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FINAL REPORT OF A MISSION
CARRIED OUT IN THE UNITED KINGDOM
FROM 12 TO 16 DECEMBER 2005
IN ORDER TO EVALUATE THE OPERATION OF THE
OVINE AND CAPRINE
IDENTIFICATION SYSTEMS

Please note that factual errors in the draft report have been corrected. A clarification provided by the UK Competent Authorities is given as a footnote, in bold, italic, type, to the relevant part of the report.



TABLE OF CONTENTS

1.	INTRODUCTION.....	4
2.	OBJECTIVES OF THE MISSION.....	4
3.	LEGAL BASIS FOR THE MISSION.....	4
4.	BACKGROUND.....	5
5.	MAIN FINDINGS.....	5
	5.1. Competent authority performance.....	5
	5.2. Legislation.....	6
	5.3. Registration of holdings.....	8
	5.4. Holding registers.....	8
	5.5. Animal identification.....	9
	5.6. Movement controls.....	10
	5.7. Manufacturers of ear tags.....	11
	5.8. Computer database.....	11
	5.9. Controls on holding registration, animal identification and movement controls.....	12
	5.10. Awareness and training.....	14
	5.11. Miscellaneous.....	14
6.	CONCLUSIONS.....	14
	6.1. Competent authority performance.....	14
	6.2. Legislation.....	14
	6.3. Registration of holdings.....	15
	6.4. Holding registers.....	15
	6.5. Animal identification.....	15
	6.6. Movement controls.....	15
	6.7. Manufacturers of ear tags.....	15
	6.8. Computer database.....	15
	6.9. Controls on holding registration, animal identification and movement controls.....	15
	6.10. Awareness and training.....	16
	6.11. Overall conclusion.....	16
7.	CLOSING MEETING.....	16
8.	RECOMMENDATIONS TO THE COMPETENT AUTHORITIES OF UNITED KINGDOM.....	16
	ADDENDUM.....	17

ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

AMES	Animal Health and Welfare Management & Enforcement System
AMLS2	Animal Movement Licensing System, second version of the movement database
APHIS	Animal & Public Health Information System
CA(s)	Competent Authority(ies)
CCA(s)	Central Competent Authority(ies)
DARD	Department of Agriculture and Rural Development – Northern Ireland
DEFRA	Department for Environment, Food and Rural Affairs
DG SANCO	Health & Consumer Protection Directorate General
England Order 2005	The Sheep and Goats (Records, Identification and Movement) (England) Order 2005
EU	European Union
FVO	Food and Veterinary Office
GB	Great Britain
NI	Northern Ireland
NI Order 2005	The Sheep and Goats (Records, Identification and Movement) Order (Northern Ireland) 2005
Region(s)	England, Scotland, Wales and/or NI
SAMS	Scottish Animal Movement System
SEERAD	Scottish Executive's Environment and Rural Affairs Department
UK	United Kingdom

1. INTRODUCTION

The mission took place in the United Kingdom¹ from 12 to 16 December 2005. The mission team comprised 2 inspectors from the Food and Veterinary Office (FVO). The mission was undertaken as part of the FVO's planned mission programme.

The inspection team was accompanied during the whole mission by representatives from the Central Competent Authorities (CCA), the Department for Environment, Food and Rural Affairs (DEFRA) and regional Competent Authorities (CAs).

An opening meeting was held on 12 December 2005 with the CCA and representatives of the four regional CAs. At this meeting, the objectives of, and itinerary for, the mission were confirmed by the inspection team, and additional information required for the satisfactory completion of the mission requested.

2. OBJECTIVES OF THE MISSION

The mission was carried out to evaluate the systems for identification and registration of ovine and caprine animals in the United Kingdom, according to Article 4 (2) (d) of Council Regulation (EC) No 21/2004. The mission verified the implementation of the actions proposed by the United Kingdom to address the recommendations made in the previous report (reference number DG(SANCO)/7541/2005)², and in particular to take necessary measures to ensure compliance with Regulation (EC) No 21/2004. These actions were presented to a meeting of the Standing Committee on the Food Chain and Animal Health on 5 July 2005.

