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Consultation Document

Consultation on holding identifiers and associated livestock movements

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Overview

The County Parish Holding (CPH) reference number underpins a number of control systems as it is used to identify farmed holdings. Its primary use is to identify and trace the location of livestock, as required by European Regulation, for cattle, sheep and goats and pigs.

The CPH identifier is the base on which livestock movement reporting regimes provide a system capable of tracing livestock through every location along the supply chain.

The Deputy Minister for Farming and Food is committed to proceed with the introduction of efficiencies and improvements to the CPH system in Wales.

The decision to rationalise the CPH system involves the removal of Sole Occupancy Authorities (SOAs) and Cattle Tracing System (CTS) links along with the implementation of a 10 mile rule which will allow livestock keepers to improve the efficiency of their business by giving them the opportunity to control all land parcels under their management within 10 miles of the primary production location.

How to respond

The closing date for responses to this consultation is 19/01/2016.

Please send your comments and responses to the questions posed at page 13 to the Welsh Government using the contact details list below.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Please telephone or email us to request your copy. It will take approximately two weeks for your copy to be prepared and to arrive with you.

Contact details

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Data protection

How the views and information you give us will be used

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

1.0 Introduction

European Regulations require Member States to have in place an effective method of identifying agricultural blocks of land commonly called holdings to trace where livestock are, have been and are moving to.

The County Parish Holding (CPH) reference, introduced during the 1950's, is a key control mechanism which underpins the identification of farmed livestock (cattle, pigs, sheep and goats). The CPH identifier is the base on which livestock movement reporting regimes in Wales provide a system capable of tracing livestock movements between different locations to meet the requirements of the European Regulations.

Over time the livestock movement and tracing regime has grown more complex as it has been adapted 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 highlighted the need for simplification of the movement regime and also for improvements to the CPH number system which farms are identified by. His report addressed the risks, benefits and burden managed by the controls and the way that they have influenced farmer behaviour and compliance. The report concluded that significant simplification was possible.

Sir Ian Anderson's review of the handling of the foot and mouth disease outbreaks of 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.

2.0 Scope

In November 2013, the former Minister for Natural Resources and Food took the decision to rationalise the CPH system which involves the removal of Sole Occupancy Authorities (SOAs) and Cattle Tracing System (CTS) links along with the introduction of a distance rule. This consultation document explains ways in which the Welsh Government proposes to implement the changes and seeks views on the implementation of a revised distance rule for Welsh holdings.

The proposals are designed to provide keepers, the agricultural industry in Wales and the Welsh Government with a simpler, more effective and efficient system which at the same time increases Wales' resilience and ability to deal with a disease outbreak. They have been developed over time in conjunction with internal and external industry stakeholders which are represented on the Livestock Identification Advisory Group (LIDAG).

The policy for animal standstill¹ is not under review and will continue to operate as it does now to underpin the livestock movement regime. Welsh

¹ See annex 1 for glossary of terms

Government will also be consulting on proposals to introduce quarantine units (which may avoid the standstill applying to the whole holding) in 2015.

3.0 Current Position

All holdings of farmed livestock are identified by a CPH number, which is issued by the Welsh Government. When livestock move between holdings their keepers must report the movement to the central database using the CPH identifier to define the original location and destination.

The current allocation of CPH numbers is primarily on the basis of the business structure. Sheep holdings are based primarily on a 5 mile radius rule which was introduced in 2010 following the implementation of the Sheep and Goats (Records, Identification and Movement) (Wales) Order 2009 (SAGRIMO). Owned or rented parcels of land used to keep sheep or goats within 5 miles of the main holding (measured as the crow flies from the periphery of the main holding boundary) and not being used by other livestock keepers, can be registered as a single holding (one CPH number). Currently, there are no specific distance criteria for cattle holdings.

Cattle moves are reported to CTS, operated by the British Cattle Movement Service (BCMS). Sheep and goat movements are currently reported to the local authority by the premises of destination (via a movement document - AML1 form). Sheep and goat moves will be reported direct to the EIDCymru electronic database from January 2016. The movement of pigs are reported to the British Pig Executive (BPEX) electronic database.

Concessions to the CPH System in Wales

3.1 Sole Occupancy Authority (SOA)

- SOA's were introduced to allow keepers to manage the consequences of the standstill requirements within their businesses, following the 2001 foot and mouth epidemic. The SOA concession to standstill requirements, permits groups of premises within the same management and control to move livestock without triggering the standstill requirements.
- Standstill requirements apply when there is a movement of livestock onto any of the premises in the SOA from any premise outside the SOA.
- Identification and movement reporting rules still apply to all movements within a SOA.

