vii. Option 6 – Introduce Movement Permit System Based on Health Status.

This option would satisfy EU and industry requirements and could be adapted for any animal. It would, however, be very expensive to implement. 2112

5.93 Mr Lowson told the ATPB that he thought that to meet AHVG requirements, ‘Option 1 was all that was needed with a few enhancements’. He believed that Option 4 would meet the Select Committee requirements and Option 6 would meet possible EU requirements. However, since EU requirements were not yet known, ‘it would be unwise to go ahead with Option 6 at this stage’. 2113

5.94 It was concluded at the meeting that before a report could be presented to Ministers, AHVG and ITD would prepare and exchange separate papers summarising their understanding of the position to date. 2114

5.95 On 12 April 1991, Mr Matthews minuted Mr Lowson with ITD’s summary of ‘where we have got to and what should happen next’. Mr Matthews summarised ITD’s understanding of AHVG’s position:
i. the current system, with modifications, was sufficient to meet AHVG’s immediate (known) requirements;

ii. a system to meet the Select Committee’s requirements, particularly on vertical tracing for BSE, would be ‘extremely expensive’, and would take some time to implement, by which time BSE might not be a problem;

iii. EC requirements were still emerging, and the feasibility study’s preliminary cost assessments demonstrated that to meet them in an ‘ideal’ way would be so expensive that efforts should be made to get the EC to ‘lower its sights’; and

iv. the cattle industry’s interest in such a system was driven by a separate and distinct need – to collect information for genetic evaluation purposes.2115

5.96 Mr Matthews suggested that ‘on this basis no further investigation work by ITD would be required and presumably you would report to Ministers on the above lines’. However, he went on to state that ‘we have considerable reservations based on study activity to date with regard to the existing system’s ability to form a base for future development’. This was because:

Firstly, AHVG’s own requirement has not, to date, been well defined, particularly in terms of:

– system responsiveness (ie ability to provide information within set timeframes)

– system capacity (ie ability and impact of handling increased volumes of transactions and data without affecting response times)

– system adaptability (eg to cover other species of farm animal)

– system auditability (ie ability to verify data held on the system by means of cross-checking, use of inventories, etc).

Our second major concern is that the various options we have proposed have not been explored in sufficient detail to provide reliable data on:

– costs

– benefits . . .

– internal (organisational) and external (client) impact.2116

5.97 Mr Matthews’s minute explained that ITD believed that the study should inform the reader what automated tracking systems could provide in the way of enhanced ability to identify and trace animals for animal health purposes, and show what the cost and likely impact would be. It would also be necessary to show the impact of not implementing an automated system, including the likely effects on
AHVG’s animal tracking ability, and MAFF’s ability to comply with EU requirements. Mr Matthews concluded:

This leads me to the conclusion that ATS/91/03 with its matrix of requirements versus options is too coarse a document on which to base firm conclusions. My recommendation to the Project Board is to carry the study forward and deliver a report that:

- draws together the work that has been undertaken so far on this study;
- tightens up on the AHVG requirement, addressing the points in paragraph 3 above (with help from your people); and
- recommends further exploration of some or all of the options suggested in document ATS/91/03, if not immediately then when EC requirements are better known.2117

5.98 During oral evidence, Mr Lowson stated that Mr Matthew’s minute was ‘a useful contribution to the discussion that was happening at that time in the project group’. He said:

It is clear that the part of the Ministry responsible for IT development had views about the ability of the system that we had at the time to cope with a substantial increase in tracing activity while acknowledging . . . that it would be very expensive. And whilst recognising, I think . . . that there was an EU constraint as well. The suggestion that Mr Matthews makes in this minute is that the conclusion of this stage of the study should be that further work needed to be done.2118

5.99 Mr Lowson responded to Mr Matthews’s minute on 7 May 1991. He apologised that he had been unable to fulfil his ‘side of the agreement’ by producing a note of what he believed should be done next. He explained that this was because he was having difficulty ‘in trying to define the task which we are asking you and your colleagues to carry out’. He amplified:

In most cases where feasibility studies are undertaken we know what the problem is and we are looking for ideas about how IT solutions can help us to meet those specific problems. In this case, because the initiative for action comes at least partly from outside, the task is much less clear. We are asking how, and indeed whether, IT can help us do the job that we are doing, taking account of how the job is likely to develop in the future. As you imply in paragraph 3 of your minute, this requires a clearer indication of what the essential elements of the job are than we have given you so far . . .

This leads me to a similar conclusion to yours, namely that the work so far lacks a really rigorous assessment of what the requirement is. Once we have got that, the rest of an interim report falls together fairly easily. I can therefore agree to what you propose and to the outline that was attached to your minute.2119
Mr Lowson reports progress to the Permanent Secretary

5.100 In the meantime, on 12 April 1991, Mr Lowson had sent Sir Derek Andrews a ‘note setting out the issues as they now appear’. The paper identified three ‘quite distinct needs’ driving current interests in a national computer database:

i. to respond to the perception that the UK has fallen behind its competitors in the promotion of genetic improvement, which was the motivation behind the MMB and NCBA setting up the Wilson Committee;

ii. to consider whether, particularly in relation to BSE, existing data collection and storage systems were adequate to deal with disease and contamination control requirements, and whether new technology could help meet those requirements better; and

iii. to be able to fulfil Community requirements, such as having mechanisms in place to enable the tracing of animals back to their original and holding premises, as would be required by 1993.2120

5.101 The paper noted that while the responses to these needs would differ, the common factor was the need for an effective system of unique identification. MAFF’s interests were considered:

The Ministry’s interests in any national database rest mainly with possible benefits for disease control since genetic improvement would be for producers to develop; we are only concerned with the regulation of animal breeding from the point of view of controls related to animal health . . .

As far as disease control is concerned, the Government’s response to the Agriculture Committee’s Report on BSE undertook to initiate a feasibility study looking at the question of a computerised database. An external consultant has been retained and work is well advanced with the aim being to present an interim report within the next few weeks. At the same time, discussions are under way within the Community on a common system for the identification of animals (a unique identification number) and a possible common movement records system. It will be important to stress the need for any scheme to be cost-effective, bearing in mind that existing systems have served us well in the past. But there are signs that the Commission and some Member States might envisage systems that could require massive resources. Clearly it will be important for any action taken by Government at a national level to be compatible with what emerges in the Community.2121

5.102 On 22 April 1991 Sir Derek Andrews replied to Mr Lowson. He stated that the issue of a national cattle database had:

. . . substantial resource implications. These need to be kept in the forefront of the discussions in Brussels and taken into our own thinking in developing the response to the Wilson Committee Report. I note that there will be an interim report available shortly from the external consultant. As soon as there is a draft of this Report available, I would wish it to come forward for
discussion at official level. It is important that the final version of the consultant’s Report takes into account all the relevant considerations.  