In pursuit of these objectives, the following sites were visited:

VISITS			Comments
Competent authority	Central	1	DEFRA
	Regional	3	Wales, Scotland and NI
	Local	2	Wales and NI
Farm holdings		5	Wales, Scotland and NI
Livestock markets		2	Scotland and NI
Slaughterhouses		2	Wales and NI

3. LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation and, in particular:

- Article 12 of Council Regulation (EC) No 21/2004³ of 17 December 2003 establishing a system for the identification and registration of ovine and

¹ The United Kingdom comprises Great Britain (England, Scotland and Wales), hereafter referred to as GB, and Northern Ireland, hereafter referred to as NI.

² Referred to as the 'previous report' in this report

³ Official Journal L 5, 09.01.2004, p. 8

caprine animals and amending Regulation (EC) No 1783/2003 and Directives 92/102/EEC and 64/432/EEC;

- Article 2 of Commission Decision 2005/617/EC⁴ of 17 August 2005 temporarily recognising the systems for identification and registration of ovine and caprine animals in Great Britain and Northern Ireland, the United Kingdom, according to Article 4(2)(d) of Council Regulation (EC) No 21/2004; and
- Commission Decision 98/139/EC⁵ of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in Member States.

4. BACKGROUND

Regulation (EC) No 21/2004 establishes a system for the identification and registration of sheep and goats. Article 4(2)(c) of Regulation (EC) No 21/2004 allows Member States to operate an alternative system for the identification of sheep and goats not involved in intra-Community trade, which must conform with section A.5 of the Annex to Regulation (EC) No 21/2004 and may operate until 1 January 2008. On this basis, the United Kingdom asked the Commission to recognise its alternative systems. Subsequently, Commission veterinary experts carried out a mission (reference number DG(SANCO)/7541/2005)⁶ to review the proposed systems and found a number of shortcomings.

The United Kingdom undertook to address these shortcomings and to ensure compliance with Regulation (EC) No 21/2004 within 10 weeks of the requested approval of its national systems being granted. As a result, Commission Decision 2005/617/EC temporarily recognised the systems operated by the United Kingdom, for the period from 9 July 2005 until 30 April 2006. This provisional approval shall be reviewed in light of further inspection findings by 31 January 2006.

5. MAIN FINDINGS

5.1. Competent authority performance

Responsibilities for the computer databases (see also section 5.8) are divided according to region: in England and Wales the Local Authority is responsible for entering movement notification information on their national computer database. Movement notification information in Scotland is entered on their national computer database by a dedicated unit within the Scottish Executive's Environment and Rural Affairs Department (SEERAD). In NI, the Department of Agriculture and Rural Development (DARD) veterinary service is responsible for the entry of movement notification information into their national computer database.

Concerning official controls (see also section 5.9), on-farm cross-compliance inspections that include checks on sheep and goat identification and registration requirements are carried out on at least 1% of farms in GB and NI claiming direct agricultural support. These inspections are the

⁴ Official Journal L 214, 19.08.2005, p. 63

⁵ Official Journal L 038, 12.02.1998, p. 10

⁶ Referred to as the 'previous mission' in this report

responsibility of Rural Payments Agency inspectors in England, Rural Inspectorate in Wales, SEERAD agricultural inspectors in Scotland and DARD agricultural inspectors in NI. However, in NI, veterinary service inspectors share the responsibility for carrying out these inspections.

Responsibility for official controls at markets and slaughterhouses and for other inspections on farms also varies according to region: in England and Wales inspections are carried out by Local Authority Trading Standards officers, within the terms of a Framework Agreement through which Local Authorities are paid for the work carried out. In Scotland, they are also the responsibility of Local Authorities, which can include Scottish Police forces, which report to the SEERAD. In Northern Ireland these inspections are carried out by DARD Veterinary Service inspectors.

