

UNITED KINGDOM
CATTLE EARTAG MANUFACTURERS/SUPPLIERS
CODE OF PRACTICE

Introduction

BCMS ETAS Support team is part of the Department for Environment, Food & Rural Affairs (Defra), & is responsible for approving all official cattle ear tags under the Cattle Identification Regulations 1998 on behalf of the Agriculture Departments in England, Scotland and Wales. Approved ear tags must conform to the specifications as set out in Commission Regulation (EC) No 911/2004.

ETAS is the responsibility of the British Cattle Movement Service (BCMS) at Workington. If you require any further information about ETAS you can write to the **ETAS Support, BCMS, Curwen Road, Workington, Cumbria CA14 2DD. Tel: 01900 702120.**

In Northern Ireland the Department of Agriculture and Rural Development (DARD) is responsible for the approval of official cattle ear tags. The ear tag manufacturer must also demonstrate that tags supplied to herd keepers in Northern Ireland comply with the requirements of the Cattle Identification (No2) Regulations (Northern Ireland) 1998. To be granted full approval all ear tags must have passed PAS 44:2009 testing.

Publicly Available Specification, PAS 44:2009 is the standard that all cattle ear tags must be testing against to be approved for official cattle identification. PAS 44:2009 was notified to the European Commission in accordance with the Technical Standards Directive 98/34/EC, as amended by Directive 98/48/EC.

The tests required under PAS 44:2009 must be carried out in a Laboratory accredited by UKAS to ISO 17025 (**see Note 1**). This Code of Practice has been drawn up to ensure that all suppliers of official cattle ear tags conform to the same standards. All suppliers of official cattle ear tags will be required to confirm in writing their agreement to operate in accordance with this code of practice.

When an ear tag is approved for official cattle identification purposes, the tag may be sold to cattle keepers for official use, and orders for the tag may be entered onto the official government computers called ETAS in GB & APHIS in NI. These allocate the unique identification code (see below for further information).

1. APPLICATIONS FOR EARTAG APPROVAL FOR OFFICIAL CATTLE IDENTIFICATION PURPOSES

(i) Applications for final approval for cattle ear tags must be accompanied by a report from an independent laboratory confirming that the ear tag complies fully with PAS 44:2009. See '**Guidance Notes on Application for Approval of Cattle Ear tags.**' Before ear tags are submitted for PAS testing they should have undergone a satisfactory welfare assessment.

2. IN THE UNITED KINGDOM:

2(a) IN GREAT BRITAIN CATTLE EARTAG MANUFACTURERS/SUPPLIERS MUST COMPLY WITH THE ETAS USER INSTRUCTIONS' AND MUST ENSURE THAT ALL ORDERS ARE ACCURATELY LOGGED, AND THAT ALL REQUESTS FOR REPLACEMENT TAGS ARE ENTERED ONTO ETAS

(i) The Ear tag Allocation System (ETAS) is a government controlled computer system, which allocates the unique individual code for official cattle ear tags. ETAS is also used to monitor tag performance. Good quality information is essential to ensure that any potential problems can be identified and resolved as fast as possible. Poor quality information will only hinder resolution of problems, and in serious cases may lead to the manufacturer being de-listed and blocked from ETAS.

(ii) Suppliers of approved cattle ear tags must:

- have the requisite computer hardware to enable them to be linked to the Ear Tag Allocation System (ETAS). The issue of official ear tags is controlled through ETAS. This is the central database from which manufacturers are given the next number available in a farmer's series to meet the order for new tags.
- agree to abide by the rules of ETAS. In the event of any misuse of the system, the Agriculture Departments reserve the right to withdraw approval of all ear tags and applicators produced by the company.
- allow the audit of their work in ETAS by Government inspectors.

2(b). IN NORTHERN IRELAND MANUFACTURERS/SUPPLIERS MUST OBTAIN DARDNI AUTHORISATION (EITHER IN WRITING OR ELECTRONICALLY) BEFORE MANUFACTURING OR SUPPLYING EARTAGS TO KEEPERS.

- DARD monitors the performance of tags supplied in Northern Ireland. The approval to supply ear tags may be withdrawn where serious quality defects occur. Manufacturers must facilitate audit of their systems by DARD.

