Consultation on the simplification of livestock movement rules and holding identifiers in England

March 2010
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Scope of the consultation

**Topic of this consultation:** Proposal to simplify livestock movement rules and holding identifiers to give a clearer picture of when livestock move and which land parcels they are on. Additionally included is a related proposal for sheep and goat movement reporting rules to succeed the current transitional arrangements.

**Scope of this consultation:** This consultation seeks the livestock industry’s views on the broad principles of the proposed package. These will inform the development of detailed proposals that will be consulted on later in the year. It particularly seeks views on the affect the proposals would have on businesses.

**Geographical scope:** England.

**Impact Assessment:** An Impact Assessment has not yet been produced as the proposals are still at the developmental stage. An indication of where any costs may fall is at Annex C; and a preliminary indication of costs for sheep and goat movement reporting is at Annex D. An Impact Assessment will accompany the later consultation on the detailed proposals.

Basic Information

**To:** Representative organisations and individuals in the livestock sector.

**Body/bodies responsible for the consultation:** Defra Livestock Movements and Identification team.

**Duration:** This consultation starts on 31 March 2010 and will end on 30 June 2010.

**Enquiries:** Please e-mail CPHconsultationteam@defra.gsi.gov.uk or phone 020 238 5675.

**How to respond:** Please email your responses to CPHconsultationteam@defra.gsi.gov.uk or post them to Defra CPH Consultation Team, Area 5E Millbank, c/o Nobel House, 17 Smith Square, London SW1P 3JR.

**Additional ways to become involved:** To engage a wider audience we may be able to attend or speak at meetings. Enquires and requests as above.

**After the consultation:** We will draw up detailed proposals and an Impact Assessment. We will publish a summary of responses at http://www.defra.gov.uk/corporate/consult/simplify-livestock-move-id/index.htm

**Compliance with the Code of Practice on Consultation:** This consultation complies with the Code of Practice on Consultation.

Background

**Getting to this stage:** The proposals have been extensively discussed and developed with a range of industry stakeholders and customers.

**Previous engagement:** As above.
Part 1

Simplification of livestock movement rules and holding identifiers in England

Chapter 1: Introduction

1.1 Over time the livestock movements and tracing regime has grown steadily more complex as it has been adapted to take account of Community law and amended to cover deficiencies in traceability and disease control that have come to light as a result of disease outbreaks. The Review of Livestock Movements Controls carried out by Bill Madders (2006) highlighted the need for simplification of the regime itself and also for improvement of the County Parish Holding number (CPH number) system by which farms are identified. The ability of properly observed livestock movement standstills to reduce the size, and therefore the cost, of outbreaks is not under question. This effect was established before the introduction of the regime in 2003 and remains an important factor underpinning our disease prevention and control systems. Standstills balance the legitimate business need to move stock with the need to control the spread of any undetected disease which may be present. This consultation document invites comments on how the regime might be simplified and improved whilst maintaining robust systems for livestock traceability and disease control.

Scope

1.2 The document examines ways in which the livestock movements regime in England can be simplified and holding identification improved so as to give a clearer picture of when and where livestock are moved and located. The need for the standstill itself is not under review and standstills will continue to underpin the livestock movements regime. However the extended use of Isolation Facilities may avoid the standstill applying to the whole holding. Any changes to the policy on pre-movement testing for bovine TB will be consulted on separately. A proposal for sheep and goat movement reporting rules to succeed the transitional arrangements agreed from 1 January 2010 is additionally included. At this stage the livestock
industry’s views are being taken on the broad principles of the proposed package. Once these views have been considered a further consultation will be issued later this year with detailed proposals and an associated Impact Assessment.

Chapter 2: Current requirements

Background

2.1 A holding is identified by a County Parish Holding (CPH) number. When livestock move between holdings their keepers must report the movement and no livestock may move off the receiving holding until the standstill period expires - 20 days for pigs or 6 days for cattle, sheep and goats.

2.2 Standstills slowdown the spread of undisclosed disease because keeping livestock in one place for six days or more increases the chance of detecting the presence of animal disease. In recognition of the fact that standstill periods can cause difficulties, livestock can be placed in approved Isolation Facilities in very specific circumstances, for example the return of breeding rams or bulls from market, for the duration of the standstill period without them putting the entire holding under standstill.

2.3 Some cattle keepers who regularly move cattle between two holdings have been allowed to “link” administratively the holdings within the Cattle Tracing System (CTS). Movements of cattle between linked holdings only have to be recorded in the on-farm Register and do not need to be reported centrally to the CTS Database. However CTS Links do not remove a keeper’s legal obligation to comply with other aspects of movement and disease controls such as standstills or pre-movement tests for bovine TB.