**The Interim Report**

5.103 On 29 May 1991 a draft report was circulated entitled, ‘Study to Assess the Feasibility of an Animal Tracking System for the Animal Health and Veterinary Group (AHVG)’ (the ‘Interim Report’). It had been written by Mr Johnson. The Interim Report’s management summary identified shortcomings in MAFF’s current animal tracking system as follows:

- ‘gaps’ in the system (eg lack of universal adoption of the MAFF-approved ID system, duplication of IDs, data lost through retagging, not all movements recorded, slaughtered animals not identified);

- audit and enforcement difficulties (eg few mechanisms for verifying identification and movement information, limited resources available to conduct physical inspections); and

- problems with data access (ie all identification and movement records held remotely).  

5.104 The summary noted that:

At present, AHVG does not feel that these shortcomings are seriously affecting its ability to contain and control animal disease in [Great Britain]. However, the system could not cope adequately with a situation requiring very large numbers of tracings, possibly in a short timeframe; nor will it comply with the emerging EC regulations concerning the identification and registration of animals, which could be binding on Member States by [1 January 1993].  

5.105 Two possible ‘pathways’ were described. First, MAFF could modify and enhance existing systems, applying IT where appropriate. The second option was to ‘build a new, fully automated, central system for animal identification and movement recording’. The first option ‘would primarily be plugging the gaps in the current system’ and would not ‘address the problems of audit/enforcement and data access, nor would it meet EC requirements’. The second option would not only address these problems, but would also ‘provide a “higher performance” system for AHVG which could cater for large numbers of tracings and be expansible to cover species other than cattle’.  

5.106 The management summary then considered the advantages and disadvantages of a new computerised system:

Based on an investigation of animal tracking systems in other countries, a fully automated system is technically feasible . . . Benefits from computerisation are reported to include:
significantly increased levels of data accuracy and accessibility, leading to much greater control over animal identification and movement for statutory purposes;

– rapid and fuller tracing of animals for disease control purposes, regardless of the numbers involved;

– the availability of statistical data on cattle, with particular application for epidemiological research.

However, initial indications are that, in [Great Britain], this would be a very costly exercise: broad estimates ranging from £3 million to £14 million, depending on functionality and approach, have been calculated for computer development and systems implementation; there would also be an administrative overhead for the responsible authority, particularly in the area of enforcement . . . Furthermore, such a system will impose a major administrative burden on sections of the cattle farming community and, for this reason, may meet with some resistance.2126

5.107 The management summary concluded:

The Ministry is likely to come under pressure from external sources, particularly the EC, to implement a pathway 2 solution. Because the various options have not been explored in sufficient detail, it is not possible to be at all conclusive about costs (including the cost to the industry of compliance), benefits (ie the ability to address current shortcomings and better meet requirements) and the internal and external impact of systems implementation. This is information that the Ministry will need if it is to take sound decisions about future courses of action with regard to animal tracking. It is therefore recommended that the study continue to the next stage: to examine more closely the options that have been identified, focusing on the factors above.2127

5.108 The introduction to the Interim Report, section 2, explained the reasons for the study. It noted that, with the exception of known BSE cases and their offspring, MAFF did not hold individual cattle data. In the case of an outbreak of disease, the farmers’ identification and movement records would have to be accessed and interpreted, which could be ‘a laborious and time-consuming task’ and was error-prone. The Agriculture Select Committee had recognised this and made its recommendations accordingly (see paragraph 5.45). The Government’s response had indicated that a study would be initiated, to look at the feasibility of establishing a system as envisaged by the Select Committee.2128

5.109 Section 2 also set out the objectives of the study, which were:

. . . to consider options for introducing a system into [Great Britain] that facilitates the identification of an individual animal, its parents, its offspring, and all locations at which it has been held, from birth to death, including all relevant dates; and to examine the feasibility of each option in terms of its cost/benefit, technical viability and acceptability (to all interested parties).
The primary focus must be on identifying the system requirements (and possible solutions) necessary to enable the effective control of disease in cattle. However, given that certain diseases can spread between species, the applicability of such a system to non-bovine farm animals must also be assessed. Additionally, given that industry interest in such a system is high, particularly in quarters where herd improvement is a major factor, the costs of incorporating their requirements should also be assessed, together with any commercial benefit that might accrue.

5.110 Section 4 of the Interim Report described MAFF’s existing cattle-tracing set-up. It noted that animal tracing for disease control purposes at the time involved accessing a small number, relative to the total, of movement and identification records. In 1989 fewer than 3,000 tracings had been undertaken, excluding those for BSE. In addition to accurate identification of animals and maintenance of their records, physically accessing the data was the main factor that influenced MAFF’s ability to trace an animal rapidly. The problems inherent in the associated paper chase were reiterated, and the Interim Report noted that MAFF ‘can carry out only a limited number of tracings before it begins to adversely affect other programmes of work’. It continued:

Notwithstanding the problems, the system is generally considered by veterinary and animal health staff to be effective in containing and controlling the current crop of cattle disease in [Great Britain]; and it operates at little cost because the administrative burden of record keeping and enforcement is outwith the Ministry.

5.111 The impact of proposed European Commission measures on domestic cattle-tracing requirements was considered in section 5 of the Interim Report. It suggested that ‘the EC plan to develop legislation to harmonise current systems of animal identification and registration (movement recording) across the Community’ could have major implications for cattle-tracking in the UK.

5.112 Section 6 of the Interim Report, entitled ‘User Requirements’, summarised AHVG’s requirement for an animal-tracking system as a system which:

i. could be ‘relied upon to provide complete, accurate and up-to-date animal identification and movement data’;

ii. enabled rapid tracing of animals in response to outbreaks of disease;

iii. could cope with increased volume of tracing for chronic diseases without seriously affecting work performance in other areas; and

iv. could be expanded to cover other animals.

