

# Great Britain Sheep and Goat Ear Tag Manufacturers/Suppliers Code of Practice

# **Great Britain Sheep and Goat Ear Tag Manufacturers/Suppliers Code of Practice**

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EID Technical Guidelines Part 2	1.0	
ISO 17025	2 <sup>nd</sup> edition	
Guidance Notes on Application for Approval of Official Eartags		

# Contents

<b>1</b>	<b>INTRODUCTION.....</b>	<b>5</b>
<b>2</b>	<b>GENERAL REQUIREMENTS.....</b>	<b>6</b>
2.1	APPLICATIONS FOR APPROVAL FOR SHEEP AND GOAT IDENTIFICATION PURPOSES.....	6
2.2	MANUFACTURERS/SUPPLIERS MUST COMPLY WITH THE ETAS USER INSTRUCTIONS AND MUST ENSURE THAT ALL ORDERS ARE ACCURATELY LOGGED ....	6
2.3	MANUFACTURERS/SUPPLIERS MUST SPECIFY THE TYPE OF IDENTIFIER BEING ORDERED .....	7
2.4	MANUFACTURERS/SUPPLIERS MUST ENSURE ELECTRONIC EAR TAGS AND BOLUSES READ CORRECTLY.....	8
2.5	MANUFACTURERS/SUPPLIERS MUST NOT ISSUE EAR TAGS OR BOLUSES WITH DUPLICATED IDENTIFICATION NUMBERS.....	8
2.6	MANUFACTURERS/SUPPLIERS OF EAR TAGS AND BOLUSES APPROVED FOR OFFICIAL USE MUST NOT MANUFACTURE OR SUPPLY A MODIFIED DESIGN WITHOUT PRIOR APPROVAL FROM THE CA.....	9
2.7	MANUFACTURERS/SUPPLIERS TO DESPATCH INITIAL ORDERS FOR OFFICIAL EAR TAGS OR BOLUSES WITHIN 21 DAYS OF PAYMENT BEING RECEIVED.....	9
2.8	MANUFACTURERS/SUPPLIERS TO DESPATCH REPLACEMENTS WITHIN 7 DAYS OF PAYMENT BEING RECEIVED .....	10
2.9	MANUFACTURERS/SUPPLIERS MUST SUPPLY INSTRUCTIONS FOR INSERTION OF TAGS AND BOLUSES, BEST TAGGING PRACTICE LEAFLET AND INFORMATION ON THE COMPLAINTS/COMMENTS FORM WITH ALL STANDARD AND REPLACEMENT ORDERS .	10
2.10	MANUFACTURERS/SUPPLIERS TO ABIDE BY ADVERTISING STANDARDS .....	11
2.11	SUPPLY OF ETAS INFORMATION.....	11
2.12	ANNUAL MONITORING/FUTURE POTENTIAL FOR USE OF KITEMARK.....	11
2.13	COMPANY AUDIT .....	12
<b>3</b>	<b>SPECIFIC EAR TAG OR BOLUS REQUIREMENTS .....</b>	<b>12</b>
3.1	MANUFACTURERS/SUPPLIERS TO SUPPLY REPLACEMENTS FOR DEFECTIVE TAGS FREE OF CHARGE.....	12
3.2	TRANSPONDER CODING .....	12
3.3	DESPATCH OF BOLUSES .....	13
3.4	PRINTING, EMBOSING OR MARKING OF EAR TAGS .....	13
3.5	USE OF RESERVED EAR TAG COLOURS.....	13
	<b>ANNEX A: MANUFACTURER/SUPPLIER UNDERTAKING .....</b>	<b>16</b>

# 1 Introduction

The British Cattle Movement Service (BCMS) ETAS Support is part of the Rural Payments Agency (RPA), and is responsible for approving all sheep and goat ear tags (both electronic and non-electronic) and electronic boluses for the Competent Authorities (CA's) in England, Scotland and Wales, i.e. Great Britain. Approved ear tags and boluses must conform to the specifications as set out in Council Regulation (EC) No 21/2004.

When an eartag or bolus is approved for official sheep and goat identification purposes they may be sold and supplied to keepers for official use. From 7 September 2009 orders for tags and boluses must be entered onto the re-launched official government computer system called ETAS (Eartag Allocation System), which allocates the unique identification codes.