2.4 CTS linked holdings only affect cattle movement reporting, whilst ‘Sole Occupancy Authorities’ (SOAs) were introduced to help keepers of cattle, sheep, goats and pigs to manage standstills arising from movements within their businesses. Movement of livestock from premises outside the SOA onto any premises in the SOA puts the entire group under standstill but movements between the different premises in the SOA are still allowed. These movements have to be reported either to the
CTS for cattle or to Local Authorities for sheep, goats and pigs. Currently movements of cattle between premises in SOAs are exempt from the requirement to pre-movement test for bovine TB.

Why do the current arrangements need to be changed?

2.5 Sir Ian Anderson’s reviews of the handling of the Foot and Mouth Disease outbreaks in 2001 and 2007 highlighted the need for further work on collection of livestock data. The need to improve the CPH system of location identifiers to give a clearer and more accurate understanding of the actual physical location of stock was particularly singled out. Against this background the Report of the Review of Livestock Movement Controls (delivered by Bill Madders in 2006) addressed the risks managed by the controls, the benefits of the controls, the burdens created by the controls and the way they have influenced farmer behaviour and compliance. The report concluded that significant simplification was possible.

2.6 In addition to the work of Anderson and Madders, livestock farmers and their representatives tell us that the current system is too complex and is not well understood by many. Apart from any deliberate abuse, uncertainty as to what reporting requirements are applicable in different circumstances can result in failure to report livestock movements and/or observe standstills. There is real uncertainty about the operation of CTS links and SOAs. This is particularly troubling as these measures can allow livestock to move over significant distances. Even when movements are reported the associations between the various holdings can result in uncertainty as to where livestock are actually being kept. This undermines disease prevention and control.

Though farmers generally find Isolation Facilities helpful they have made it clear that the complexity of when and how they can be used is confusing.

Chapter 3: Proposals

Overview
3.1 We propose a package of measures that will simplify the complex livestock movement rules and significantly improve our knowledge of where livestock are located. The package includes:

- robust allocation of CPH numbers, including for temporary grazing - normally there will be a single CPH for all land within 10 miles radius of the place of business.

- abolition of CTS Links and SOAs - replaced by an arrangement to allow temporarily held land within 10 miles radius of the place of business to be associated with the main holding; and revised arrangements for permanent or temporary land beyond 10 miles.

- Revision to existing rules for the use of Isolation Facilities as an alternative to standstill of the whole holding.

3.2 These measures do not, however, deal explicitly with existing disease control requirements for Bovine TB. Any consequential changes thought necessary to that regime, will be dealt with separately in the context of the work of the Bovine TB Eradication Group for England and the ongoing review of the current Pre-Movement Testing Regime.

Benefits

3.3 The proposals will lead to:

- simplified movement reporting and standstill regimes across the main livestock species (cattle, pigs, sheep and goats) so that keepers can understand and comply with requirements more easily.

- keepers being allowed to move livestock between land parcels (owned or rented) within a 10 miles radius of their main site without recording in the on-farm Holding Register, reporting the movement or serving a standstill.

- more flexibility for those keepers wishing to make use of Isolation Facilities to avoid whole farm standstills and thus being able to move animals which would otherwise have been placed under standstill by incoming stock.
• enhanced ability to trace livestock rapidly in the event of a disease outbreak and fulfil Community law.

• More accurate targeting of inspections/testing and setting of disease control zones which will help to reduce the impact on farmers in the event of disease outbreaks such as FMD.

Costs

3.4 Some businesses may face some additional costs, some may see some savings and some may not be affected at all in the short term. An indication of where the costs may fall is included at Annex C (and for sheep keepers additional information is in Part 2, paragraphs 1.3 to 1.5 and Annex D.) This, along with responses to the consultation exercise, will contribute to the Impact Assessment that will accompany the consultation on detailed proposals planned for later this year.

3.5 For those cattle holdings currently with CTS Links more than 10 miles radius from the place of business there will be increased movement reporting requirements when links are withdrawn; for those with CTS Links within 10 miles there will be some costs in terms of time in ‘associating’ temporary land with the main holding (where keepers choose to make such an association) but a subsequent reduction in moves that need to be recorded in the on-farm Holding Register. For those cattle, sheep and pig keepers with SOAs there will be costs associated with serving standstill following the removal of SOAs. For sheep keepers there will be savings in relation to a reduction in movements to be reported and recorded reflecting the move from a 5 mile to 10 mile radius.

Q1. Views are invited on the impact of the proposals on individual businesses/sectors.

Specific proposals

CPH number allocation

3.6 Currently all fields and buildings making up a holding should be within a 10 mile radius of the main site for cattle and pigs; and 5 miles for sheep and goats. The
location of the CPH is recorded as the place of business address. However, the
distance criterion has not been applied consistently giving rise to some holdings
which are spread out over larger areas. This is not acceptable for disease control
and tracing purposes. Keepers using land on a short term basis, eg where the
permanent CPH number is not available to a keeper renting seasonal grazing, are
generally given a temporary CPH. When livestock move to and from land with these
temporary CPH numbers the movement must generally be reported unless, in the
case of cattle, a CTS link is in place.