- The issue of official ear tags is controlled through APHIS, the central cattle database in Northern Ireland.
- APHIS is the responsibility of the Department of Agriculture and Rural Development in Belfast. If you require any further information about APHIS you can write to the APHIS Development Manager, Veterinary Service, Upper Newtownards Road, Belfast, BT4 3SB.

3. MANUFACTURERS/SUPPLIERS OF CATTLE EAR TAGS APPROVED FOR OFFICIAL USE MUST NOT MANUFACTURE OR SUPPLY A MODIFIED TAG DESIGN WITHOUT PRIOR APPROVAL FROM THE UK AGRICULTURE AUTHORITIES

(i) Only approved cattle ear tags can be sold or supplied for official use. The UK Agriculture Authorities must be informed of **any** alteration or modification, however minor, to approved designs, and approval of the modified design must be given by Defra and/or DARD before the tag can be sold or supplied. A decision on whether to require the modified design to be submitted for laboratory testing under PAS 44:2009 will be given by the relevant Agriculture Authority. Modified tags that are found to have been placed on the market without prior approval will be withdrawn from the approved list pending discussion with the manufacturer/supplier.

(ii) Suppliers of approved cattle ear tags should:

- agree to submit tag modifications to Defra (ETAS Support team at BCMS) for approval in advance of placing the modified tag on the market. Failure to do so will result in the tags approval being withdrawn by the relevant Agriculture Authority.

4. CATTLE EAR TAG MANUFACTURERS/SUPPLIERS TO SUPPLY REPLACEMENTS OF DEFECTIVE TAGS FREE OF CHARGE

(i) Keepers buy tags in good faith. The UK Agriculture Authorities consider that replacements of tags with a manufacturing default should be provided to the keeper without charge.

(ii) Suppliers of approved cattle ear tags must:

- Agree to provide replacements of defective ear tags free of charge; and

5. CATTLE EAR TAG MANUFACTURERS/SUPPLIERS TO SUPPLY INITIAL ORDERS FOR OFFICIAL CATTLE EARTAGS WITHIN 21 DAYS OF PAYMENT BEING RECEIVED

(i) The UK Agriculture Authorities believe that a guarantee of delivery within 21 days is a reasonable standard to apply to all initial orders. Keepers abide to requirements by European legislation to tag animals within certain time periods, and in order to ensure their capacity to conform to this legislation,

they should be able to order tags and ensure receipt of them within a guaranteed time scale. In the event that suppliers are unable to comply with the 21 day limit, DEFRA and/or DARD may require outstanding orders to be passed to an alternative supplier. In the event that production is switched to an alternative supplier it will be the company's responsibility to come to a commercial decision about the supply of an alternative applicator if this is required.

(ii) Suppliers of approved cattle ear tags should:

- Supply initial orders for ear tags within 21 days of payment of the order being placed; and
- Notify DEFRA and/or DARD in the event that a backlog occurs and the 21 day limit is breached.

Packaging and delivery

Suppliers of approved cattle ear tags must:

- Agree that the packaging pins of cattle ear tags should be individually protected or otherwise packed to prevent injury when handling the package.

6. CATTLE EAR TAG MANUFACTURERS/SUPPLIERS TO SUPPLY REPLACEMENTS WITHIN 7 DAYS OF PAYMENT BEING RECEIVED

(i) A similar guarantee to (5) above should also apply to replacement ear tags. Domestic legislation requires farmers to replace tags within 28 days of the discovery of any losses, consequently we need to ensure that farmers are able to receive replacement tags swiftly so they are not struggling to achieve this deadline.

(ii) Suppliers of approved cattle ear tags should:

- Agree to provide replacement ear tags (unless there is a dispute as to whether the ear tag/s should be replaced free of charge) within 7 days of payment of the order for a replacement ear tag being placed.

7. CATTLE EAR TAG MANUFACTURERS/SUPPLIERS MUST SUPPLY INSTRUCTIONS FOR INSERTION OF TAGS AND THE BEST TAGGING PRACTICE LEAFLET WITH ALL STANDARD ORDERS AND REPLACEMENT ORDERS

(i) There is evidence that at least some of the tag retention problems are due to incorrect insertion of the tag in the beginning. Suppliers should ensure that their detailed product literature includes information provided by Defra on best tagging practice. All ear tags and applicators must be supplied with

instructions for the insertion of the tags, including pictorial details of the positions in the animal's ear in which the tag is to be placed.