The Welsh Government has removed the TB Pre-Movement Testing exemption that relates to movements between parcels of land within a SOA. Landowners with a SOA are able to apply for an Interim Land Association Management (ILAM) agreement (which allows untested moves between parcels of land within 10 miles of the main holding).

The approval of new SOA's ceased in November 2013 but those allocated between 2001 and 2013 are still valid.

3.2 Cattle

Some keepers who regularly move cattle between holdings have been allowed to 'link' the holdings on CTS administratively. Movements of cattle between these linked holdings do not need to be reported to the CTS database but keepers must continue to record the movement in their herd registers. CTS links do not remove a keeper's legal obligation to comply with other movement and disease control such as standstills or pre movement testing for bovine TB.

3.3 Sheep and Goats

The Sheep and Goats (Records, Identification and Movement) (Wales) Order 2009 implements Council Regulation 21/2004 in Wales. This Order introduced a '5 mile' distance policy for sheep and goat keepers. As stated above, owned or rented parcels of land used to keep sheep or goats within 5 miles of the main holding (measured as the crow flies from the periphery of the main holding boundary) and not being used by other livestock keepers, can be registered as a single holding (one CPH number). Movements between these parcels do not need to be recorded in the flock record or reported to the central database via a movement document (AML1 form). All other moves must be recorded and reported to the central database.

Reasons for Change

4.0 European Regulation

The current CPH system has become increasingly ineffective over recent years and the number of concessions explained above further weaken it.

Failure to amend the current system continues to expose the Welsh Government to a risk of infraction proceedings and also cross compliance disallowance penalties.

Regulation (EC) No 1760/2000 and the Cattle Identification (Wales) Regulations 2007 (as amended) for example state that all cattle movements should be notified to the relevant authority. The current practice of 'linked holdings' under implements EU Legislation because no formal derogation has been granted for their use.

These factors leave the current position in Wales untenable in the eyes of the European Commission.

4.1 UK Bovine TB Eradication Plan

The European Commission has written to the UK Government setting out a number of requirements if the UK is to continue to receive approval of its UK TB Eradication Plan and associated funding from the Disease Eradication Fund. The requirements include 'the completion and implementation of the plans for abolishing Sole Occupancy Authorities' and, 'a thorough review of the arrangements for the implementation in the UK of the concept "holding" as laid down in Union legislation'.

The decision by Welsh Ministers to stop issuing new SOAs from November 2013 partially satisfied the European Commission but over 6,000 SOA's remain in Wales and continue to operate under the current regime. The European Commission is keen for progress to be made and regularly requests updates on the situation.

4.2 Improved disease control

The CPH system is still aligned to the structure and activities of the agriculture industry in the 1950's, when it was introduced. Farming businesses have increased in size and with that have become increasingly fragmented by occupying multiple parcels of land at greater distance from each other.

Keepers have made it clear that this factor combined with the different movement reporting requirements between species and the complexity of when and how to use some of the concessions, such as CTS links and SOAs, is difficult to understand and is leading to genuine mistakes being made.

Since the introduction of the Single Payment Scheme in 2005, customers have been identified by a Customer Reference Number (CRN) rather than a location identifier. As a result, CPHs used by the industry are not always up to date or fit for purpose. As a direct consequence, the basis on which an effective disease management/control regime can be staged is compromised.

4.3 Strategic Framework

The enhanced CPH business rules will provide Welsh farmers and land managers with an opportunity to improve their efficiency and will reduce the burden of administration processes on them. This is in line with the proposed vision for the strategic framework for Welsh agriculture which was launched at the Wales Farming Conference on 4 June.

What are we proposing?

5.1 10 mile distance

For the purposes of enabling maximum effective disease control, it would be preferable to recognise a holding as a discreet parcel of land, with separate parts of the holding recognised under different CPH identifiers along with biosecurity measures between holdings. Such a method is far from the reality of current farming practises and would place a significant and, in practise unworkable, burden on the farming industry. Therefore it is necessary to strike a compromise that allows farming enterprises to continue to thrive whilst also ensuring a proportionate yet adequate level of control by all in the event of an outbreak.

The Welsh Government proposes to make a distinction (for all species) between land/buildings up to and including a 10 mile radius, as the crow flies, of the primary production location (PPL)².