3.7 We propose to make a distinction (for all species) between land/ buildings up
to and including a 10 mile radius - as the crow flies - of the main holding; and
land/buildings over a 10 mile radius from the main holding. Ten miles is a
compromise between the need to allow farmers to carry out their business and the
need to have effective disease control measures.

3.8 The proposals, including the associated movement reporting and standstill
requirements (either whole farm or served in an Isolation Facility), are:

(i) Land and buildings within 10 mile radius of main holding
- All land parcels (including any buildings) under the same management and
  control will normally be included in the same CPH number.
- Any land parcels contiguous to land within the 10 mile distance can be part of
  the CPH providing it is under the same management and control; and
  livestock cannot mix freely with other livestock from other holdings.
- Short term rented land and buildings, eg seasonal grazing, can be temporarily
  “associated” to the keeper’s permanent holding. These associations would
  lapse at the end of 12 months (or the tenancy end date if less that 12 months)
  after which they would have to be renewed.
- All moves between holdings identified with different CPH numbers must be
  recorded, reported and standstills served.
- Movements within the holding, including to and from the rented land
  associated with the holding, will not have to be reported or recorded in the
  farm register.
- When a holding is put under a standstill, the standstill applies to the whole of the holding, including any associated land.
- If, in the case of short-term rented land, the keeper opts to report moves to/from this rented land using the permanent CPH for that land the whole of the permanent CPH for that land must serve a standstill.

**CPH allocation proposal**

![Diagram showing CPH allocation]

*CPH 1 a single business all permanently farmed*

*Additional land bisected by the 10 miles radius and contiguous land = in CPH 1*

*Separated Land = new CPH*
(ii) **Land and buildings beyond 10 mile radius of the main holding**

- Land parcels (including any buildings), even where they are under the same management and control as the main holding, will need a separate CPH number.

- Short term rented land and buildings, e.g., land used for seasonal grazing, can be allocated a temporary time-limited CPH number. Details of the land and the land owner will be required.

- All moves between holdings with different CPH numbers, including temporary ones, must be recorded, reported, and standstills served.

- If, in the case of short-term rented land, the keeper opts to report moves to/from this rented land using the permanent CPH number for that land, the whole of the permanent CPH number for that land must serve a standstill.

**Common Land**

3.9 We propose that each Common will continue to have a single CPH number and that this CPH number will be associated with the CPH numbers of the farms
having rights to that common. The rules on livestock movement to and from Commons will be clarified. In simple terms the proposals are:

- no livestock may go directly onto the Common without serving a standstill (either whole farm or within an Isolation Facility) on the main holding.
- livestock going from the main holding to the Common will not trigger a standstill on the Common and movements from the Common to the main holding and back to the Common will not trigger a standstill on either.
- Reporting of moves between the main holding and its associated Common will not be required but should be recorded in the on-farm register.

Q2. Views are invited on the use of ‘place of business’ as the point for measuring the 10 mile radius.

Q3. Views are invited on the proposals for:

(a) the allocation of CPH numbers for land and buildings up to and including a 10 mile radius of the main holding

(b) the allocation of CPH numbers for land and buildings beyond a 10 mile radius of the main holding

(c) Commons

Q4. Views are specifically invited on how long any rented land should be associated with the main holding, or temporary CPHs remain valid, before a review/renewal is needed

(a) 6 months

(b) 1 year

(c) Other, please specify
CTS Links and Sole Occupancy Authorities (SOAs)

3.10 We propose to abolish all CTS links and SOAs.

3.11 Keepers will want to take this opportunity to consider how this proposal will affect their business, particularly in the light of our proposals to allow keepers to combine land parcels within 10 miles radius of the main holding into a single CPH and the associated proposal to extend the use of Isolation Facilities (see Section below).

3.12 Keepers may wish to consider the current structure of their business and plan for any changes.

Q5 Views are invited on how the abolition of (a) CTS Links and (b) SOAs will affect your business/sector, taking into account the other elements of the package.

Q6 Views are invited on the timing of the abolition of (a) CTS Links and (b) SOAs.

Isolation Facilities

3.13 Rather than limiting the use of Isolation facilities to very specific circumstances (as contained in the Disease Control (England) Order 2003) we propose to extend the use of Isolation Facilities for those businesses where serving standstills would make the business untenable, but only in cases where a robust disease management regime involving Isolation Facilities can be demonstrated. Annex B sets out some broad principles on the possible rules and criteria which could govern the future operation of Isolation Facilities.

3.14 However, experience in Scotland, where standstill periods are longer, has shown that the great majority of farmers do not need to maintain Isolation Facilities in order to run their businesses in compliance with standstill rules. To maintain an unnecessary Isolation Facility would make little sense given the costs associated with approval, maintenance and on-going compliance.
3.15 The application/approval process could include the following elements:

- Farmers to draw up an application for an Isolation Facility for approval by Animal Health. Farmers may wish to involve their own Veterinarian in this process.

- The application to be submitted to Animal Health, along with an application fee.