Observations:

- in GB, Local Authority inspectors are not provided with instructions concerning the scope (i.e. documentary, database and/or physical checks) and extent (e.g. number of animals to be examined) of inspections of markets, slaughterhouses or farm holdings;
- DEFRA does not audit the work performed on its behalf by the Local Authorities in England and Wales;
- in NI, detailed staff instructions have been issued covering all aspects of the system, including office procedures and official controls at markets and slaughterhouses;
- an audit team was established in NI to check that inspectors in each division were recording official controls at markets and slaughterhouses correctly. Following one such audit, which had revealed a failure to issue a warning to keepers presenting misidentified sheep, prompt corrective action was taken by the Divisional Veterinary Officer;
- in NI, CA representatives have visited each Divisional Veterinary Office since the previous mission to introduce the new system and to explain the roles and responsibilities of local officials.

5.2. Legislation

Since the previous mission new legislation has been drafted that makes reference to the requirements of Regulation (EC) No 21/2004. The *Sheep and Goats (Records, Identification and Movement) (England) Order 2005* (the England Order 2005) entered into force on 30 November 2005 and *The Sheep and Goats (Records, Identification and Movement) Order (Northern Ireland) 2005* (the NI Order 2005) on 1 December 2005.

It is foreseen that equivalent legislation will be in place in Scotland during the week commencing 9 January 2006 and in Wales by March 2006⁷.

The systems for identification and registration are different in GB and NI. Whilst legislation on requirements for identification, registration and movement in the three regions in GB are similar on the main points, the CCA stated that the system in NI is more closely aligned with that in place in the Republic of Ireland.

Observations:

- the NI Order 2005 are in contradiction with Regulation (EC) No 21/2004 on the following point:
 - Regulation (EC) No 21/2004 requires keepers to identify animals within six months from the date of birth but allows Member States to extend this period to nine months for animals kept in extensive or free range farming conditions. The NI Order 2005 grants all keepers the maximum period of nine months, regardless of farming conditions. Some intensive sheep farming systems were seen during the visit;
- on other issues the interpretation of Regulation (EC) No 21/2004 made by the UK caused some concern:
 - the CAs in GB and NI consider that a holding may be composed of several separate parcels of land used by a single farm business:
 - in GB, all of the land comprising a holding must be within 5 miles (8 km) of the main site. Otherwise the parcel of land is considered to be a separate holding. If animals are moved within a holding the keeper is not required to complete a movement document or to report the movement. However, if the move is between unattached land parcels within the holding the keeper should record the movement in the flock or herd register.
 - in NI, all land managed within a farm business is considered to form a single holding regardless of the location of the land parcels or the distance between them. Keepers are not required to record movements of animals within a holding in the flock or herd register or to notify the CA;
 - the model holding registers included in the England Order 2005 and the NI Order 2005 includes the information specified in Article 5 of Regulation (EC) No 21/2004. Revised holding registers meeting the requirements of Regulation (EC) No 21/2004 will be introduced in Wales and Scotland when the new legislation enters into force.

⁷ *In their response to the draft report the UK Authorities informed that “The Sheep and Goats (Identification & Traceability)(Scotland) Regulation 2006 has been made and comes into force 20 March 2006. The Sheep and Goats (Records, Identification and Movement) (Wales) Order 2006 will take effect on 5 April 2006.”*

However, the NI Order 2005 differentiates between ‘flock’ and ‘holding’ numbers. The flock number is allocated to a group of animals rather than to a place. The NI Order 2005 obliges keepers to record the “flock number of the previous holding” in the holding register. The CA explained that in practice each holding is allocated no more than one flock number;

- the NI Order 2005 obliges market and slaughterhouse operators to ensure that no animals are accepted unless they are correctly identified. This is not the case in the England Order 2005.

5.3. Registration of holdings

Since the previous mission the following actions have been taken to meet the requirements of Article 7 of Regulation (EC) No 21/2004:

- annual inventories in accordance with article 7(2) of Regulation (EC) No 21/2004 will be carried out. The first annual inventory of holdings in NI was planned for 5 December 2005 and in GB for 1 January 2006. At present the agricultural census 2004 provides the most recent statistics available on the number of sheep and goat holdings and the total population in each of the regions;
- keepers of animals in England and Wales were notified of the new rules concerning the registration of holdings, including common grazing land. They were asked to register all outlying land that they use or to de-register their holdings if they no longer keep animals.