Ten miles has been developed in conjunction with veterinary advisors from the Office of the Chief Veterinary Officer and external stakeholders of the LIDAG to balance the need to allow farmers to carry out their business and the need to have effective control measures. It is proposed that the 10 mile distance will be measured from the outer boundary of the PPL rather than a point from the centre of the CPH.

5.2 CPH Merge

The Welsh Government proposes to introduce a CPH merge facility which will be available to keepers who currently operate two permanent CPHs within 10 miles.

Land parcels within the 10 mile distance can be part of the single CPH provided they are under the same management control and that livestock cannot mix freely with other livestock from other holdings. CPH merges may occur under a range of circumstances and would be driven by the move to a 10 mile rule for CPH allocation for sheep keepers and also by the removal of SOA's and certain types of CTS links. The introduction of a single CPH for land within the 10 miles would not be mandatory.

All permanently occupied (i.e. over 364 days) land parcels (including buildings) under the same management control and within 10 miles would normally be included in the same CPH number. This means that:

- Merged parcels within 10 miles of the PPL would be considered as one holding and have one CPH identifier.
- Movement of livestock within the holding would not have to be reported to a central species database, or recorded in the farm register.
- Movement of cattle within the holding would not require a pre-movement TB test.
- When livestock move onto a location within the holding, the standstill would apply to the whole of the holding.

5.3 Land Association

The Welsh Government proposes that when short term/temporary land (e.g. summer grazing or winter tack) is occupied within 10 miles of the

² See annex 1 for glossary of terms

keeper's holding, and the keeper fulfils relevant sole occupancy criteria³, it would be possible for the keeper to associate these land parcels with the keeper's permanent CPH.

These associations could be established for a maximum of 364 days and would lapse after this timeframe (or the tenancy end date, whichever is soonest) after which they would need to be renewed. This means that:

- Movements within the holding (including to and from land associated with the PPL) would not have to be reported to a central species database, or recorded in the farm register.
- Movement of cattle within the holding would not require a pre-movement TB test.
- When livestock move onto a location within the holding, the standstill would apply to the whole of the holding.

5.4 CPH Split

The Welsh Government proposes that the extent of a CPH would be split in cases where the fragmented locations do not comply with the 10 mile rule.

In such cases, an additional CPH number would be required to cover the land which falls outside of the 10 mile boundary. This means that:

- All moves between holdings identified with a different CPH number, including temporary CPH's would have to be recorded in the farm register, and reported to the central species database. This would include:
 - serving the standstill,
 - pre-movement testing cattle for bovine TB
 - individually recording and reporting the full EID ear tag numbers of all sheep being moved within ownership.

5.5 Temp CPH Allocation

The Welsh Government proposes that keepers who chose not to, or are unable to (due to distance), associate short term rented land with their permanent CPH, can apply for a temporary CPH.

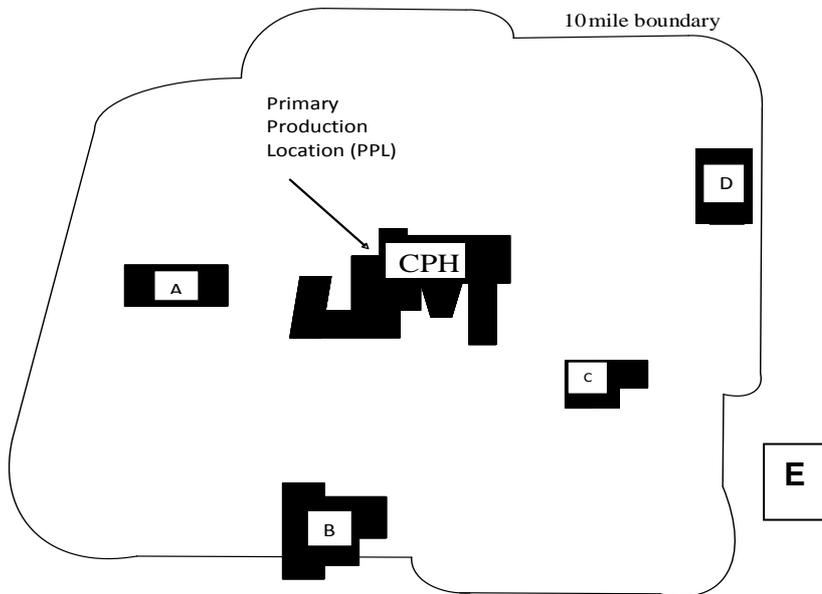
Temporary CPHs would expire after 364 days (or by the rental end date, whichever is soonest) and would need to be renewed by the keeper.

