

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

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The authors are scientists working on the epidemiology of livestock diseases such as foot and mouth disease and bovine tuberculosis. The authors are also part of Governance of Livestock Disease project, funded by the Rural Economy and Land-Use (RELU) programme, and are responding on behalf of the project. Livestock movement data, provided latterly via RADAR, have proved very valuable in enhancing our understanding of the spread of infectious diseases through the UK cattle and sheep herds, and have helped in the formation of evidence-based policy. It is our view that the epidemiological relevance of movement data should be considered in revising the livestock movement and holding identification rules.

We are grateful to John Bell for his interesting and informative seminar (16 June 2010) on the consultation proposals.

A review of livestock movement rules and holding identifiers in England is to be welcomed. As academic researchers who use the data, and are studying the governance of livestock disease, this system is core to our interests. Ensuring cattle movement recording is simplified and records systematized is a positive step, but such a step needs to be viewed as a means of achieving the objectives of livestock disease governance.

We have addressed specific questions below, but have not responded to those questions that are outside of our expertise and knowledge.

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

Whilst the efforts to simplify the systems for identification of land and animals and their relative positions are very welcome to both research and disease control communities, there will still be anomalies and awkward behaviours. However, a critical concept is consistency of information both with historic records (since cattle recorded in the current system will potentially inhabit the new system for 10 years) and within the new system. The quality of the data collected determines its usefulness generally; this is particularly true in the case of researchers that wish to analyse the data. Additionally, to maximise its usefulness, the information should be consistent with other sources of data, particularly from epidemiological sources such as the VETnet incidence databases.

## **2 Views are invited on the use of place of business as the point for measuring the 10 miles radius**

The recording aspect has four components: animal identity, animal ownership, animal location and premise/land ownership. These should be considered as (almost) separate aspects. Much of the confusion in the current system is because these have become conflated. Designating the “place of business” as a reference point for animal location means that ownership of land,

ownership of livestock, *and* location are presumed to be at least related. This is probably true for a large proportion of livestock, but there is also considerable variation from this assumption, particularly where short-term lets of grazing land are used.

### **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**

A circle of radius 10 miles is over 800 km<sup>2</sup>, or around  $\frac{1}{300}$  of the area of the UK. If there is to be any clear idea of where livestock actually are, then at the very least data need to be collected (and made available for research purposes) on where within these large areas land belonging to particular holdings lies. John Bell spoke of a GIS-based CPH viewer application which was under development, although there is no mention of this in the consultation document itself.

There is no proposal to require keepers to have a record of movements between land parcels within their 800 km<sup>2</sup> circle. In the event of an outbreak of a highly transmissible disease such as FMD, we are concerned that this will result in substantial uncertainty as to where animals actually are. We suggest that consideration be given to requiring keepers to maintain an up-to-date record of which land parcel individual animals are on (or, at the very least, the number of animals of each species on each land parcel).

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

Given our concerns as to the size of the proposed circles, we are in favour of the proposal to require separate CPH numbers for land beyond a holding's 800 km<sup>2</sup> circle. We are concerned, however, that the centre-point of a holding is currently rather vaguely defined, and that this will result in the centre-point being moved such as to maximise the number of separate land parcels that may be counted within a single CPH number. This would have the effect of increasing uncertainty about the location of livestock.

### **... (c) Commons**

We are pleased that commons will finally be part of the livestock movement controls; the mixing of livestock on common grazing land is clearly epidemiologically important, and the lack of any data about this has been a significant problem in the current system. Whilst we would be in favour of movements to and from commons becoming reportable (whilst not inducing a standstill period), we appreciate this may be impolitic.

### **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.**

We believe that CTS Links and SOAs have added complexity to the movement reporting system, and that creative uses of these facilities by a minority of keepers have resulted in some long-range livestock movements going unreported. We are pleased that they are to be abolished.