Observations:

- the CAs in all regions were in the process of informing keepers of the requirement to submit an annual inventory during this mission;
- no link has yet been established between the holding registers in GB and NI.

5.4. Holding registers

In GB keepers are required to record the movement of sheep and goats to and from their holdings in the holding register within 36 hours. In NI keepers must complete the register within 7 days.

In case of animals moved to temporary (including winter) grazing where the responsibility for the care of the animals is transferred to a different keeper then the movement has to be recorded in the receiving keepers holding register. Where animals are moved to temporary grazing e.g. common grazing and the responsibility for the care of the animals remains with the keeper, the keeper must ensure that the movements to and from the other holding are recorded in the holding register of origin.

Observations:

- holding registers were kept on all holdings visited. In Wales these were based on current legislation in place. On one farm visited no register had

been maintained prior to August 2004. In NI holding registers based on either the old or new legislation were presented;

- when compared with the corresponding movement documents, most holding registers seen in all regions visited contained inaccuracies. For example, there were differences in the date of arrival or departure, differences in the total number of animals moved and incorrect information concerning the destination. On one farm visited the keeper stated that during a recent CA visit, no cross check has been carried out between the data in the holding register and the movement documents;
- on a holding in GB a large number of replacement tags had been applied but no record of the events was entered in the holding register, as required by point B(1) of the Annex to Regulation (EC) No 21/2004.

5.5. Animal identification

If an animal's ear tag is lost or becomes illegible a replacement tag must be applied. If the loss occurs on the natal holding a UK-ear tag is applied and the animal may be traded freely. Otherwise, a replacement tag is applied and the animal is excluded from intra-Community trade, although it may still be traded within the country and can be slaughtered for human consumption.

The system of animal identification for GB was described in the previous report and is largely unchanged. One change that was included in the new GB legislation, already in force in England, is a prohibition on the use of temporary marks (e.g. paint) as an official means of identification. In future all animals must be identified using ear tags.

The system of animal identification for NI has been described in the previous report. Among the changes made since then include:

- animals moved to a second holding are no longer required to be tagged immediately on arrival. Instead, the keeper must apply the tag within 12 months of its arrival or before it leaves the holding, whichever is sooner;
- the NI Order 2005 corrects an anomaly in the previous regional legislation by requiring animals entering intra-Community trade to be identified in accordance with the requirements of Article 4(2) (b) of Regulation (EC) No 21/2004.

Observations:

- animals born after 9 July 2005 were generally identified as required by regional legislation, but a few irregularities were noted at a market visited in Scotland:
 - a few young sheep were identified with tags reserved for unidentified older sheep (S-baseline tags) instead of UK tags;
 - another sheep with an illegible tag had been re-identified with a S-baseline tag instead of a replacement tag and therefore would not be excluded from intra-Community trade;

- an animal without an ear tag was accepted at the market and was further traded without identification;
- market and slaughterhouse operators in GB routinely check that animals are identified with ear tags but they do not cross check the information on the ear tags against the movement document;
- currently unidentified sheep presented at slaughterhouses must be accepted for slaughter. The CA explained that new EU food hygiene regulations will allow the official veterinarian to exclude these animals from the food chain;
- in both slaughterhouses visited the identification codes of animals that arrived dead were not recorded. Moreover, in the slaughterhouse in NI no official veterinary record was available for a sheep that arrived dead from Scotland.

5.6. Movement controls

In GB the system of movement controls was described in the previous report. Since then minor changes have been made to the movement documents in order to comply with the requirements of Article 6 of Regulation (EC) No 21/2004. The new model is included in the England Order 2005.

In NI the system of licensing for sheep and goat movements applied since 2001 was described in the previous report. With the coming into force of the NI Order 2005, keepers are now obliged to complete a movement document, a model of which is included in the NI Order 2005.