³ See annex 1 for glossary of terms

- All moves between holdings identified with a different CPH number, including temporary CPH's would have to be recorded in the farm register and reported to the central species database. This would include:
 - serving the standstill,
 - pre-movement testing cattle for bovine TB
 - individually recording and reporting the full EID ear tag numbers of all sheep being moved within ownership.

Diagram 1.0

The diagram below (not to scale) illustrates the concept of a Primary Production Location (PPL) and the various CPH allocation rules associated with fragmented holdings.



i)	Block/Parcels A-D	Eligible for 'merging' or 'associating'. See para 5.2/5.3.
ii)	Block/parcel E	Is over 10 miles from the PPL and therefore an additional CPH number would be required to accommodate the land occupied outside of the 10 mile boundary. See para 5.4
iii)	Block B	Is bisected by the 10 mile radius but is contiguous ⁴ to land within the radius. This is considered as one block and is eligible for merging (if owned or on a long term rent) or associating (if short term rent)

⁴ See annex 1 for glossary of terms

5.6 Common land

The Welsh Government proposes that when the PPL is contiguous with the common land, keepers can merge the common as part of their holding.

All moves between common land and non-contiguous PPLs would have to be recorded and reported to the central species database. This includes serving the standstill, pre-movement testing cattle for bovine TB and individually recording or reporting breeding sheep being moved within ownership.

5.7 Transitional arrangements

The Welsh Government proposes that holdings are cleansed of CTS links and SOAs on a “whole case working” approach.

This option is proposed as it would ensure the best customer experience. It is anticipated that the cleansing of all CPHs in Wales would take approximately two years. The approach would be proactive and address each established customer case with a CTS link and/or SOA, revising their CPH allocation against the new distance rule and providing the customer with options for rationalising their CPH(s) in line with the new business rules.

6.0 Benefits

The proposed changes to the CPH allocation system would result in significant infrastructure improvements to the movement reporting systems. The proposals would:

- Standardise the way farms are registered and in turn allow the current complex rules and movement reporting exemptions to be simplified, reducing the administrative burden on farmers. Keepers would be permitted to move livestock between land parcels (owned and rented) within a 10 mile radius of their main site without recording the move in the on farm holding register, reporting the movement to the national database or serving a standstill.
- Involve capturing, and maintaining all land parcels which constitute a holding. Implementing the distance rule would significantly improve knowledge of those land parcels being used for livestock production, consequently improving the ability to respond quickly and effectively in a disease outbreak;
- Simplify reporting and standstill regimes across species (cattle, pigs, sheep and goats) so that keepers can understand and comply with requirements easily and consistently, in particular for those farming both cattle and sheep;
- Provide a more accurate targeting of inspections and setting of disease control zones which would help reduce the impact on farmers in the event of disease outbreaks;

- Improve consistency with other administrations so that the CPH rules are easier for farmers to understand.

7.0 Costs

- Analysis based on subsidy data for 10 counties in England and Wales shows that 93% of farms have a spread of less than 10 miles⁵ meaning that most farmers would not be adversely affected by these changes.
- Increasing the current 5 mile limit for sheep to a 10 mile limit for all species would reduce the regulatory burden for many farmers. This would help to mitigate difficulties faced by farmers losing SOAs and CTS links.
- For those cattle holdings currently with CTS links more than a 10 mile radius from the PPL, there would be increased movement reporting requirements when links are withdrawn and some businesses may face additional costs associated with bovine TB testing requirements. These proposals do not deal explicitly with bovine TB. Any consequential changes deemed necessary to that regime will be dealt with separately, in the context of the work being undertaken by the Office of the Chief Veterinary Officer (OCVO) to constantly review the pre-movement testing regime.
- For those with CTS links within 10 miles, there would be some time costs in 'associating' temporary land to the PPL, but this should be offset by the subsequent reduction in moves that would need to be recorded in the herd register.
- For those cattle, sheep and pig keepers with SOA's more than a 10 mile radius away, there would be costs associated with serving the standstill following the removal of the SOA concession.
- The 10 mile limit does not align with 3 km radius protection zones and 10 km radius surveillance zones in the event of a disease outbreak. Having a holding operating over a larger distance would probably make disease control zones larger so as to take account of the risk. This means that in an outbreak of a major disease, the farming industry would see a greater but more consistent restriction on its continuing operations.