5.113 A combined user requirement, which took into account EU and industry requirements, was set out at Appendix D1 of the Interim Report. Paragraph 6.4 drew conclusions as to how well the user requirements were met by the current system (an analysis of this was set out in full in Appendix D2), noting that it:

---

2129 M11C tab 10 p. 4
2130 M11C tab 10 p. 8
2131 M11C tab 10 p. 9
2132 M11C tab 10 p. 11
i. could not consistently support a 48-hour (or less) response time for tracings;

ii. would be seriously over-stretched if it had to handle a substantial increase in volumes;

iii. could not be relied upon to provide complete, accurate and up-to-date information;

iv. did not give adequate data on stock levels (at holding) and on slaughtered animals; and

v. could not be expanded to cover other animals on an individual basis.2133

5.114 The Interim Report’s recommendation was set out in section 8. It noted that in the forthcoming 6–18 months, the Ministry was likely to come under mounting pressure: from the EC to implement Directive 90/425 by 1993. This directive introduced a tracing regime for the trade in certain live animals and animal products. In addition, MAFF would be likely to face increasing calls from the cattle industry to provide or sponsor systems that gave immediate access to animal identification and movement details and from the general public to demonstrate that it was capable of dealing with a chronic disease that required rapid tracing of large numbers of animals. It was thus recommended that:

To achieve these external objectives, and better meet its own requirements for an animal tracking system for disease control purposes, a central, computer-based solution for recording animal IDs and movements is required. Initial investigations show that such a system would be very expensive, and that it would take a considerable time to implement as well as involving a large administrative overhead for both the Ministry and the farming community.

Because the options . . . have not been explored in sufficient detail it is not possible to be at all conclusive about costs (including the cost to the industry of compliance), benefits (ie the ability to address current shortcomings and better meet requirements) and internal (ie organisational) and external impact. The Ministry will need this information if it is to take sound decisions about future courses of action with regard to animal tracking. It is therefore recommended that this study proceed to the next stage: to examine more closely some or all of the options that have been identified and, for each, report on the factors outlined above.2134

Consideration of the Interim Report

ATPB considers the report

5.115 The ATPB discussed the Interim Report at a meeting on 14 June 1991. It was agreed that any comments on the report would be sent to Mr Johnson, who would produce a final report incorporating them. During the meeting Mr Johnson reminded the ATPB that a pathway 2 option – building a new, fully automated, central system – would leave AHVG better placed to meet an emergency situation,
but that more work needed to be done before a specific option could be chosen. The minutes record that:

Mr Lowson agreed that a new system might help deal with potential threats but that this was a highly speculative assumption at this early stage.\textsuperscript{2135}

5.116 The ATPB considered how AHVG would report to the Minister and Agriculture Select Committee. Mr Matthews’s note of the meeting recorded that, although there was agreement in many areas, there were still ‘one or two quite major sticking points’ between AHVG and ITD:

AHVG (rightly) point to the high cost of an IT system and a number of issues associated with data capture. We point out that the existing system, by AHVG’s own definition (let alone when one takes account of external pressures), does not meet the user requirement. The report itself struck a fairly good balance between these areas, and therefore was not disputed to any extent.\textsuperscript{2136}

5.117 According to Mr Matthews’s note, it was agreed that Mr Lowson would prepare a draft report to the Minister, to be circulated to the ATPB for comment, and that Mr Matthews would circulate a proposal on ‘how we carry this forward with regard to IT support’. Mr Matthews’s note said that the ITD:

. . . would be looking for a quite clear statement in [Mr Lowson’s report] that the existing system does not meet the stated requirement and is not expandible beyond a comparatively small increase in ‘traffic’ volume.\textsuperscript{2137}

5.118 The official minutes of the meeting recorded that:

It was agreed that AHVG would advise Ministers in the light of the study’s findings so far on a possible response to the recommendation of the House of Commons Agriculture Committee. [AHVG’s Information Technology Management Group] would need to consider how and whether the study should go forward, and if so on what basis.\textsuperscript{2138}

\textbf{Mr Matthews’s plan for further action}

5.119 On 4 July 1991 Mr Matthews circulated to Mr Lowson, Mr Selwood, Dr Philip, Mr Gregg and Mr Long his note of what he considered to be the next steps. On the existing animal tracking system, he commented:

I believe that the feasibility study work performed by PA [Consulting] has established that the existing Animal Tracking ‘support’ system is very limited, in all respects. It does not meet the user requirement for AHVG described in the interim report, and just cannot touch EC requirements referred to therein (although it is acknowledged that these are still emerging/under negotiation).\textsuperscript{2139}
5.120 Mr Matthews asserted that ‘any UK animal tracing strategy based on the existing system’ was limited in capacity and limited in terms of accuracy and completeness to tracing activities performed. These limitations made it ‘fairly self-evident . . . how unprepared, in terms of “support” systems as opposed to veterinary systems, AHVG is to deal with any significant increase in animal tracing activity’. 2140

5.121 In handwriting next to these comments, Mr Lowson noted that ‘back-up systems exist to compensate for inadequacies of tracing, random monitoring for all key diseases, compulsory sheep dipping. Tracing is just one element’. 2141 During oral evidence, Mr Lowson expanded the point he was making:

The point here is that tracing, as I say in the final sentence of that first note, tracing is but one element in a system of controlling diseases and I think it has to be understood that tracing is a very minor element in the machinery that is needed in order to deal with almost all animal diseases. 2142

5.122 With regard to next steps, Mr Matthews made the following points:

(a) For the report back to Ministers the IT element of the advice will be balanced to take account of the above. The limitations/risks implicit in the current system are considered extremely constraining, unacceptably so if contingencies involving significantly increased (against the current small volume) tracking activity are considered. However, the non-trivial nature of delivering an effective replacement system based on IT is well appreciated and should be acknowledged in the report;

(b) The ITD line will be that the risks are such that we cannot call a halt to work to try and identify improved systems at this stage. 2143

5.123 Mr Lowson made a manuscript note next to paragraph (a), which asked, ‘If a new situation arose which required a lot of tracing of individual animals – what circumstances?’ During oral evidence, Mr Lowson explained that he was making the point that Mr Matthews had not clarified exactly what circumstances might give rise to significantly increased tracking activity, and this was an issue that needed to be addressed. In particular, ‘how realistic was the possibility arising that a substantial extension of tracking activity would be necessary to meet AHVG’s needs?’ 2144

5.124 Mr Matthews’s note then went on to discuss a variety of follow-on actions. In closing, Mr Matthews offered to discuss and clarify the issues raised by him with Mr Lowson before Mr Lowson finalised his reply to the Minister. 2145
Mr Lowson’s draft submission on the Agriculture Select Committee’s recommendation

5.125 On 1 August 1991 Mr Lowson circulated a draft submission to the Minister, including a summary of the feasibility study for comments. Mr Lowson’s covering minute read:

1. I attach the draft of a paper to go to Ministers to deal with the recommendation of the Agriculture Select Committee last year that we should introduce a centralised computer system of animal records so as to deal with BSE. I would be grateful for comments, to reach by the time I return from leave on 2 September 1991.