In GB and NI the keeper at the destination holding is obliged to notify the CA of the arrival of sheep or goats on the holding. The reporting deadline is set at 3 days in GB and 7 days in NI. The keeper on the holding of origin is not required to notify the CA of the movement.

Observations:

- a high number of movement documents seen at different sites visited were not correctly completed e.g. failure to provide information on the animal transporter, missing signature of the keeper, missing registration number of holding of origin or flock number;
- market operators are permitted to use sales invoices instead of an official movement document. However, these invoices typically do not include all of the information specified in point C of the Annex to Regulation (EC) No 21/2004 e.g. name of transporter, means of transport, signature of keeper;
- at a slaughterhouse visited, the identification codes of 6 out of 35 animals that arrived in a single consignment did not correspond with the identification codes recorded on the movement document. The official veterinarian stated that checks between the animal identification and information on the movement documents are not systematically carried out;

- in Wales, a movement document was presented confirming the arrival of 401 sheep at the same slaughterhouse. All of the animals were declared “fit to kill” according to the official veterinary records. However, only 399 animals were recorded as being killed and the manager of the slaughterhouse explained that two animals never arrived. The identification of the missing animals remained unknown. Moreover, the slaughterhouse did not notify the official veterinarian of the arrival of the sheep;
- at one market visited some of the animals sold during the last sale had not yet left the market, but were recorded in the market records as having been moved to their destination.

5.7. Manufacturers of ear tags

Similar but separate systems have been established in GB and NI for the authorisation of ear tags used on sheep and goats and for the allocation of unique individual identification numbers to holdings or flocks.

Official ear tags must be authorised before they can be offered for sale. In order to have new models of ear tags authorised, the manufacturer must prove that they meet quality and performance standards included in a publicly available specification document. Temporary approval has been granted for previously available models until July 2006.

All approved companies supplying ear tags to sheep and goat keepers are connected to the two official computer systems in GB and NI. Before supplying ear tags to a customer, they must verify that the keeper and flock are registered on the official register of holdings and request the system to allocate a range of unique ear tag numbers to be used in the flock.

Observations:

- at one livestock market visited in NI, ear tags were seen from one manufacturer which were badly printed. Digits were partly cut off. The keeper stated that he had received 700 tags in similar condition. The CA took note of the findings and initiated an investigation.

5.8. Computer database

As described in the previous report, the computer database in the UK is divided: the Animal Movement Licensing System, (AMLS2) operates as the holdings database for England, Wales and Scotland . AMLS2 and SAMS contain movement data for England and Wales and for Scotland, respectively.

The Animal & Public Health Information System (APHIS) database in Northern Ireland combines the registration of holdings and movements database with animal health functions.

A number of improvements have been made to AMLS2, including:

- delays in reporting movements to and entering data in AMLS2, noted during the previous mission, have been resolved;

- facilities to record additional holding register information as specified in point D of Annex to Regulation (EC) No 21/2004 e.g. species, occupation of the keeper, type of production, the result and date of the annual inventory and a data field for animal health information;
- a data cleansing exercise was carried out to verify that the register of holdings was complete and that redundant data was removed;
- in the case of movements of sheep and goats to NI, AMLS2 can now record the address of the holding of destination. Previously only the port of departure was entered.

APHIS has also been enhanced:

- the system has been adapted to record movement notifications instead of movement licence information;
- a system is in place to record and monitor movement restrictions applied to holdings;
- the result of the annual inventory information can be submitted online;
- holdings not actively involved in production are automatically marked as non-operational but remain registered for a minimum of three years.

Observations:

- although the CCA had planned to extend AMLS2 to cover the whole of GB, no deadline has been set to achieve this and the movement of sheep and goats in Scotland is still recorded on the separate SAMS database;
- no formal link between AMLS2 and APHIS has been established.

5.9. Controls on holding registration, animal identification and movement controls

In all regions, on-farm controls on sheep and goat identification (cross-compliance checks) are mainly carried out in the framework of controls on subsidies and with little involvement of the veterinary services. Checks on compliance with sheep identification requirements are included as part of these inspections.