- Isolation Facilities to be inspected by Animal Health prior to approval. It is likely that the inspections will be charged for and the cost included in the application fee.

- Approval of applications to run for one year after which re-application will be necessary.

- Existing approved Isolation Facilities to remain valid for a year during which time farmers would need to re-apply, however in the meantime Isolation Facilities must meet the revised criteria and any compliance visits will be carried out on that basis.

3.16 Application fees might be in the region of £250, including processing of the application and pre-approval inspections by Animal Health staff. This represents full cost recovery in accordance with Treasury guidance on provision of services.

3.17 The proposals above draw on the current approvals process for Isolation Facilities. Alternatively it might be possible to incorporate the design and approvals process into Farm Assurance or other similar schemes.

Q7. Views are invited on:

(a) the proposals for extending the use of Isolation Facilities

(b) the application process

(c) how they might be operated.

Q8. In what specific circumstances would Isolation Facilities as proposed be useful to you/livestock businesses?
Part 2

Sheep and Goat movement reporting

1.1 Transitional reporting arrangements introduced on 1 January 2010 require:

- no reporting or recording of moves within the same CPH within 5 miles of the main site;
- batch reporting and recording of moves to a different CPH irrespective of distance where keepership of the animal does not change;
- individual reporting and recording of moves to a different CPH - regardless of any distance criteria - where keepership of the moved animal changes.

1.2 We propose to introduce permanent sheep and goat movement reporting arrangements at the same time as the wider proposals, so that the requirement to report moves is standardised for all livestock. The specific arrangements would take account of the recording provisions (to be introduced in phases – see below) contained in Council Regulation 21/2004 and would be:

- no reporting or recording of moves within the same CPH or associated temporary land/buildings, i.e. within a 10 mile radius of the main site (see proposals above on CPH number allocation), where keepership of the moved animal doesn’t change.
- Individual reporting of moves to different CPHs – regardless of distance for animals born after 31 December 2009 from [the date the new rules take effect] and from 31 December 2011 for animals born before 31 December 2009.
- Individual recording (in holding registers) of moves to different CPHs – regardless of distance for animals born after 31 December 2009. Animals born before this date do not need to be recorded individually at all.
Costs

1.3 Annex D provides a preliminary indication of costs and movements. It does not consider movements out of a business (ie change of ownership) because all scenarios would have the same impact (ie all individually reported and recorded) nor does it reflect the transition to individual recording. The assessment assumes that 86% of all movements are within 10 miles of the main holding.

1.4 The total number of movements that need to be recorded and reported compared to the current transitional arrangements is reduced by around 85% and represents a significant simplification of the current arrangements. There is a slight increase in the number of movements which need to be individually recorded and reported, but this is far outweighed by the overall reduction in movements. (Table 1)

1.5 Our preliminary estimate, on the assumption that some keepers purchase equipment based on the scale and operation of the business, is that there will be around a £400k (20%) annual reduction in the costs of operating the proposed arrangements as compared to the current transitional arrangements. (Table 2)

Q9 Views are invited on the proposals for permanent sheep and goat movement reporting arrangements.
Annex A – Summary of Questions

1. Views are invited on the impact of the proposals on individual businesses/sectors.

2. Views are invited on the use of ‘place of business’ as the point for measuring the 10 miles radius.

3. Views are invited on the proposals for:

   (a) the allocation of CPH numbers for land and buildings up to and including a 10 mile radius of the main holding

   (b) the allocation of CPH numbers for land and buildings beyond a 10 mile radius of the main holding

   (c) Commons

4. Views are specifically invited on how long any rented land should be associated with the main holding, or temporary CPHs remain valid, before a review/renewal is needed:

   (a) 6 months

   (b) 1 year

   (c) Other, please specify.

5. Views are invited on how the abolition of (a) CTS Links and (b) SOAs will affect your business/sector, taking into account the other elements of the package.

6. Views are invited on the timing of the abolition of (a) CTS Links and (b) SOAs.

7. Views are invited on:

   (a) the proposals for extending the use of Isolation Facilities

   (b) the application process

   (c) how they might be operated.
8. In what specific circumstances would Isolation Facilities as proposed be useful to you/livestock businesses?

9. Views are invited on the proposals for permanent sheep and goat movement reporting arrangements.
Annex B – Suggested requirements for operation of Isolation Facilities

1. Separating incoming stock from the main herd or flock until their health status is ascertained is good practice however where animals are isolated for standstill mitigation purposes then the bio-security must be consistently applied to the highest standards.

2. Buildings, fields, separate land parcels or whole farm units separate from the main holding may be suitable for operation as Isolation Facilities. It is anticipated that most applicants will only need one facility however application for multiple facilities would be considered in exceptional cases.