### **9. Views are invited on the proposals for permanent sheep and goat movement reporting arrangements**

It will be good to have a standardised regime for livestock movement reporting between the different species, although it is not clear if the practicalities of individually identifying sheep when they are being moved in large numbers have been fully addressed.

## Other remarks

1. The livestock movement data collected over the last decade remain a substantial and significant epidemiological resource. We are concerned that the re-structuring of CPH numbers will make it impossible to compare movement records from before and after the change. It is important that a mapping between “old” CPH numbers and “new” numbers is prepared, therefore. It is also crucial that the new system is consistent with other sources of data such as VETnet.
2. One of the problems in the current system is that the vendor and buyer of cattle both report “half-movements”, i.e. the vendor reports an animal leaving their holding, and the buyer reports the animal arriving on their holding. Errors in these records (whether from the keepers themselves, or when the records are entered into BCMS) can result in significant uncertainties in the movement histories of animals. We suggest consideration be given to requiring keepers (and/or markets) to report entire movements, rather than half-movements.
3. We would like to see a clearer proposal for how the new movement records, CPH records (including the detailed GIS-based data on land parcels), and temporary CPH details will be stored and made available; both for epidemiological research, and to enable rapid and accurate data on livestock locations to be used in the event of a disease outbreak.
4. We note that the proposed changes are to apply to England only. We understand that the Scottish Government has recently proposed its own changes. Given that the United Kingdom is essentially a single entity from an epidemiological viewpoint, we urge that due consideration is given to ensuring that the system and the data are consistent, and that we are not witnessing the development of divergence that will further complicate, rather than simplify.
5. Animal movement is a major process that disseminates infection (and therefore disease) and enables many infections to persist in the UK herd. It is central to the reasons that farmers do not have the incentive to eliminate infection / disease from their herds. This issue is well put in the current Scottish Government consultation on the elimination of Bovine Viral Diarrhoea Virus<sup>1</sup>. If farmers are to become more responsible for the health and welfare of their livestock, that responsibility has to extend beyond their immediate ownership. At present, the basis of animal movement / purchase is “buyer beware”; if farmers had some liability for the health of animals they had sold, then there would be increased incentive to improve health. Defra might wish to consider including some aspects of health information on livestock passports or within the identification systems; for example, vaccination status and TB status (that could be updated by vets to ensure accuracy of information). If Defra created, managed, and ensured an information system it would then become reflected in market prices for livestock, i.e. providing an economic incentive for improved health. The impact of such information sharing can be seen in the pig industry and the recent Eastern Pig Health scheme in which information dissemination is a key aspect<sup>2</sup>.

Whilst this suggestion is beyond the scope of the current revision of the system, we hope that it might be considered for future changes.

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<sup>1</sup><http://www.scotland.gov.uk/Resource/Doc/313847/0099571.pdf>

<sup>2</sup><http://www.thepigsite.com/swinenews/23987/pig-health-programme-takes-off-status-revealed>

6. Animal movement imposes (hidden) costs in terms of animal health, animal welfare and energy. Reducing the amount of animal movement would certainly be very beneficial to the control of most infectious diseases. Defra should consider the possibility of developing an animal movement reporting system that would permit a levy, perhaps in place of a per head levy, as a means to raise funds for the cost-sharing aspect of responsibility and cost sharing. Certainly, it would make sense for a movement levy to at least pay for the recording system. Whilst this proposal is likely to be seen by the livestock industry as imposing additional burdens on animal keepers, we believe that it represents a potentially good solution to multiple problems. We look forward to reading the draft Treasury bill that lays down the legal framework to support the cost element of responsibility and cost sharing.
7. Defra should make every attempt to demonstrate the potential benefits to animal health, animal welfare and animal productivity of central recording of animal identity, ownership and location. If the livestock industry came to view the system as an advantage (rather than an administrative burden) then they would be more likely to pay for it. This places some responsibility on Defra to ensure that the system is functional and useful to industry, and to resist industry pressure to reduce short-term costs. There are more long-term benefits to having a “good” system that facilitates and enables improved health, welfare and productivity.