Publicly Available Specification, PAS66:2009, "Official identification eartags for sheep and goats – Specification" provides the standard by which **all** ear tags are to be approved for official sheep and goat identification purposes and must be measured before they may be approved for sale and supply to keepers. In addition, all **electronic** ear tags/boluses must be satisfactorily tested against the requirements of the EID Technical Guidelines Part 2<sup>1</sup> before being approved for sale and supply to keepers. The tests required under PAS 66:2009 and EID Technical Guidelines must be carried out in a laboratory accredited to ISO 17025<sup>2</sup> by a notified body operating under ISO/IEC 17011 and 17040. Identifiers (electronic and non-electronic) which have passed PAS66:2009 and EID Technical Guidelines Part 2 testing will be published on the [RPA website](#).

This Code of Practice has been drawn up to ensure that all suppliers of official sheep and goat ear tags and boluses conform to the same standards. This Code of Practice replaces any and all previous Codes of Practice with the same title, which should no longer be referred to.

All suppliers of official ear tags and boluses will be required to confirm in writing their agreement to operate in accordance with this Code of Practice – see Annex A.

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<sup>1</sup> Technical Guidelines for Council Regulation (EC) No 21/2004

<sup>2</sup> 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 can be found on the United Kingdom Accreditation Service (UKAS) Website at [www.ukas.com](http://www.ukas.com) or from UKAS, Feltham, Middlesex TW13 4UN Tel: 020 8917 8400 (email [info@ukas.com](mailto:info@ukas.com)).

## **2 General Requirements**

### **2.1 Applications for approval for sheep and goat identification purposes**

Applications for final approval for sheep and goat ear tags must be accompanied by certification confirming that the ear tag complies fully with PAS 66:2009 and (if appropriate) the EID Technical Guidelines Part 2. Applications for final approval for sheep and goat boluses must be accompanied by certification confirming the bolus complies fully with the EID Technical Guidelines Part 2. See '*Guidance Notes on Application for Approval of Official Eartags*'.

### **2.2 Manufacturers/suppliers must comply with the ETAS user instructions and must ensure that all orders are accurately logged**

From 7 September 2009, the revised Sheep and Goats ETAS is the centralised computer system, which allocates unique individual codes for official sheep and goat ear tags and boluses for Great Britain. ETAS will also be used to monitor the distribution of tag/bolus sales and will help to ensure that keepers are conforming to the requirements. 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.

Suppliers of approved ear tags and boluses must:

- be aware of their responsibilities to their customers by ensuring, as much as possible, that they are aware of the requirements of the legislation.
- have the requisite computer hardware to enable them to be linked to the Sheep and Goats ETAS. The issue of official ear tags and boluses will be controlled through ETAS. This will be the central database from which manufacturers will be given the next number available in a keeper's series to meet the order for new tags/boluses or replacement identifiers.
- agree to abide by the rules of ETAS. In the event of any misuse of the system (including not correctly allocating orders, not inputting orders, or providing false or misleading information), the appropriate CA reserves the right to withdraw approval of all ear tags/boluses and applicators produced/supplied by the company.
- allow the audit of their work in ETAS by CA inspectors and EC officials.

Sheep and Goats ETAS is operated by the British Cattle Movement Service (BCMS) at Workington on behalf of Defra, Scottish Government and Welsh Assembly.

If you require any further information about ETAS you can write to the BCMS ETAS Support, BCMS, Curwen Road, Workington, Cumbria, CA14 2DD. E-mail: [ETAS.SectionBCMS@rpa.qsi.gov.uk](mailto:ETAS.SectionBCMS@rpa.qsi.gov.uk)

### **2.3 Manufacturers/suppliers must specify the type of identifier being ordered**

With the introduction of electronic identification (EID), there are now a number of different identifier types listed on ETAS. These cover a wide range of identification purposes, so it is important that tags and boluses are issued according to their intended purpose. Specifying the identifier type will determine the correct number format to be printed/encoded onto the identifier, e.g. a slaughter tag (whether electronic or not) will only need to have 'UK' plus the flock mark printed on it, whereas a set of EID ear tag plus matching visual ear tag will need the full animal identification number printed on it.

