



EUROPEAN COMMISSION
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Opinion

Title

SANCO - Electronic identification of bovine animals and reducing administrative burden in animal passports, holding registers and beef labelling, revision of Regulation (EC) No 1760/2000

(resubmitted draft: version of 11 April 2011)

(A) Context

Regulation (EC) No 1760/2000 establishes a system for the identification and registration of bovine animals, such as cows and buffalo, and regulates the mandatory and voluntary labelling of beef and beef products. It strengthens earlier Regulation (EC) No 820/97. The regulation includes obligations relating to double ear tags, holding registers, cattle passports and national computerised databases. While bovine ear tags must bear an identifying code, the current EU rules do not regulate electronic tags for bovines (in contrast, such tags are required for sheep and goats and some other animals). The requirement is instead for manual registrations which are subsequently fed into a database. Some Member States have started to introduce electronic tags for bovines at national level on a voluntary basis.

(B) Overall assessment

Following revisions in line with the Board's previous opinion, the IA report now provides clearer information about the problem being addressed, the practical implications of the various options and how impacts vary by stakeholder group. However, certain aspects should be further improved. Firstly, the comparability of options and their overall impact should be more clearly presented through a table. Secondly, the practical implications of the preferred option 2A and differences that will result from the possibility of some Member states having a mandatory system for electronic tags should be further clarified. Finally, the readability of data tables should be improved, including through consistent recording of measurement units and sources.

(C) Main recommendations for improvements

(1) Further improve comparability via a table on total cost. The Board notes that the draft report has been improved in line with its previous Opinion and now provides analysis of impacts on a broader range of stakeholders. The report should further improve the presentation of these impacts, particularly economic impacts, by providing a summary

table listing (a) the estimated total cost of all official bovine recording tasks for options 1 and 3, and (b) the total cost in excess of the baseline level for option 3, in both cases for all actors across the EU. The costs of option 3 could be presented as a range reflecting the slight variations depending on whether electronic ear-tags or boluses are used. One or a few of the estimation scenarios could be presented for option 3 with a short title and linked explanation of why they are most likely (e.g. where only e-identification is taken up, or where e-reading is fully used). For option 2A, scenarios could be presented that differ in the number of Member States that are assumed to select mandatory electronic identification. A note should explain that a certain proportion of the costs might be compensated for by savings in non-official identification tasks, giving estimates on this if possible. The requested table should be added to the "comparison of options" chapter.

(2) Further clarify what option 2A involves. The newly added Table 3 helps to clarify what means of official identification would be permitted under each option. However it should be amended to further clarify that option 2A entails differing tagging approaches across the Union (namely, always tagging with one conventional and one electronic tag in Member States that voluntarily mandate this, but two coexisting styles of tagging in other Member States).

(3) Clarify the meaning of data tables. The tables should be amended to ensure that measurement units are clearly indicated (e.g. review tables 5-8, Annex XIX). An explanatory sentence should be added to table 1 in Annex VI to clarify which years it represents (e.g. confirm if this equates to "transitional approach" in table 8, hence cost for any year under extended transition or years 2 onwards under a one-off switchover). The source of the annexed tables should be indicated along with a few sentences on their reliability where they contain modelled data from the study.

(D) Procedure and presentation

The executive summary should be expanded to better explain the costs of each option by adding the summary cost table requested above. The text which has been added to the report would benefit from review to remedy minor spelling errors and improve the look of annexed tables. The key findings of the administrative burden analysis should be provided in an Annex using the format recommended in the IA guidelines.

(E) IAB scrutiny process

Reference number	2011/SANCO/004 (catalogue)
External expertise used	No
Date of IAB meeting	Written procedure The present opinion concerns a resubmitted draft IA report. The first opinion was issued on 31 January 2011.