2. This note takes account of the finding to date of the animal tracking feasibility study, which has looked at the whole range of AHVG’s requirements in the area of identification, movement, etc records. We need to consider what further work needs to be done in this area as a whole, and Mr Matthews and I are aiming to circulate short notes on the next steps, for consideration at the next meeting of the AHVG ITMG.

5.126 The draft submission read:

BSE: COMPUTERISED RECORD KEEPING

Background

1. One of the recommendations of last year’s report by the House of Commons Agriculture Committee was that a computerised system should be set up to record the parentage and offspring of all cattle. In response the Minister said that a feasibility study would be undertaken. We have pursued the study over the past year with the aid of the IT Directorate and an independent consultant. The coverage of the study was wider than the single issue raised by the Select Committee, because of the need to assess the options for fulfilling possible Community requirements for animal identification and tracking. How to pursue these wider aspects will need to be considered further in AHVG. But it is possible to draw conclusions now about the Select Committee’s recommendation.

Objective

2. Neither the Select Committee nor those who advocated the creation of a computerised database (among whom the NFU were prominent) produced detailed arguments about how it would work or what it would be designed to achieve. It was however widely believed that if BSE were to be transmissible from dam to offspring it would be necessary to slaughter all offspring of BSE cattle in order to achieve eradication of the disease. Although the identities of known offspring of BSE cattle are recorded so that they can be identified when marketed so as to avoid their being moved out of the UK, the theory presumably was that a new system was needed to
locate all the calves of BSE cattle so that they could be found and dealt with. As the Tyrrell Committee made clear in its advice on the control of BSE, however, the basic premise is faulty; if the disease is transmitted only to the calves of animals which eventually show clinical signs, it would still die out of its own accord, but if other routes of transmission occur (as they appear to in the case of scrapie) slaughtering such calves would not be enough to eradicate it. Another factor was that when public concern about BSE was at its height farming organisations were looking for ways of securing guarantees that the animals that were bought on the open market were not the offspring of BSE cows.

3. Developments over the past year have reduced the pressure for action. Overall concern about BSE has subsided; while disease has occurred in one animal where maternal transmission appears to be the most likely explanation, it is only one, so the evidence at present is that maternal transmission is not likely to be an important factor in the future of the epidemic; and while the cattle market as a whole has been depressed there is little sign of differentials depending on whether or not an animal is the calf of a BSE case. Furthermore if epidemiological forecasts turn out to be right the number of cases will be falling rapidly by the time a system is running and data relating to the peak of the epidemic will be gone forever.

Feasibility Study

4. The key findings of the study as regards the Select Committee proposal were:

(i) a fully automated system of cattle records is technically feasible – indeed several European countries are already embarked on systems like the one advocated by the Select Committee;

(ii) a system which simply provided records of the offspring and parentage of cattle would be of limited use for the control of diseases other than BSE (and, as indicated above, its value in dealing with BSE is limited too). An elaborate computerised animal identification and movement record system might have wider application – but even so its value in improving our ability to deal with most known disease problems would still probably be limited. While there is no doubt that such a system would greatly improve the amount of data available to assist in disease enquiries, it is less clear that this would yield benefits in line with the costs (see (iii) below). IT investment could well pay higher dividends if applied to other aspects of disease control;

(iii) the cost could be very high; depending on the approach used and range of functions offered by the system, initial costs could be in the range of £3-14 million, and annual costs £0.5-6 million;

(iv) although a computerised system is technically feasible, it would stand or fall on the readiness of those involved in the animal trade to record data with the necessary speed and accuracy; and
(v) the Community is developing its own system of animal identification and record keeping. Any UK system would need to be compatible with that, and therefore to avoid becoming too far developed before decisions had been taken at a Community level.

Conclusion

5. There appears to be no case for accepting the Select Committee’s recommendation. It was initially based on a wrong premise (that the wholesale slaughter of calves might be necessary to control BSE); the factors that gave rise to premise for action have diminished considerably; and a computerised system to replace existing manual record keeping, while technically feasible, would be very expensive, perhaps not cost-effective even if applications other than the control of BSE are considered (although these need to be considered further, and need to be developed, if at all, in line with a Community system).

6. Ministers have not given any commitment to communicate further with the Agriculture Committee on this topic. However if the conclusion in paragraph 5 is accepted it would make sense for the Minister to round off consideration of the Select Committee Report by writing to the Chairman, and a draft letter is attached.

5.127 The attached draft letter to Mr Jerry Wiggin, Chairman of the Agriculture Select Committee, noted:

A number of interesting conclusions arise from this study. It is clearly feasible at a technical level to develop a centralised system to hold data on the identity, breeding, and movements of all cattle. Costs would depend on the kind of approach adopted and the range of functions that the new system would carry out, but they would be very high. It is not easy to demonstrate that the investment required would be worthwhile in disease control terms – even taking account of applications that go wider than the control of BSE alone.

5.128 The draft letter concluded:

I do not want to be obstructive on this question. If it could be shown that computerised record keeping could materially help us deal with the disease then I would want to pursue it, as I have pursued every other control measure supported by independent scientific advice. We will have to continue to study possible changes in our record keeping arrangements in the context of developing Community requirements, and we have made changes to our existing rules to cater for the problem of BSE. But I have to conclude that at this stage there are no grounds for pursuing the kind of system that your Report advocated.
AHVG officials comment on the draft submission

5.129 Mr Meldrum responded to Mr Lowson’s minute on 2 August 1991. In general, he agreed with the arguments put forward by Mr Lowson for concluding that there appeared to be no case for accepting the Agriculture Select Committee’s recommendation. In a statement to the Inquiry, Mr Meldrum gave an indication of his thinking at the time:

In the context of the issues being looked at by this Inquiry, unfortunately a cost effective case was not made for a cattle tracking system to deal with either BSE or the rather more run of the mill cattle diseases present in the UK at that time. So far as the latter are concerned I was extremely disappointed at the outcome of the feasibility study because I was committed to the eradication of the serious cattle diseases such as tuberculosis and brucellosis but, as far as BSE was concerned and for the reasons explained in the documents that I wrote at the time, there was little if anything to be gained in the short term from a system of computerised recording of cattle movements.

5.130 Mr Bradley expressed his agreement with the draft submission to Mr Lowson on 5 August 1991. Mr Kevin Taylor, who had seen Mr Meldrum’s response, suggested one further drafting amendment on 7 August 1991, and Mr Wilesmith did not raise any major points.