(ii) Suppliers of approved cattle ear tags should:

- Agree to submit in advance of tag approval the product literature which the supplier intends to supply with the ear tags for consideration by Defra.
- Agree to submit a copy of any proposed alterations to the agreed product literature to Defra and/or DARD for consideration.
- Agree to provide the instructions agreed with Defra and/or DARD for the tag being supplied with each order and replacement order.

9. EAR TAG MANUFACTURERS/SUPPLIERS TO ABIDE BY ADVERTISING STANDARDS

(i) Publicity material should not incorporate any reference to Defra or the crown or DARD logo without prior approval, except when mentioning that a particular ear tag has Defra and/or DARD approval, if that is the case. ETAS data on tag loss rates must not be used for publicity purposes. Any manufacturer/supplier of official cattle ear tags wishing to cite loss rates must use their own statistics and be able to produce supporting data to endorse these claims if requested to do so by Defra and/or DARD.

(ii) Suppliers of approved cattle ear tags should:

- Refrain from the use of the crown or DARD logo in all advertising material (apart from a depiction of the crown or DARD logo in a example tag on literature).
- Agree not to refer to Defra and/or DARD in any advertising material, except when indicating that an eartag has been approved by Defra and/or DARD, if that is the case.
- Refrain from using official ETAS statistics in advertising material.

10. MONITORING OF TAG PERFORMANCE ON ETAS

(i) Cattle ear tags which have a loss rate in excess of an acceptable limit will be deemed to be performing at an unacceptable level.

(ii) Defra (ETAS Support at BCMS) will monitor the performance of each approved tag using data produced by ETAS and field reports. ETAS reports will be produced to monitor tag replacement rates on a quarterly basis. If the

performance of a tag falls below an acceptable limit, the supplier will be notified in writing and given an opportunity to discuss and rectify the problem. Where replacement rates exceed the acceptable limit the Department may undertake further investigation or suspend or withdraw approval of the tag. Where suspension or withdrawal is recommended, Defra will notify the supplier in writing giving them the opportunity to appeal against the decision. All appeals against withdrawal must be lodged with Defra within 14 days of the written notification. However, the final decision will rest with Defra in GB, or Dard in NI.

(iii) Suppliers of approved cattle ear tags should:

- Immediately inform Defra of any situation which may affect the performance of an approved ear tag (e.g. manufacturing problem).

11. PRINTING, EMBOSSING OR MARKING OF EARTAGS

Ear tags which have not met the PAS 44:2009 criteria must not be printed, embossed or otherwise marked with this information.

12. ANNUAL MONITORING / FUTURE POTENTIAL FOR USE OF KITEMARK

(i) Following final approval of an ear tag for official cattle identification purposes, an ear tag manufacturer/supplier can apply for the British Standards Institute (BSI) “Kitemark” scheme. The process of obtaining such recognition involves an annual inspection of the manufacturing process at the manufacturing plant/premises. This procedure can only be carried out by BSI and will involve checks and monitoring to ensure that the tags being manufactured still meet the original performance tests and are being manufactured to exactly the same specification as was passed by PAS 44: 2009. If the tag and the manufacturing process meet the standard then BSI may award their “Kitemark” which can be displayed on advertising material to promote the tag in practice. The symbol may also be embossed onto the inside of a plastic or metal tag.

13. DE-LISTING OF TAGS

(i) Failure by an ear tag manufacturer/supplier to comply with the Code of Practice may result in their approved tags being removed from the official list.

Note 1: ISO 17025 is an international standard for the general requirements for the competence of testing and calibration laboratories. Details of laboratories accredited to ISO 17025 will be found on the United Kingdom Accreditation Service (UKAS) Website at www.ukas.com or from UKAS, Feltham, Middlesex TW13 4UN Tel: 020 8917 8400 (email info@ukas.com).

ETAS Support
April 2010

Annex A: Manufacturer / Supplier Undertaking

.....
(Insert full name & position in company), agree that

.....(insert name of company) will operate in
accordance with the UNITED KINGDOM, CATTLE EARTAG
MANUFACTURERS/SUPPLIERS CODE OF PRACTICE

Signed by:.....

Print Name:.....

Company Name and
Address:.....

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.....

Please complete and return this form to:
The Team Leader
ETAS Support
BCMS, Curwen Road
Workington
Cumbria
CA14 2DD
ENGLAND