At time of ordering, the manufacturer/supplier should discuss with keepers, or agents working on behalf of the keepers, what tags can and cannot be sold for official EID purposes and associated issues, e.g. an animal should not have two electronic identifiers applied (whether official or not)<sup>3</sup>, and that using electronic slaughter tags can cause the numbers allocated to electronically identified animals to become out of sequence (i.e. individual identification numbers are used up even though they are not printed on the slaughter tag).

Manufacturers/suppliers that receive orders via the Internet should ensure that their website includes information where keepers can obtain further information on the tags including where the feedback/complaint form can be obtained.

Suppliers should also discuss the replacement provisions with customers so that they understand the need to maintain a supply of red replacements, where appropriate.

Suppliers of approved ear tags and boluses should:

- Ask the keeper (or agent working on behalf of the keeper) , the use for the tag or bolus being ordered to ensure it is a valid option/format.
- clearly state what the identifier type is when supplied to keepers.

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<sup>3</sup> It is recognised that some animals may already have an electronic bolus applied as part of scrapie monitoring and this may raise an issue should the keeper wish to electronically identify these animals.

## **2.4 Manufacturers/suppliers must ensure electronic ear tags and boluses read correctly**

It is relatively easy to check that non-electronic ear tags have been printed with the correct number before despatch from the supplier. Keepers will also be able to check on receipt that their ear tags display the right numbers. However, it is more difficult for keepers to check their electronic ear tags or boluses contain the correct number or read. As keepers are not compelled to have an electronic reader they may not be able to check their identification device reads upon receipt.

Suppliers of approved electronic ear tags and boluses must:

- be accredited to ISO 9000, or put in place a suitable QA process to read electronic ear tags and boluses before despatch to the keeper to ensure they read.

## **2.5 Manufacturers/suppliers must not issue ear tags or boluses with duplicated identification numbers**

Sheep and goats must be uniquely identified to ensure full traceability. ETAS has been designed not to issue duplicate numbers once they have been issued, other than for re-tagging purposes, in which case there is a specific identifier type for the supplier to select when placing orders. If this is a re-tag with the same individual identification number, then the re-tag counter part of the full identification number recorded on ETAS will need to be increased by '1' to identify the order as a like-for-like replacement. In the case of electronic identifiers, the re-tag counter coded on the transponder will also need to be increased to show the re-tag number of the individual number being replaced. The re-tag counter has a maximum value of '7', thereby meaning that an individual animal can be re-tagged with the same number up to seven times. At the 7<sup>th</sup> replacement, ETAS will issue a warning and the animal will then need to be re-identified with a new individual number and returning the re-tagging counter to '0'. It is important that suppliers do not provide tags or boluses with an identification number which has already been allocated to a different animal.

Suppliers of approved ear tags and boluses must:

- be accredited to ISO 9000, or put in place a suitable QA process to ensure ear tags and boluses are not provided with duplicate numbers either printed on them or coded into the electronic chip.



## **2.6 Manufacturers/suppliers of ear tags and boluses approved for official use must not manufacture or supply a modified design without prior approval from the CA**

Only approved ear tags or boluses can be sold or supplied for official use. The CA must be informed of **any** alteration or modification, however minor, to approved designs, and approval of the modified design must be given by the competent authority before the tag/bolus can be sold or supplied. A decision on whether to require the modified design to be submitted through the approval processes will be given by the competent authority dependant on the significance of the modification. Modified tags/boluses 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.

Suppliers of approved ear tags and boluses must:

- agree to submit modifications to BCMS for approval in advance of placing the modified identifier on the market. Failure to do so will result in the approval being withdrawn by the CA.

## **2.7 Manufacturers/suppliers to despatch initial orders for official ear tags or boluses within 21 days of payment being received**

The CA believes that a guarantee of delivery within 21 days is a reasonable standard to apply to all initial orders. Obviously, there may be occasions where this delivery timescale cannot be achieved due to circumstances beyond the control of the manufacturer/supplier (e.g. post strike). If this were to occur, it would be reasonable to allow a longer delivery time, dependant on the individual circumstances. Keepers face requirements from European legislation to identify animals within certain time periods, and in order to ensure their capacity to conform to this legislation, they should be able to order tags/boluses and ensure receipt of them within a guaranteed time scale. In the event that suppliers are unable to comply with the 21 day limit, it may be necessary to pass outstanding orders 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.