The holding register and movement documents are inspected and the identification of a sample of the sheep on the holding is physically examined. This might increase to a 100% control in case of non-compliance.

The Local Authorities and DARD Veterinary Service also carry out official controls (see section 5.1). The majority of these controls consist of routine supervision activities in livestock markets and slaughterhouses. In addition, they perform some on-farm inspections, many of which are the result of a referral from the public or another Government department or agency (e.g. to investigate reports of non-compliance received from the public or another agency).

In England and Wales, the frequency of Local Authority inspection is determined according to a risk profile matrix agreed locally with the State

Veterinary Service. Enforcement activities carried out by Local Authority inspectors in England and Wales are recorded on the Animal Movement Enforcement System (AMES) database, to which both, the State Veterinary Service and Rural Payments Agency have access. In Scotland there is no computer database of enforcement activities equivalent to AMES. Instead, reports on enforcement activities are based on summaries provided from local authorities inspectors' records. In NI, the DARD Veterinary Service maintains a separate database of enforcement activities that it carries out.

Where deficiencies are detected during official controls, corrective measures are taken. This typically takes the form of advisory notes or warning letters. Less frequently, formal cautions may be issued and prosecutions are initiated. The CCA stated with reference to Article 10 of Regulation (EC) No 21/2004 that imposition of more direct sanctions has been deferred until EU legislation is in place.

Observations:

- in the regions visited, official controls had failed to detect most deficiencies identified during this mission e.g. on one farm visited in Wales numerous errors and omissions were found in the holding register. The register had recently been inspected by a Local Authority officer, who had failed to find any discrepancies. Official checks performed at a market visited in NI failed to identify a discrepancy in the number of animals that had arrived and the range of ear tag numbers recorded on the accompanying movement document;
- in GB, the number of sheep (if any) subjected to physical inspection is entirely at the discretion of the local authority officer. On another farm visited in Wales that had been recently inspected by a local authority officer the keeper declared that no sheep had been subjected to physical inspection;
- the risk evaluation carried out on a holding in one local authority office in Wales was not in accordance with the criteria laid down by DEFRA and, consequently, the holding was not listed for inspection during either 2004 or 2005;
- in previous years multi-agency exercises in GB involving the police and local authorities have been organised to check livestock during transport. Consignments of sheep stopped at roadside checkpoints were inspected for compliance with animal identification, movement control and animal welfare requirements. No exercise was carried out during 2005 but one is planned for 2006;
- as part of its response to the findings of the previous mission, the CA of NI introduced procedures for routine checking of movements to and from market holdings for every sale that is held. The team was given evidence of this.

5.10. Awareness and training

In GB, as well as in NI, keepers of animals received information about the changes to be expected before new legislation came into force by means of letters and publicity campaigns. In England and NI, keepers of animals also received explanatory notes, a holding register and movement documents, which include all information as laid down in Article 5 and Article 6 of Regulation (EC) No 21/2004 respectively.

5.11. Miscellaneous

The inspection team noted during visits to one livestock market and one slaughterhouse that biosecurity rules are not always respected:

- the pen for detained animals in the slaughterhouse was not separated in such a way as to properly isolate animals and their waste; and
- part of the market was not cleaned before the start of the market. The manager claimed that this part was not in use. However, a pen for sick sheep was allocated in this area.

Records could not in all cases be provided to prove that fallen animals on farm holdings and at a slaughterhouse were sent to an establishment approved according to the requirements of Regulation (EC) No. 1774/2002⁸.

6. CONCLUSIONS

6.1. Competent authority performance

The CCA has delegated responsibility for the implementation of Regulation (EC) No 21/2004 across several government departments and agencies. The responsibilities of each are clearly defined. Only in NI was evidence present of adequate controls and supervision of the work carried out on behalf of the CCA.

6.2. Legislation

Despite commitments from the CCA to the Commission to fully implement Regulation (EC) No 21/2004 by the end of October 2005, legislation entered into force only very recently in England and NI. Scottish legislation is expected to be in place early in 2006, while in Wales it is not expected until March 2006.