3. Separation between stock must be both adequate and suitable. The animals kept separate must be isolated from other animals on the same and on adjoining premises for example;
   - by a natural barrier such as empty or arable fields, woods, streams or double fencing which provides a barrier of at least 3m width to prevent nose to nose contact.
   - Fields used must be physically separate from buildings which house livestock
   - Public access through such fields would be undesirable and may make them unacceptable where a footpath traverses other fields used by livestock.
   - Buildings used for this purpose must be physically separate from those housing other stock and there may not be a shared air-space.

4. The relative location of the isolation facility and other livestock areas must be such as to encourage and enable staff to adopt good bio security practises.
5. Any fields or buildings used must be designed and operated to minimise the risk of disease spread for example;

- any discharges, effluent or unused feed must not come into contact with other livestock during the isolation period,
- separate feeding facilities and water troughs must be available
- fields must be fenced so as to be proofed against the escape of the animals.
- Animals being put into isolation should go directly into them without using common yards or access ways i.e. off loaded directly into the building or field.

6. Isolation facilities must be managed in ways which minimise the risk of disease spread for example;

- equipment and staff clothing must be thoroughly cleaned and disinfected to prevent the transfer of organic material and therefore potentially, notifiable and other diseases between the isolation unit and other parts of the premises. A history of persistent, wilful or serious non compliance would mean that applications would fail on this condition.
- Farm machinery which comes into contact with animals or organic matter such as scraper tractors or feed wagons may not be shared between the isolation facility and the main unit. It is unlikely to be practical to adequately clean and disinfect such equipment between uses.

7. Isolated livestock must be inspected at least daily for signs of disease.
8. Milking animals may be put into isolation however they may not use the same milking parlour as other non-isolated stock. Milking may be carried out using portable milking units or similar however if the milk is to be sold for human consumption the place and method of milking must meet the requirements set out in the Food Hygiene (England / Wales) Regulations 2006.

9. The movement of animals onto a holding and into Isolation Facilities must be reported normally and recorded in the on-farm Holding Register with a note ‘in Isolation’. AMLS and CTS will have the ability to capture the use of Isolation Facilities by way of a ‘tick box’ on the movement input forms/screens. At the end of the standstill period a further note would be made in the Holding Register to show the move out of Isolation but this would not need to be reported centrally.

10. Where animals are individually identified their identities should be recorded in the farm record. Where this is not the case then the flock or herd mark and number of animals from each flock/herd must be recorded as per movement reporting requirements.

11. Animals which enter isolation must serve out the whole of the standstill period in that facility. Animals may only be moved between Isolation Facilities on a holding under licence from Animal Health. The standstill period is measured from the date of entry of the last animal.

12. Breeding goats of either gender may leave the isolation facility to return to the premises where they had previously bred during the 6 day isolation period on their home premises.

13. Pigs may not share Isolation Facilities with other species.
## Annex C – Indication of where the costs may fall

<table>
<thead>
<tr>
<th>Proposal</th>
<th>Impact on Government</th>
<th>Impact on Industry</th>
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<tbody>
<tr>
<td><strong>Changes to CPH Allocation:</strong> RLE 1 (Request for changes to the Rural Land Register and for the Transfer of Entitlements) Forms</td>
<td><strong>Transition cost:</strong> RLE1 forms are used by livestock keepers to notify the Rural Payments Agency (RPA) of changes in the make-up of their holding. The changes proposed are likely to trigger an increase in volumes of RLE1 land changes submitted to the RPA. As a result, the government will incur additional costs. These transition cost will be largely driven by three factors:</td>
<td><strong>Transition cost:</strong> The changes proposed are expected to trigger an increase in volumes of RLE 1 forms submitted to the RPA. This will be where livestock keepers choose to make changes to the make-up of their holding following e.g. extension of the 10 mile rule across species; removal of Sole Occupancy Authorities (SOAs); introduction of Extended Use Isolation Facilities; etc.</td>
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<td>- The numbers of livestock keepers seeking to make changes to their current CPH make-up, for example, to rationalise the number of CPHs they have within a 10 mile radius, in order to minimise movement reporting burdens. - The number of land parcels which have to be linked to different CPH numbers. - Additional validation activity against business rules to ensure changes submitted via the RLE 1 process comply with e.g. the 10 mile radius.</td>
<td>Costs associated with this activity essentially relate to the amount of time it takes livestock keepers to gather relevant information, fill out the RLE1 forms, and submit them to the RPA. The actual amount of time taken will be very variable, depending on changes to be made.</td>
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<td><strong>Ongoing cost:</strong> Allocating temporary CPH numbers following implementation of the proposals will result in a number of additional costs to government. These costs will be driven by: - The numbers of applications for temporary CPH numbers made annually. - Time taken to gather relevant information from keepers requesting temporary CPH numbers. More information will be collected under the new regime than is collected currently;</td>
<td><strong>Ongoing cost</strong> An increase in volumes of temporary CPHs requested by industry, as well as the amount of information livestock keepers will be required to supply in order to secure a temporary CPH will result in additional costs to industry. These costs will relate to the amount of time it takes keepers to gather the appropriate information, and discuss their temporary CPH needs with Animal Health. It is anticipated that this process will be lengthier than is currently the case.</td>
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<td><strong>Changes to CPH Allocation:</strong> Temporary CPH numbers (including ‘associating’ temporary land)</td>
<td><strong>Ongoing cost</strong> Allocating temporary CPH numbers allocated on an annual basis. Demand for new temporary CPHs will largely be driven by the removal of CTS links. Additional demand may result from the 10 mile business rule for sheep, and removal of SOAs.</td>
<td><strong>Ongoing cost</strong> In some instances, additional temporary CPH numbers will result in increases in the number of inspections which take place, in particular where...</td>
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- Time to update other systems with temporary CPH data.

