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Llywodraeth Cymru
Welsh Government

Welsh Government Consultation – summary of response

Consultation on holding identifiers and associated livestock movements

March 2016

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

1.0 Background Information

The CPH reference number underpins a number of control systems as it is used to identify farmed holdings. Its primary purpose is to identify and trace the location of livestock, as required by European Regulations, 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.

2.0 The consultation process

The Deputy Minister for Farming and Food agreed to a public consultation on proposals to change business rules for the allocation and management of County Parish Holding identifiers. The proposals have been developed over time in conjunction with internal stakeholders and external industry representatives through the Livestock Identification Advisory Group (LIDAG).

The consultation document was published on the Welsh Government's consultation website.

3.0 The Consultation proposals and questions

The CPH allocation rule proposals involve:

- 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);
- To introduce a CPH merge facility which will be available to keepers who currently operate two permanent CPHs within 10 miles;
- When short term/temporary land (e.g. summer grazing or winter tack) is occupied within 10 miles of the keeper's holding, and the keeper fulfils relevant sole occupancy criteria, it would be possible for the keeper to associate these land parcels with the keeper's permanent CPH;
- The extent of a CPH would be split in cases where the fragmented locations do not comply with the 10 mile rule;
- 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;
- That when the PPL is contiguous with the common land, keepers can merge the common as part of their holding;
- That holdings are cleansed of CTS links and SOAs on a "whole case working" approach.

4.0 Responses to the Consultation

The Welsh Government received 12 responses from a range of organisations and individuals, which are listed at Annex A.

One respondent asked that their personal details are not published.

Not every responder answered every question in the consultation document.

5.0 Consultation responses:

5.1 Implementation of a 10 mile radius distance limit to be measured from the outer boundary of the primary production location (PPL).

11 respondents agreed, and 1 disagreed.

The Agri Academy Rural Leadership Programme 2014 (Agri Academy) stated that 'this proposal is positive in terms of simplifying movement control regulations for livestock owners. This proposal also has the added benefit of better disease control'.

The British Veterinary Association (BVA) agreed that the 'New proposals for keepers, industry and Welsh government will be simpler, more effective, efficient and increases Wales resilience to deal if required with a Disease outbreak. In particular, we support the proposal to make a distinction between land/buildings up to and including a 10 mile radius of the primary production location (PPL) following advice taken from veterinary advisors from the Office of the Chief Veterinary Officer and members of the Livestock Identification Advisory Group (LIDAG).

We agree that the ten mile proposal adequately balances the need to allow farmers to carry out their business and the need to have effective control measures. However, some clarity is needed on the approach which would be taken to a parcel of land located wholly outside the proposed 10 mile radius but directly contiguous with a parcel of land which straddles the boundary, and where the transfer of stock could require no more than an opened gate. Clear guidance on the management of such scenarios should be made available'.

The Country Land Association (CLA) commented that 'An overhaul of the existing CPH programme is well overdue. Going forward these proposals look a sensible balance for all concerned'.

The National Sheep Association Cymru/Wales Region (NSA) agreed with this proposal and welcomed the clarity over the use of the outer boundary being where the 10 mile distance will be measured from.

The Farmers Union of Wales (FUW) responded in agreement stating 'The majority of members agreed with the broad principle of establishing a ten mile rule and allowing land within that distance from the boundary of a Primary Production Location (PPL) to become a part of a single CPH over an appropriate transition period'.

One respondent, Elan Valley Trust Farm does not feel that the implementation of a 10 mile rule would help and said that 'whilst there initially appears to be significant benefits in reducing the bureaucracy by streamlining the system there would be significant and practical difficulties'.

The Welsh LAA expressed concern that 'an example of the issues of over 10 miles is a Heifer rearing unit supplying calved heifers to the main dairy herd situated beyond 10 miles fails a pre movement TB test, this will be a huge headache and welfare issue for the owner'.

5.2 Introduce a CPH merge facility which will be available to keepers who currently operate two permanent CPHs within 10 miles.

Eight respondents commented specifically about CPH merge and they all agreed with the proposal. Comments from the NSA stated that 'We agree with the option of being able to merge permanent CPHs within one new CPH. We agree that this should be optional and not mandatory'.

Similarly, the Central Association of Agricultural Valuers (CAAV) said that 'The proposal to merge CPHs for land within the 10 mile radius where it is under the same management control again seems sensible, provided a farmer can choose whether or not he wants to merge CPHs. It must not become mandatory to merge CPHs. This will simplify farming practices but still allow effective disease control'.

5.3 Land Association- when short term/temporary land (e.g. summer grazing or winter tack) is occupied within 10 miles of the keeper's holding, and the keeper fulfils relevant sole occupancy criteria, it would be possible for the keeper to associate these land parcels with the keeper's permanent CPH.

Eight responses commented and they were all in agreement with the proposal.

In summary, the British Cattle Veterinary Association (BCVA) considered the proposals are 'very sensible'. This view was reiterated by the NSA, stating that the proposals for land associations for temporary land within a 10 mile distance was sensible, as an option for farmers.

The CAAV stated that 'Again it seems very helpful to give livestock keepers the option to associate land that is occupies for 364 days or less with their main CPH where that land is within 10 mile radius'.

Some FUW members believed that the use of the word 'link' would be better understood by the industry based upon past experience.

5.4 CPH Split- the extent of a CPH would be split in cases where the fragmented locations do not comply with the 10 mile rule

There were seven responses in total with all generally supported this proposal with the exception of one of the requirements associated with sheep movement reporting.