⁵ Source – Animal Health - Livestock Partnership Livestock Movement Units Project - Field Study Final Report

Consultation Response From

Your details

Your name:	
Your organisation (if applicable):	
Your address:	
Responses to the consultation will be made public in a report on our website. Would prefer your response to remain anonymous?	Y/N
Which one of the following best describes you? <ul style="list-style-type: none">• Farmer• Farming industry representative or organisation• Member of the public• Other	

What do you think?

We would welcome your comments on the proposals in this document – references to the numbers of the paragraphs in this document will help us identify which proposals you're commenting on.

We would particularly welcome your responses to the following questions:

1. Do you agree with any or all of the proposals set out in this document?

Please state which proposals, (including the paragraph number within this document) you agree with and why you agree with them.

2. Do you disagree with any or all of the proposals set out in this document?

Please state which proposals, (including the paragraph number within this document) you disagree with and why you disagree with them.

3. Do you have any suggestions about how any or all of the proposals set out in this document could be improved or how they could best work in practice?

4. Are there any other comments you would like to make?

Annex 1

Glossary of terms and definitions

<p>1. Primary production location (PPL)</p>	<p>The PPL is the main location of the CPH reference. The external boundary of the PPL is the location from where each holding and/or fragmented land parcel(s) within the group is measured.</p> <p>Criteria (in order of priority):</p> <ul style="list-style-type: none"> • The PPL is the location of the livestock buildings/ milking parlour / main handling facilities for animal health and welfare/ husbandry purposes. In the majority of cases this will be the same as the correspondence address. • If no buildings/ housing are present (i.e. in the case of an extensive holding), the PPL would be the gathering location. • In the minority of cases, where the keeper occupies no enclosed land, only common grazing rights, the PPL is the correspondence address. • Location of the greatest proportion of owned land/long term let. • Common land cannot be considered part of the PPL <p>This rule will be used consistently in order to determine if land can be merged or associated into the CPH reference.</p>
<p>Contiguous</p>	<p>Contiguous land is determined by assessing directly adjoining parcels on the Welsh Government Land Parcel identification system (LPIS), which incorporates permanent features such as water courses.</p> <p>In circumstances where the other holding(s)/ fragmented land contains parcels that fall outside the 10 mile distance but the shortest distance between that holding and the reference holding is within the specified distance (i.e. a contiguous block), all parcels within the other holding will be eligible to be merged into the CPH that forms the group of holdings. This is illustrated in Diagram 1.0: Block B straddles the 10 mile limit from the PPL but the</p>

	contiguous block is considered within the CPH reference area.
Sole occupancy	<p>Providing that the keeper can demonstrate sole occupancy, the revised CPH allocation rules allow keepers to merge and/or associate fragmented parcels/ or groups of contiguous parcels which fall within 10 miles of the PPL into their CPH reference. The conditions for demonstrating sole occupancy are as follows:</p> <p>Criteria</p> <ul style="list-style-type: none"> • Premises owned or rented by an individual, partnership or company on which all the animals are under the sole control of the individual/partnership/company. • Individual fields or buildings that are owned must be under the sole management of the individual/partnership/company. • Individual fields or buildings that are rented must be under the sole management of the individual/partnership/company for the duration of the tenancy. • Fields or buildings (owned or rented) which are used by separate individuals, partnerships or companies, are considered to be under separate sole occupancies even if the individual fields, etc. were part of the same original CPH number. • Where another individual has a right of access through land owned or rented by the individual/partnership/company it can not be accepted as sole occupancy unless the right of access will not be used at any time to move animals on foot. • Individual fields or buildings (owned or rented) must have: <ul style="list-style-type: none"> • Separate access points to other fields or buildings not in the same sole occupancy. • A stock-proof boundary e.g. fence/ hedge/ wall, appropriate to the animals on that land, to keep animals under different sole occupancies separated. • Livestock cannot mix freely with other livestock from other holdings.
Standstill	The requirement of livestock to standstill for 6 (sheep, goats and cattle) or 20 (pigs) days. A standstill encompasses the holding onto which animals have been moved and does not allow for other livestock to move off the holding until the standstill obligation has been met. The standstill

	allows any fast moving disease to disclose before infected livestock is released into a new animal population.
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