**Ongoing cost:**
In the majority of cases, temporary CPHs will not be considered to be separate holdings (i.e. where the temporary CPH is associated with an existing permanent CPH number). However, in some cases, such as where the temporary CPH is located more than 10 miles away from the owner keeper’s main CPH address, the new temporary CPH will effectively be treated as a separate holding, with associated inspection requirements.

Costs to government will be driven by volumes of new inspections that need to be conducted annually.

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| Phasing out Sole Occupancy Authorities (SOAs) | **Annual cost saving:** Government costs of allocating SOAs will no longer be incurred. Currently, government (Animal Health) incur costs of processing applications, as well as local veterinary time to approve the proposed SOA grouping. | **Ongoing cost:** Moves between premises previously contained within a SOA will be eligible for standstill. Currently, such moves are exempt from standstill requirements.

Where SOAs are currently in place, it can be assumed that standstill burdens that would otherwise be incurred by the SOA owner are reduced. Removal of SOAs will essentially see such keepers incur the full annual cost of standstill.

Annual costs associated with serving 6 day standstill have been estimated at £70\(^1\) per farm.

**Ongoing cost:**
SOAs currently provide keepers with an exemption from pre-movement testing cattle for intra-SOA moves. In removing SOAs, this exemption will no longer be available to livestock keepers.

However, with around 90% of all SOA premises potentially falling within the distance threshold for a single CPH, assuming keepers opt to classify their holding as a single CPH (as per CPH allocation proposals), only around 10% of intra-SOA moves might be expected.

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| **Phasing out Cattle Tracing System (CTS) links** | **Ongoing cost:** Removal of CTS links is expected to trigger increases in the number of cattle movements reported to CTS annually. Costs will be driven by the volumes of additional moves to be processed. For every additional 1 million cattle movement reports received by CTS, 2.2 members of staff are required to administer reports with anomalies (where the movement history of an animal is inaccurate), or those falling in to suspense (erroneous data entered on movement report).

Current estimates indicate that in England, an additional 900,000 (approximately) cattle movements may be reported annually, following implementation of the proposals.

**Annual cost saving:** The British Cattle Movements Service no longer needs staff to issue links in England. As a result, staff currently issuing links in England could be deployed elsewhere, following implementation of the proposals. |
| **Extended Use of Isolation Facilities (EUIFs)** | **The costs of approving Extended Use Isolation facilities, including pre-approval inspections, will need to be covered by those keepers who wish to have them. The costs of in-year compliance inspections and enforcement will be met by Government.** |
| **Additional Costs per keeper of establishing EUIF:** Total costs to industry will essentially be driven by uptake of EUIFs. Applicants are likely to incur costs in a number of areas: **Set-up costs**
- Time taken to read and understand guidance material, and fill in application.
- Costs of setting up an isolation facility will be very variable. For example, in some cases, set up might include double fencing etc, but in others, set up cost may be marginal.

**Approval costs:**
- All applicants will be required to have pre approval inspection. It is estimated that this will take approximately 1 hour of keeper’s time. Keepers will also be charged an application fee of approximately £250, to cover costs of processing application and of the pre approval }
inspection.
- Further costs are likely to be incurred where applicants choose to involve their private veterinarian in drawing up an application.

**Running costs**
- Additional keeper time will be required when Isolation Facilities are inspected. Some units will be inspected in year for compliance.
- Operating costs: variable, depending on frequency of use. Costs could include additional disinfectant, additional management time etc. No cost estimated at this stage

**Benefits:**
- Keepers utilising EUIFs should be able to minimise the burdens standstills would otherwise place on them. Standstills estimated at costing c. £70 per farm per year. Use of UIF may enable keepers to reduce standstill burdens.
- Embedding isolation in farm practice more widely may also deliver disease protection benefits.
Annex D - Preliminary indication of costs and movements for proposal on sheep and goat movement reporting

(Detailed assumptions available on request)