ITD’s comments on the draft submission

5.131 On 5 August 1991 Mr Matthews sent Mr Johnson a copy of Mr Lowson’s draft submission. In his covering minute, which sought Mr Johnson’s comments on the draft submission, and which was not copied to Mr Lowson, he commented:

What strikes me is that this focuses totally on BSE, with no real reference to Animal Tracking generally. It is obviously in response to this paper that we need to make some of the points made in the feasibility study about general unpreparedness etc . . .

5.132 Mr Johnson replied on 13 August 1991. In addition to suggesting some minor drafting changes, he commented that:

Para 5 seems too strongly worded. It may be true that a computerised system would be of limited benefit for BSE; but it could help considerably dealing with a “son of” situation should one crop up sometime in the future, which is, in part, what the Select Committee was driving at. I appreciate the reasons why [Mr Lowson] has confined his comments to BSE, but he leaves himself open to criticism if he does not address animal tracking on a more general basis.
5.133 In a minute discussing aspects of the feasibility study, which was sent to Mr Lowson on 15 August 1991, Mr Matthews commented that:

If AHVG’s judgement is that the risk from emergencies requiring larger numbers of tracings is so insignificant as not to require any increase in tracing capacity, then of course ITD would accept that judgement. However, from the business analysis work done so far the ITD view (and given the numbers and percentages involved, I think the ‘commonsense’ view) is that the low capacity of the current system in comparison with the known population is such as to create a potentially very risky situation if future large scale tracing has to take place.2159

5.134 On 21 August 1991 Mr Matthews, having received Mr Johnson’s comments on Mr Lowson’s draft submission, minuted Mr Lowson further. He opened by noting that ITD had concerns about the ‘nature and capacity of existing tracing procedures, whether in the BSE context or any other’. Mr Matthews then set out ITD’s concerns with Mr Lowson’s draft submission:

Whilst we appreciate that the primary focus of your briefing has to be BSE, we consider that the absence of any reference to wider aspects of the feasibility study’s findings (particularly limitations in the ‘support’ systems for tracing) may be counter-productive in the long-run. In the event of a ‘son of BSE’ situation, particularly one that required levels of tracing well above the limits of the existing system, we might have some difficulty in defending the restricted context you propose for the Minister’s reply, particularly as presented in the final paragraph of the draft letter.

Our view on this key point is that the reply should be broadened to draw out the fact that the feasibility study has highlighted areas where current systems can be improved. We could also make the more positive point that both in the short and longer term we are actively pursuing the use of IT to develop and enhance the support systems to the Veterinary/Professional staff. We suggest that this sort of flavour should be injected into both the second and final paragraphs of the draft letter.2160

5.135 Mr Matthews then commented specifically on paragraph 5 of the submission, which had concluded that a computerised system as envisaged by the Agriculture Select Committee was not needed:

Given what we’ve said above you will recognise that we think paragraph 5 of the briefing is too strongly worded. It may be true that a computerised system would be of limited benefit for BSE, but it could help considerably in dealing with similar situations if they crop up in the future. AHVG is much better placed than ITD to interpret if the Select Committee’s thinking was totally confined to BSE or not, our view from a more general business analysis perspective is that, with regard to the systems that support AHVG’s business in this area, there are currently weaknesses that can and should be addressed.2161
5.136 Mr Matthews concluded by saying, ‘I hope this is helpful. Please get back to me if you wish to discuss this further’.\textsuperscript{2162} We have been unable to find evidence that Mr Lowson responded, and in oral evidence, he stated that he did not remember ‘one way or the other’.\textsuperscript{2163}

**Mr Lowson’s final submission to the Minister**

5.137 Mr Lowson’s final submission was forward to Mr Gummer on 11 October 1991. The covering minute read:

One of the recommendations of the House of Commons Agriculture Committee when they reported on BSE last year was that we should introduce a computerised system to record the parentage and offspring of all cattle. In our response we said that a feasibility study would be undertaken and the attached note summarises the results.\textsuperscript{2164}

5.138 The final submission did not differ significantly from the draft that Mr Lowson had previously circulated.

5.139 The draft letter to Mr Wiggin attached to the submission, which, in the event, was not sent to Mr Wiggin, was amended to read:

If it could be shown that computerised record keeping would be a cost effective help to us in dealing with the disease then I would want to pursue it. But this is not the case . . . I have to conclude that at this stage there are no grounds for pursuing the kind of system that your Report advocated in the context of our national measures for dealing with BSE.\textsuperscript{2165}

5.140 In a statement to the Inquiry, Sir Derek Andrews said that he agreed with the submission’s conclusion that there was no case for accepting the Agriculture Select Committee’s recommendation for a computerised database. He considered that the submission summarised the key findings of the Interim Report, and its purpose was not to provide a detailed summary of the Interim Report.\textsuperscript{2166}

5.141 On 21 October 1991 Mr Matthews sent Mr Selwood of the ITD a copy of Mr Lowson’s final submission. He noted that, when the submission was still at the drafting stage, he had suggested to AHVG that both it and the draft letter be broadened to ‘at least expose slightly the fact that not everything in the garden was lovely with regard to current systems’. He further commented: ‘You will see that, although he has made one or two cosmetic changes in our direction, the papers remain very much as originally drafted’.\textsuperscript{2167}

5.142 Mr Gummer’s Private Secretary replied to Mr Lowson on 23 October 1991. He wrote on the covering minute of Mr Lowson’s submission, ‘Thank you: The Minister decided not to write to Mr Wiggin’.\textsuperscript{2168}
5.143 In a statement to the Inquiry, Mr Capstick set out his recollection of the circumstances of Ministers’ decision on the implementation of a computerised cattle-tracking system:

I cannot now recall discussion of the whole matter with Ministers in October 1991, but they made the decision, that the proposed system should not be pursued, on grounds that (a) a system, capable of dealing with BSE, at the time already existed; and because of: (b) the complexity and risks attached to the proposed system; (c) the timescale involved in its creation; (d) the cost to Government and industry of such system; and (e) the uncertainty about a common system being considered for the European Community.\textsuperscript{2169}

**Events following the Minister’s decision**

**Circulation of the Final Report**

5.144 As recorded in a minute from Mr Matthews to Mr Lowson, at a meeting on 6 December 1991 involving Animal Health (Disease Control) Division and ITD staff, it was agreed that work on the feasibility study report should be considered complete, and that the report could be circulated. Any further action would await clarification of new EU requirements. Mr Matthews noted that at the meeting he raised the issue of how AHVG intended to respond to the findings of the feasibility study, ‘which indicated that existing manual animal tracking systems are fairly limited in scope’. In his minute, Mr Matthews also took the opportunity to:

. . . echo the concern expressed in the feasibility study about the possible adverse consequences of having to depend on the existing manual system if emergencies involving increased numbers of trackings arise.\textsuperscript{2170}

5.145 Mr Geoff Sheldon of ITD distributed the Final Report within MAFF on 23 December 1991. His covering minute confirmed:

The Minister [has] accepted AH(DC) [Animal Health (Disease Control)] Division’s recommendation not to proceed with the development of a computerised system.