The NSA stated 'We accept that farms with fragmented land areas that fall outside the 10 mile distance will need separate holding numbers, and that moves between these holdings will trigger full movement recording and reporting, and a standstill. We consider the risks higher where stock are being moved from further afield, and we know that many farm businesses will end up with separate CPHs that are only just outside the 10 mile distance. Consequently we urge the WG to ensure that rules and conditions relating to any future quarantine units are practical and not overly cautious'.

The Agri Academy, CLA, NFU Cymru and FUW all disagreed with additional sheep movement reporting requirement. The Agri Academy stated that they 'agree with CPH split but questions why is the need for individual recording when ownership has not changed'.

Similarly, the CLA expressed a concern that had been raised by their membership in relation to the loss of the derogation for batch movements of sheep. 'The additional work created by the requirement for individual recording and reporting the full EID ear tag numbers of all sheep being moved even within ownership on, for instance, Winter Tack arrangements, cannot be underestimated'.

NFU Cymru said that 'Sheep farmers must be able to continue with the ability to batch record sheep movements where the ownership of animals does not change e.g. to tack and home. NFU Cymru does not agree with paragraph 5.4 bullet point 4 of the consultation document. We do not believe that there is any animal health justification to do away with the derogation that allows for batch recording of sheep where the ownership does not change. NFU Cymru does not see the relevance or justification for implementing this change which will add significant time and hassle for sheep farmers taking sheep to outlying land beyond 10 miles from their main holding or to and from "tack". A continuation of the current procedure would still require the movement to be recorded and reported to EID Cymru, this would allow for the batch to be easily traced in the event of a notifiable animal disease outbreak which is all that APHA would require'.

FUW members 'objected to the significant increase in work, administrative costs, and the added risk of penalties which would accompany the abolition of the exemption from individual sheep recording for moves within ownership. Moreover, it was believed that the economic and epidemiological arguments in favour of such an exemption would be as valid over the coming years as they were when the exemption was first introduced, and that the abolition of such an exemption represented a departure from the Working Smarter principles and the stated Welsh Government aim of reducing administrative burdens for industry'.

5.5 Temporary CPH Allocation (tCPH)- 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.

Not all of the responses answered this question although, those who did – Agreed. The facility to apply for a temporary holding was very much appreciated due to the flexibility it provided.

To summarise, the CAAV stated 'We welcome the inclusion of temporary CPHs for short term occupied land outside the 10 mile radius and also where a keepers decides he would prefer a temporary CPH. This is helpful flexibility. There will however be issues for such keepers with the removal of CTSlincs as they will have to report all movements between CPHs under the proposed changes which is an increased administrative burden'.

The BCVA said that the proposals were 'very sensible' and the NSA required clarification that there 'will not be a requirement for annual renewal'.

5.6 When the PPL is contiguous with common land, keepers can merge the common as part of their holding.

Five comments were received in relation to common land, and all were generally in agreement with the proposal.

The BVA 'fully support the proposal that when a PPL is contiguous with common land, keepers can merge the common as part of their holding'.

The BCVA and CAAV consider the proposal to be helpful but further clarity is required regarding the need for TB testing and how it would affect multiple common land graziers.

The NSA stated that they 'agree with the principle of merging common land with the PPL but rather than this only be an option when land is contiguous we see no reason why this couldn't be dealt with within the principle of a 10 mile distance'.

5.7 Transitional arrangements- holdings are cleansed of CTS links and SOAs on a "whole case working" approach.

Seven respondents commented specifically on this proposal which resulted in wide spread support.

NFU Cymru strongly supported the processes 'that CTSlinks and SOA's are only removed once the customer has had the opportunity to rationalise their holding in line with the new CPH rules'.

This consensus was also shared by the NSA. The BVA commented that as keepers are unable to apply for SOA's at present that the transitional period needs to commence as soon as possible.

One respondent (anonymous) disagreed with the abolition of links 'Changing the system of links creates more work and costs on an industry already in recession. Links currently work well for us therefore we do not want more changes'.

The Welsh LAA expressed concern that 'Although time consuming at first in the long term it will simplify movements and reduce operating costs. Larger scale producers with land over 10 miles would be hit by the cleansing of SOA's and CTS links'.

6.0 General comments

The Agri Academy requested clarification on rules for farms along the Welsh border stating 'it is assumed if the primary holding is registered within Wales then the 10mile rule still applies even to land over the border otherwise this would be unfair to those farmers'.

The CAAV required full clarity on 'what land is allowed for example rented/tenancy/grazing licence and "management control of land or "management control of livestock'

The FUW concluded that 'There needs to be one rule for cattle and sheep going forward. Members highlighted the need to ensure legal requirements in terms of keeping movement books, cattle passports etc. on individually registered holdings could be practically overcome, rather than a situation arising (for example following the abolition of CTS links) whereby multiple movement books had to be kept, and documents had to be kept on each registered holding'.

NFU Cymru stated that the 'Land transfer process for BPS should be linked with this new CPH programme. We would also stress the importance of this process being linked with the Field Maintenance and Land Transfer element of the Basic Payment Scheme.

List of Respondents

1. Farmers Union of Wales (FUW)
2. Agri Academy Rural Leadership Programme 2014 (Agri Academy)
3. NFU Cymru
4. Hybu Cig Cymru (HCC)
5. Welsh Livestock Auctioneers Association (LAA)
6. British Veterinary Association (BVA)
7. National Sheep Association Cymru/Wales Region (NSA)
8. Country Land Association (CLA)
9. British Cattle Veterinary Association (BCVA)
10. The Central Association of Agricultural Valuers (CAAV)
11. Anonymous
12. Estate Manager, Elan Valley Trust Farm