Table 1 - Summary of moves (calendar year 2009) to be recorded by option

<table>
<thead>
<tr>
<th>Description</th>
<th>Option 1 EU System</th>
<th>Option 2 Transitional arrangements</th>
<th>Option 3 Proposed simplified arrangements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Movements - read and record on individual basis</td>
<td>1,082,000</td>
<td>56,805</td>
<td>151,480</td>
</tr>
<tr>
<td>Movements - read and record on batch basis</td>
<td>678,000</td>
<td>1,703,195</td>
<td>94,920</td>
</tr>
<tr>
<td>Movements - read and record on mixed batch basis</td>
<td>2,310,000</td>
<td>2,310,000</td>
<td>323,400</td>
</tr>
<tr>
<td></td>
<td>4,070,000</td>
<td>4,070,000</td>
<td>569,800</td>
</tr>
</tbody>
</table>

Table 2 - Summary of costs for sheep movements (assuming some keepers buy equipment)

<table>
<thead>
<tr>
<th>Description</th>
<th>Option 1 EU System</th>
<th>Option 2 Transitional arrangements</th>
<th>Option 3 Proposed simplified arrangements</th>
</tr>
</thead>
<tbody>
<tr>
<td>One off - Equipment costs</td>
<td>£28,120,950</td>
<td>£4,941,090</td>
<td>£3,504,600</td>
</tr>
<tr>
<td>Number of keepers buying equipment</td>
<td>28,405</td>
<td>4,991</td>
<td>3,540</td>
</tr>
<tr>
<td>Reading tag costs</td>
<td>£61,213</td>
<td>£3,788</td>
<td>£16,475</td>
</tr>
<tr>
<td>Recoding holding register costs</td>
<td>£3,725</td>
<td>£33,575</td>
<td>£21,663</td>
</tr>
<tr>
<td>Completing movement document costs</td>
<td>£64,887</td>
<td>£65,099</td>
<td>£17,703</td>
</tr>
<tr>
<td>Total Admin Costs</td>
<td>£129,824</td>
<td>£102,462</td>
<td>£55,841</td>
</tr>
<tr>
<td>Annual cost of equipment</td>
<td>£6,861,512</td>
<td>£1,205,626</td>
<td>£855,122</td>
</tr>
<tr>
<td>Maintenance cost of equipment</td>
<td>£2,812,095</td>
<td>£494,109</td>
<td>£350,460</td>
</tr>
<tr>
<td>Total annual equipment costs</td>
<td>£9,673,607</td>
<td>£1,699,735</td>
<td>£1,205,582</td>
</tr>
<tr>
<td>Annual cost - linking CPH numbers</td>
<td>£0</td>
<td>£0</td>
<td>£150,000</td>
</tr>
<tr>
<td>Total annual costs per options</td>
<td>£9,803,431</td>
<td>£1,802,196</td>
<td>£1,411,423</td>
</tr>
</tbody>
</table>
Annex E
Department for Environment, Food and Rural Affairs
March 2010
Simplification of livestock movement rules and holding identifiers in England