At a meeting with AH(DC) Division earlier this month it was agreed to draw a line under this study but for any follow-on work to await AH(DC)’s report on the latest EC Directive on Animal Identification. The report is therefore being circulated for information. AH(DC) will keep under review the need for follow-on work by ITD including any requirements for interim facilities as discussed in the report.\textsuperscript{2171}

**MAFF publicises its decision on a computerised database**

5.146 On 10 January 1992 Mr Lowson sent Mr Curry a draft speech and speaking note for use at the British Cattle Breeders International Conference on 14 January. The prepared speech stated that MAFF aimed ‘as far as possible to build upon our
existing tried and tested system, and to avoid the need for expensive computerised support’. The speaking note attached included the following:

Attempts have been made to convince us that a computer system would provide substantial benefits for animal and therefore public health. We have carried out a feasibility study, using external consultants, which has shown this not to be so.2172

5.147 Four days later, Mr David Rossington, Principal Private Secretary to Mr Gummer, wrote in a letter to Mr Hawker of the MMB:

A feasibility study has been carried out to assess the extent to which a computerised data base could support the control of animal diseases. It has been concluded from the research carried out by external consultants that there is no cost benefit for animal health in moving away from the present on-farm movement records which continue to serve us well.2173

5.148 On 13 February 1992 Mr Lowson sent Mr Gummer a briefing note, which included information on the feasibility study. Mr Lowson wrote:

The House of Commons Agriculture Committee’s report on BSE included the recommendation that a computerised animal identification and tracking system be set up. A feasibility study led to the clear conclusion that such a system would not be cost effective.2174

5.149 Mr Lowson suggested the following line for Mr Gummer to put to interest groups:

A feasibility study carried out by an external consultant has shown that a computerised animal identification system would not provide substantial benefits for animal and public health.

The present system is adequate for disease control purposes and does not require a fundamental overhaul although we recognise that there is scope for tightening up and improving compliance.2175

The Agriculture Select Committee revisits the issue – 1994

5.150 On 30 June 1994 the Agriculture Select Committee announced that it would be undertaking an inquiry into methods of identifying farm livestock. This followed the Select Committee’s inquiry into health controls on the importation of live animals, during which ‘it became clear to us . . . that there were sufficient important questions left unanswered to justify a separate inquiry into the identification and registration of farm livestock’.2176 Two issues on which the Select Committee advised that it would concentrate its enquiries were:

2172 YB92/1.10/3.4
2173 YB92/1.14/1–1.2
2174 YB92/2.13/3.2
2175 YB92/2.13/3.4
2176 M11A tab 1 p. vii
the desirability and practicality of identifying and registering individual animals and establishing a centralised national database;

the information to be included on any central database and its potential uses.2177

5.151 MAFF submitted written evidence to the Select Committee on 7 October 1994. The paper briefly set out MAFF’s conclusions on the Select Committee’s 1990 recommendations on a national cattle identification database, and the reasons supporting them. It also set out the possible uses of a database, including disease tracing, genetic information, ear tag control, subsidy checking, export certification and import checks, and the perceived drawbacks of such a database.2178

5.152 Before the Select Committee finalised its report, the Bovine Animals (Records, Identification and Movement) Order 1995 came into force on 30 January 1995.2179 It revoked and replaced the 1990 Order, and implemented the provisions of Commission Directive 92/102/EEC.2180 The identification and recording obligations upon farmers did not change, though the new computerised Ear Tag Allocation System (ETAS) was introduced. Cattle born after 1 April 1995 had to be identified with the new tags (article 8).

5.153 On 22 March 1995 the Select Committee published its report entitled, ‘Identification and Registration of Farm Livestock’. On the issue of establishing a computerised database, the report said:

For diseases with very long incubation periods, such as [BSE], MAFF argued that there would also be little or no benefit in the short-term of a central database. As MAFF pointed out, it would not contain the necessary historical data. For a system to be of value in combating an infection of this type it would need to have been in operation for a number of years prior to the problem occurring. With cases of [BSE] in decline, and no conclusive evidence of horizontal transmission of the disease or of vertical transmission from dam to calf, it seems unlikely that a database would be a worthwhile investment on the grounds of [BSE]. Should a disease with a similar aetiology to [BSE] ever occur in the national herd again, a database established now could of course be a valuable tool. It would, however, mean making a substantial investment now in order to see a return perhaps decades in the future.

Whilst we accept that the justification for a central database for disease purposes under current circumstances may be slim, this takes no account of disease problems that may emerge in the future. The disease tracing problems we have already studied, including those involving foot and mouth disease, sero-positive cattle and [BSE], illustrate both the dynamic nature of animal disease and the unpredictability of the problems the livestock industry must face. These problems have highlighted the way in which MAFF can be taken off-guard and how the systems currently available have struggled to cope with extraordinary events. Professor Wilson also noted the problems of anticipating new diseases and cited [BSE] and Aujeszky’s as
examples of diseases that had developed unexpectedly. . . We believe that MAFF’s ability to cope with future disease problems, should they arise, would be enhanced by the introduction of some form of central database . . .

We find it disturbing that MAFF appears to have operated an ad hoc policy in respect of its own database system. There has been little evidence of a cohesive approach. As a problem has presented itself – such as [BSE] or ear tag allocation – MAFF has established a new database as a one-off solution. Whilst this may have been a reasonable practice in the past, a more co-ordinated approach is now needed. We recommend that MAFF take appropriate steps to merge all the valuable information already contained in its own existing separate cattle-related database systems into one central MAFF database.

. . . It is evident that no single use to which a national database might be put would justify the high costs of its establishment, but the sum of uses, particularly as time goes by, will make the case for a national database increasingly compelling. While preparations for a national database are in train, we favour enhanced co-ordination of existing industry computer databases: the networking solution. . . . 2181

Postscript – developments after March 1996

5.154 Although it falls outside the period of the terms of reference of our Inquiry, we believe that it is helpful briefly to follow through the story of the Government’s consideration of the merits of a computerised cattle-tracking system.