The models for holding registers and movement documents have been included in regional legislation drafted for the alternative tagging system as referred to in Article 1 of Commission Decision 2005/617/EC. Consequently, the implementation of Article 5 on the format and details for holding

⁸ Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption. Official Journal L 273, 10.10.2002, p.1

registers, and of Article 6 of Regulation (EC) No 21/2004 on the model and information on movement documents has been delayed.

The meaning given to the term 'holding' by the CA in GB and NI is not consistent with the definitions in Article 2 (b) of Regulation (EC) No 21/2004 and the replacement of the term 'holding number' by 'flock number' by the CA in NI is not consistent with the requirements of annex B and C of the Annex to Regulation (EC) No 21/2004.

6.3. Registration of holdings

Progress has been made to fulfil the requirements of Article 7 of Regulation (EC) No 21/2004. However, a central register of holdings for the UK has not yet been established.

6.4. Holding registers

The requirement to maintain a register on each holding, as stated in Article 3 of Regulation (EC) No 21/2004, is not met on holdings used for common or winter grazing. The holding registers on most holdings visited are not kept up-to-date, as required by Articles 3 and 5 of Regulation (EC) No 21/2004.

6.5. Animal identification

Animal identification requirements are generally understood and respected in the regions visited. However, the system to replace lost or illegible ear tags might jeopardise the tracing of animals particularly in cases where sheep from different natal holdings have lost their natal tag.

6.6. Movement controls

Many deficiencies were identified regarding the completion of movement documents, which might jeopardise the tracing of animals and the epidemiological investigation in the event of a disease outbreak.

6.7. Manufacturers of ear tags

Systems for authorisation and allocation of ear tags have been introduced which improve the controls on the manufacture and distribution of official ear tags.

6.8. Computer database

Improvements were noted regarding the computer database. However, as noted during the previous mission, formal links between the databases in GB and in NI have not been established.

6.9. Controls on holding registration, animal identification and movement controls

Controls on holding registration, animal identification and movement controls have been carried out. The system for official controls in place in the regions visited is not fully effective. Cross checks between the identification of animals, their movement documents and data in the holding registers were

rarely carried out. Where deficiencies are detected, sanctions imposed are not always effective and dissuasive.

6.10. Awareness and training

Keepers of animals, with a few exceptions, were generally aware of the new or proposed system of identification and registration. However, many examples were seen where keepers had failed to complete movement documents, to identify animals or to keep accurate holding registers in accordance with current regional requirements in place.

6.11. Overall conclusion

The commitment undertaken by the CCA of the UK to address concerns, and in particular to take necessary measures to ensure compliance with Regulation (EC) No 21/2004 within 10 weeks of the requested approval being granted as laid down in Commission Decision 2005/617/EC of 17 August 2005 has not been met.

There is, however, evidence that the system can satisfy the requirements of Article 4 (2) (c) of Regulation (EC) No 21/2004 once it is fully implemented.

7. CLOSING MEETING

A closing meeting was held on 16 December 2005 with the CCA and representatives of the regional CAs. At this meeting, the main findings and conclusions of the mission were presented by the inspection team. The representatives of the CAs took note of the main findings and conclusions.

8. RECOMMENDATIONS TO THE COMPETENT AUTHORITIES OF UNITED KINGDOM

- (1) To supervise the implementation of Regulation (EC) No 21/2004 more closely so as to ensure that the requirements are applied consistently and coherently in all regions.
- (2) To ensure that there is no further delay in the introduction of the regional legislation required to enforce the requirements of Regulation (EC) No 21/2004.
- (3) To review the procedures and rules concerning animals whose identification has become illegible or has been lost so as to ensure that their traceability is assured.
- (4) To ensure that official controls carried out on farms and other holdings are effective and that effective and dissuasive sanctions are imposed in cases where non-compliance is detected.

In this regard, an action plan with a timetable to address the conclusions and recommendations mentioned in the report should be forwarded to the Commission Services within one month of receiving the draft report.

ADDENDUM

In their response to the draft report, the authorities of the United Kingdom have provided initial assurances in relation to all but one of the recommendations of the draft report.