List of Consultees
ADASs Arthur Rickwood Sheep Unit
Animal Transportation Association
Association Of Independent Meat Suppliers (AIMS)
Association Of Meat Inspectors
Association Of Port Health Authorities
Association Of Show & Agricultural Organisations
Association Of Veterinarians In Industry (AVI)
Assured British Meats
Assured British Pigs
Assured Food Standards Ltd
Ayrshire Cattle Society Of GB & Ireland
Badger Face Welsh Mountain Sheep Society
Balwen Welsh Mountain Sheep Society
Beef Shorthorn Cattle Society
Belted Galloway Cattle Society
Beltex Sheep Society
Blackface Sheep Sire Reference Scheme
Black Welsh Mountain Sheep Breeders Association
Blue Albion Cattle Society
Bluefaced Leicester Sheep Breeders Association
Blue Texel Sheep Society
BPEX Ltd (Formerly Known As British Pig Executive)
Brecknock Hill Cheviot Sheep Society
British Alliance Sheep Contractors
British Association Of Sheep Exporters
British Bazadaise Cattle Society
British Belgian Blue Cattle Society
British Berrichon Du Cher Sheep Society
British Bleu Du Maine Sheep Society
British Cattle Breeders’ Club
British Cattle Veterinary Association
British Charolais Cattle Society
British Charolais Sheep Society Ltd.
British Deer Farmers Association
British Friesland Sheep Society
British Gelbvieh Cattle Society
British Goat Society
British Gotland Sheep Society
British Icelandic Sheep Breeders Group
British Inra 401 Sheep Society
British Limousin Cattle Society
British Meat Processors Association (BMPA)
British Milk Sheep Association
British Milk Sheep Society
British Parthenais Cattle Society
British Pig Association (BPA)
British Polwarth Sheep Breeders Association
British Rouge De L’ouest Sheep Society
British Rouge Sheep Society
British Roussin Sheep Society
British Sheep Association
British Sheep Dairying Association
British Sheep Development Association
British Simmental Cattle Society Ltd
British Texel Sheep Society
British Vendeen Sheep Society
British Veterinary Association (BVA)
British White Cattle Society
Brown Swiss Cattle Society
Cambridge Sheep Society
Castlemilk Moorit Sheep Society
Cattle Tech Ltd
Cattles PLC
Charmoise Hill Sheep Society
Chianina Cattle Society
Cotentin Sheep Society Ltd
Cotswold Sheep Society
Country Land & Business Association (CLA)
Countryside Alliance
Dairy UK
Dalesbred Sheep Breeders Association
Darlington Cattle
Dartington Cattle Breeding Centre
Derbyshire Gritstone Sheep Breed Society
Devon and Cornwall Longwool Flockbook Association
Devon Cattle Breeders Society
Devon Closewool Sheep Breeders Society
Dexter Cattle Society
Dorper Sheep Society Ltd
Dorest Horn & Poll Dorest Sheep Breeders Association
Dorset Down Sheep Breeders Association
English Beef & Lamb Executive (EBLEX)
English Guernsey Cattle Society
Exmoor Horn Sheep Breeders Society
Exmoor Horn Sheep Society
Farm Assured British Beef and Lamb
Farmers Guardian
Farmers Weekly
Galloway Cattle Society
Gascon Cattle Society
Gloucester Cattle Society
Goat Veterinary Society
Government Office For London (GOL)
Government Office For The East Of England
Government Office For The North East (GONE)
Government Office For The North West (GONW)
Government Office For The South East (GOSE)
Government Office For The South West (GOSW)
Government Office For The West Midlands (GOWM)
Government Office For Yorkshire And The Humber (GOYH)
Grey Face Dartmoor Sheep Breeders Association
Hampshire Down Sheep Breeders Society
Hebridean Sheep Society
Herdwick Sheep Breeders Association
Hereford Cattle Society
Highland Cattle Society
Holstein Uk Independent Cattle Breed Society
Irish Moiled Cattle Society
Jacob Sheep Society
Jersey Cattle Society Of The United Kingdom (JCS)
Local Authorities Coordinators of Regulatory Services (LACORS)
Leek Cattle Market
Leicester Longwool Sheep Breeders Association
Lincoln Longwool Sheep breeders Association
Lincoln Red Cattle Society
Livestock Auctioneers Association
Longhorn Cattle Society
Lonk Sheep Breeders Association
Luing Cattle Society
Manx Loghtan Sheep Breeders Group
Masham Sheep Breeders Association
Meatlin Breed Society
Meuse Rhine Issel Cattle Society
Murray Grey Beef Cattle Society
National Beef Association
National Cattle Association Dairy
National Farmers' Union (NFU)
National Federation Of Young Farmers Clubs
National Pig Association
National Sheep Association
New Forest Pony Breeding & Cattle Society
Norfolk Horn Breeders Group
North Country Cheviot Sheep Society
North Of England Mule Sheep Association
Oxford Down Sheep Breeders Association
Pig Veterinary Society (PVS)
Portland Sheep Breeders Group
Rare Breeds Survival Trust
Red Poll Cattle Society
Road Haulage Society
Romagnola Cattle Society
Romney Sheep Breeders Society
Rough Fell Sheep Breeders Association
Roussin Sheep Society
Royal College Of Veterinary Surgeons
Royal Veterinary College
Salers Cattle Society
Sheep Trust
Sheep Vet Society 3
Sheep Veterinary Services
Sheep Veterinary Society
Sheepdrove Organic Farm
Shetland Cattle Herd Book Society
Shetland Sheep Society
Shropshire Sheep Breeders' Association
Society Of Border Leicester Sheep Breeders
Southdown Sheep Society
Suffolk Sheep Society
Suffolk Sheep Society
Sussex Cattle Society
Swaledale Sheep Breeders Association
Teeswater Sheep Breeders Association Ltd
Tenant Farmers Association
Texel Sheep Society
United Kingdom Electronic Identification Association (UKEIDA)
Wensleydale Longwool Sheep Breeders Association
West Country Suffolk Sheep Association
White Face Dartmoor Sheep Breeders Association
White Park Cattle Society
Wiltshire Horn Sheep Society
Women's Food And Farming Union (WFA)
Zwartbles Sheep Association

Commons

Dartmoor Commoners' Council
Court Leet For The Manor Of Fyling
Blawith & Subberthwaite Commoners’ Association
Petersham Common Conservators
Ingleborough Commoners' Association Ltd
Federation Of Yorkshire Commons & Moorland Graziers
Caldbeck Commoners Association
Towyn Trewan Conservators
Malvern Hills Conservators
Manor Of Fyling Court Leet
Ulpha Commoners' Association
Cleeve Hill Commons Board Of Conservators
Banstead Common Conservators
Scotl Head & District Common Rightholders' Association
Tunbridge Wells Commons Conservators
Federation Of Yorkshire Commons & Moorland Graziers
Mary Tavy Commoners’ Association
Wimbledon & Putney Commons Conservators
Nettlebed & District Commons Conservators
Mitcham Common Conservators
Bramshott Commoners' Society
Banstead Commons Conservators
The Moorland Association
International Centre For The Uplands