5.155 The Government introduced a cattle passport system in July 1996. Under this system, the movements of all cattle born in or imported to Great Britain have to be recorded throughout its lifetime on an official passport issued for each animal. 2182

5.156 In October 1996 the Animal Health (Disease Control) Division completed a paper entitled ‘Business Case for the Cattle Traceability System’. The paper explained why a cattle-tracing system was now necessary:

The crisis in confidence in the beef market has led to calls for the establishment of a computerised Cattle Traceability System (CTS) in Great Britain. At the Florence Summit in June 1996, the UK and other EU Member States reached agreement on the preconditions for the re-establishment of UK beef and beef product exports. One of these preconditions was that the UK should introduce ‘an effective animal identification and movement recording system with official registration’. 2183

5.157 Under the heading, ‘Should we proceed with a CTS?’, the paper suggested:

Those interviewed in connection with this Business Case believe unanimously that a CTS should be introduced quickly. The first major
benefit would be the resumption of beef exports and the restoration of consumer confidence in the beef market. The CTS is in practice a necessary condition for these, even if this is not explicitly stated in the Florence agreement. A second benefit is fulfilment of EU requirements which are expected to be enacted into EU legislation. There are also a series of other benefits, such as improved disease control, aid to enforcement, easier production of replacement cattle passports, easier export certification etc.

We were able to find some clear, but limited, monetary benefits to Government from improved disease tracing and collection of Agricultural census data. However, on their own, these do not appear to be of sufficient value to justify the project. This explains why, before the difficulties over BSE this year, the CTS has not appeared an attractive proposition. What brings in the benefits is the restoration of the beef market.

... In summary, we have here a high risk project, with the possibility of substantial positive net present value if it is successful, but substantial net present cost if it fails. But in our view, there really is no alternative to the CTS if we want to resume beef exports to a significant extent, and rebuild confidence in the domestic beef market. Thus in our judgement, the project should proceed. 2184

5.158 MAFF obtained Treasury approval to move ahead with the implementation of a computerised database. At this stage it was envisaged that a single private sector provider would be contracted to implement and maintain the database. Detailed planning work began in May 1997, and it was decided not to contract out the proposed service, but to establish it as a distinct operational unit within MAFF. In February 1998 the Government announced that it would meet the costs of setting up the Cattle Traceability System and running it for the first year. 2185

5.159 CTS was established in September 1998, and is operated by the British Cattle Movement Service. As at 22 July 1999, it was estimated that the database would not be fully complete until the end of the year 2000. At that stage, it held records for about 5.5 million cattle born or imported into the UK since 1 July 1996. In July 1999, the Government also announced that it planned to introduce charges for cattle passports, so that the running costs of the CTS were transferred from Government to the industry. 2186

Discussion

5.160 We have explored the history of cattle-tracking in some detail because it is one of the aspects of the response to the emergence of BSE that has given rise to public concern. In July 1990 the Agriculture Select Committee urged MAFF to move towards ‘full control computerisation’ of records so as to facilitate cattle-tracking ‘at an early opportunity’ (see paragraph 5.45). Not until 1996 did MAFF decide to seek Treasury consent to the setting up of a computerised CTS (see

---

2184 M11D tab 16 pp. 26–7
2185 M11 tab 28 p. 70
2186 Veterinary Record, vol. 144, 24 July 1999, p. 91; YB99/07.22/1.1
5.157 Had such a system been in place in March 1996 MAFF would have been much better placed to resist the total ban on the export of beef and beef products that Europe imposed, for it would have been possible to identify with confidence the provenance of the beef in question. It has been suggested by some that there was culpable delay on the part of MAFF in recognising the need for a cattle-tracing system.

5.161 It cannot logically be inferred from the fact that MAFF decided to introduce a cattle-tracing system in 1996 that they should have recognised the need for this when it was recommended by the Select Committee in 1990. The decision to set up a Cattle Traceability System was taken in 1996 primarily for what were, in essence, ‘business’ reasons. Such a system was considered to be a precondition to the re-establishment of UK beef and beef product exports. The embargo on exports had followed the announcement on 20 March 1996 of a probable link between BSE and the cases of a new variant of Creutzfeldt-Jakob Disease (CJD).

5.162 In 1990 and 1991 the possibility that business reasons such as these might justify the costs of setting up a cattle-tracing system was not foreseen either by the Select Committee or by MAFF officials. We do not consider that it should have been foreseen. The business case for a computerised tracing system which was considered at the time identified possible advantages in terms of identification, ancestry recording, milk and beef recording, genetic evaluation and linear assessment. The Wilson Committee had been established by the MMB and the NCBA to see how industry could gain from a computerised tracing system (see paragraphs 5.77–5.80 above). However, in accordance with current policy, MAFF officials took the view that a scheme which would provide benefits for the industry should be paid for by the industry and not by the taxpayer. Mrs Attridge expressed the view in November 1990 that it would be difficult to justify a computerised system on food safety grounds (see paragraph 5.68). This was a reasonable conclusion to reach at that time.

5.163 The recommendation made by the Select Committee in 1990 was made on the basis that a cattle-tracking system was required for disease control purposes – more specifically as ‘a useful adjunct to the control of BSE and other diseases of cattle’ (see paragraph 5.45). The emergence of BSE raised two linked questions in relation to MAFF’s system for tracing animals:

i. was a computerised cattle-tracking system needed to facilitate the handling of BSE? and

ii. was a computerised animal-tracking system needed to enable MAFF to cope with animal diseases that might emerge in the future?

5.164 The Select Committee concluded that these two questions should be answered in the affirmative:

a comprehensive system for identifying and tracking animals is needed . . . We . . . urge MAFF to move towards the full centralised computerisation of the relevant information and not rely on a complicated paper-chase through farmers’ records . . . The logging of the parentage and movements of all cattle, and the retention of that information in a central database, must
be the objective of any scheme MAFF introduces. Every individual bovine animal should be traceable from birth, in much the same way that a car is.

5.165 After considering the Interim Report of the feasibility study, Mr Lowson and his veterinary colleagues formed the contrary view. This led them to conclude that the feasibility study should be taken no further and that, for the time being at least, MAFF should not pursue the setting up of a computerised cattle-tracking system. This conclusion was endorsed by Ministers. Did MAFF officials and Ministers give proper consideration to this matter and was their conclusion one that it was reasonable to reach, having regard to what was known at the time?

5.166 MAFF’s immediate response to the Select Committee’s recommendation was to set up a feasibility study of a cattle-tracking system. In recommending this course to Mr Gummer, Mr Lowson made it plain that the feasibility study should not simply be considering the requirements of handling BSE, but the possibility that a control programme might be found necessary in the future (see paragraph 5.50). As Mr Lowson explained to us in a written statement:

The animal tracking project was part of a wider study of the use of IT in MAFF’s veterinary services. It therefore dealt with issues that went wider than BSE.2187

5.167 We consider that the setting up of a feasibility study was an appropriate response to the Select Committee’s recommendation. It was plainly sensible that this study should look beyond the narrow question of whether a computerised system was needed to cope with the handling of BSE.

5.168 In its response to the Select Committee’s Report, MAFF accepted that a feasibility study was necessary and informed the Select Committee that it was intended to initiate a feasibility study. It was explained to the Select Committee that the Government needed to assess whether defects in the present system would be so serious as to prejudice the effective control of the disease and, if so, whether computerised systems would in practice improve the situation enough to justify the massive investment required. The Select Committee was not told that the feasibility study would be considering aspects of the question that went beyond the demands of BSE (see paragraph 5.76).

5.169 At ATPB’s first meeting Mr Lowson explained that the project had been set up for two reasons: first to consider how best to meet the need to be able to trace the movement, progeny and ancestry of animals which was an essential part of disease control; secondly to consider what would be necessary in order to control BSE in the event that it might be found to be transmissible in the future (see paragraph 5.84).

5.170 The draft feasibility study Interim Report made no express reference to the needs of handling BSE from beginning to end. It looked in general at MAFF’s needs for disease control, identified gaps in the existing system and concluded that this system could not cope adequately with a situation requiring very large numbers of tracings, possibly in a short time frame. The report identified pressure from the public and its representatives to demonstrate a capability for dealing effectively with a ‘son of BSE’ (ie, a chronic disease that requires rapid tracing of very large

2187 S104B Lowson para. 29
numbers of animals). It also identified future pressure from the EU and from the
cattle industry. Having regard to all these considerations the Interim Report
recommended continuing to the next stage of examining more closely the options
that the study had identified for ‘a new, fully automated, central system for animal
identification and movement recording’ (see paragraphs 5.103–5.114).

5.171 In oral evidence to us Mr Lowson emphasised that the views of his IT
colleagues were advanced on a contingency basis. They took the view that an IT
solution was needed if a future outbreak of disease were to require more tracings to
be done than the existing manual system could support. The likelihood of such an
outbreak occurring was essentially a matter for the judgment of AHVG. In oral
evidence Mr Lowson referred us to the following passage in the minute from
Mr Matthews to him on 15 August 1991:

We acknowledge of course that the veterinary/professional judgements are
the key ones here. If AHVG’s judgement is that the risk from emergencies
requiring larger numbers of tracings is so insignificant as not to require any
increase in tracing capacity, then of course ITD would accept this
judgement.2188

5.172 Mr Lowson commented:

I think very properly Mr Matthews was recognising that it was for us and
more particularly veterinary colleagues to identify whether there was a
situation that would require the kind of support that he said the present
system would not give.2189

5.173 Mr Lowson made it plain that he and his veterinary colleagues could not
envisage the disease situation postulated by the feasibility study as necessitating a
computer based cattle-tracking system.2190

5.174 We believe that the reason the Interim Report gave no express consideration
to the needs of handling BSE was that it had become apparent to the APTB that the
setting up of a computerised system was unlikely to be of significant assistance in
dealing with these. As MAFF was to point out to the 1994 Select Committee inquiry
into methods of identifying farm livestock, the system would not contain the
necessary historical data to facilitate tracing of progeny of animals already infected
with BSE. In any event it did not appear that it would be necessary to carry out this
exercise in order to eradicate the disease. This point was accepted by the Select
Committee in 1994 when it conceded that the ‘justification for a control database
for disease purposes under current conditions’ was ‘slim’ (see paragraph 5.153).

5.175 For these reasons we are satisfied that the demands of BSE did not
themselves justify the costs of setting up a computerised cattle-tracking system. The
question remains whether the emergence of BSE had demonstrated the desirability
of putting in place a computerised animal-tracking system, so that if a disease
emerged in the future which required animal-tracing on a large scale, MAFF would
be in a position to deal with it.

2188 YB91/8.15/8.1
2189 T127 p. 166
2190 T127 pp.142, 164, 166
5.176 In 1991, at the time of the Interim Report of the feasibility study, veterinarians and administrators in the AHVG could not foresee a future scenario where the demands of disease control would require a computerised system. In 1995 the Select Committee expressed the belief that ‘MAFF’s ability to cope with future disease problems, should they arise, would be enhanced by the introduction of some form of central database’, but accepted that ‘no simple use to which a national database might be put would justify the high costs of its establishment’. They predicted that ‘the sum of uses, particularly as time goes by, will make the case for a national database increasingly compelling’ (see paragraph 5.153).

5.177 This prediction was correct. Ultimately it was commercial considerations, rather than the demands of disease control, which led MAFF to decide to introduce a Cattle Traceability System.

5.178 One thing that the Interim Report had confirmed was that the costs of a computerised cattle-tracking system were going to be very considerable. Whether there was justification for taking the computerisation project further at that stage depended critically on the likelihood of the emergence in the future of a disease calling for an ability to trace animals on a scale larger than any anticipated in the past. It appears to have been the unanimous view of the veterinarians, including Mr Meldrum, that this was so unlikely that the feasibility study should be taken no further at that stage – a view endorsed by Sir Derek Andrews and the AHVG administrators.

5.179 We have concluded that MAFF officials responded reasonably in concluding that neither the demands of BSE, nor the future demands of disease control, justified the expense of setting up a computerised cattle-tracking system in 1990 and 1991. Those with vision, and we suspect that Mr Matthews was one of them, may have perceived that computerisation was inevitable. If MAFF officials adopted a more conservative approach they cannot be criticised on that account for failing to respond adequately to the emergence of BSE.

5.180 We had, at one stage, a concern about the terms of Mr Lowson’s submission to Ministers of 11 October 1991. We read it as purporting to summarise the key findings of the Interim Report of the feasibility study, whereas it seemed to us that it did not do so, but rather represented conclusions of Mr Lowson. Mr Lowson addressed that concern with care, both in oral evidence and in writing. In particular he explained that his submission was intended only to address the Select Committee’s recommendation that a computerised system be set up to deal with BSE, and made the point that his submission was circulated in draft to his fellow members of the ATPB who, apart from Mr Matthews, appeared content with it. Mr Lowson’s evidence satisfied us that our concern was misplaced.

5.181 Having reached the conclusion that MAFF officials acted reasonably in advising that the Select Committee’s recommendation to set up a computerised cattle-tracing system to deal with BSE and other diseases should not be implemented, it follows that we have no criticism of Ministers for accepting that advice.