Unless different delivery terms have been specifically agreed, suppliers of approved ear tags and boluses must:

- despatch initial orders for ear tags or boluses within 21 days of the order being placed where possible, unless payment is not received.

- notify BCMS by e-mail in advance of any cases where the 21 day limit is likely to be breached.
- in the event that a backlog occurs and the 21 day limit is breached, notify BCMS immediately by e-mail.

Suppliers should take appropriate steps to ensure tags and boluses are delivered in a safe manner, without damage.

## **2.8 Manufacturers/suppliers to despatch replacements within 7 days of payment being received**

A similar guarantee to 2.7 above should also apply to replacement ear tags and boluses.

Suppliers of approved identifiers should, under normal circumstances, endeavour to:

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

## **2.9 Manufacturers/suppliers must supply instructions for insertion of tags and boluses, best tagging practice leaflet and information on the complaints/comments form with all standard and replacement orders**

There is evidence that at least some of the tag/bolus retention and welfare problems are due to incorrect insertion of the identifiers. Suppliers should ensure that their detailed product literature includes information provided by Defra/BCMS on best tagging practice. All ear tags, boluses and applicators must be supplied with instructions for their insertion/use, including pictorial details of the positions in the animal's ear in which the tag is to be placed. It is accepted that suppliers have no control over the end-user actually complying with their instructional literature.

Suppliers of approved identifiers must agree to:

- submit in advance to BCMS the proposed "how to apply" literature which the supplier intends to supply with the ear tags and boluses. This must include reference to Defra recommendations on best tagging practice and information on where the BCMS complaints/feedback form can be obtained from. BCMS will provide feedback on the proposed product information [within 28 days of receipt] and may request changes; provide

- the agreed product information for the tag or bolus supplied with each order of new tags (excluding replacement tags); and
- resubmit product information to BCMS for consideration when alterations are made to the previously agreed product information.

## **2.10 Manufacturers/suppliers to abide by advertising standards**

Publicity material should not incorporate any reference to Defra, Scottish Government, Welsh Assembly or the crown without prior approval, except when mentioning that a particular ear tag or bolus has approval for the purposes of official identification. The ETAS team will carry out dip checks on websites etc. to make sure this is being adhered to.

## **2.11 Supply of ETAS information**

Where not subject to Freedom of Information legislation, suppliers of approved ear tags and boluses must:

- agree to release any data on replacement levels should they ever be considered useful to the CA or industry.
- agree that information held on ETAS may be released where appropriate to interested organisations where it is considered the information is useful.

## **2.12 Annual monitoring/future potential for use of kitemark**

Following final approval of an ear tag or bolus for the purpose of official identification, a manufacturer/supplier may consider applying for the British Standards Institute (BSI) “Kitemark” scheme. This application is voluntary and there is no compulsion for manufacturers/suppliers to follow this route. 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 identifiers being manufactured still meet the original performance tests and are being manufactured to exactly the same specification as was passed by PAS 66: 2009 (if appropriate) and the EID Technical Guidelines Part 2. If the identifier and the manufacturing process meet the standard, then BSI may award their “Kitemark” which can be displayed on advertising material to promote the tag/bolus. The symbol may also be embossed onto the inside of a plastic or metal tag or otherwise indicated on a bolus.

## 2.13 Company audit

Companies which have been granted permission to supply approved identifiers may be subject to an audit. The requirements of any audit are currently being considered. In the meantime, suppliers should:

- agree to provide necessary assistance in support of an audit;
- be able to demonstrate that their company is meeting the requirements of this code.

## 3 Specific Ear Tag or Bolus Requirements

### 3.1 Manufacturers/suppliers to supply replacements for defective tags free of charge

Keepers buy tags in good faith. The CA's consider that replacements of tags with a manufacturing fault, which renders the tag unfit for use, should be provided to the keeper without charge.

Suppliers of approved ear tags must:

- agree to provide replacements of defective ear tags free of charge.

### 3.2 Transponder coding

Transponders in electronic identifiers (ear tags or boluses) must be coded in accordance with the requirements set out in the EID Technical Guidelines Part 2. The code structure is laid out in paragraph 2 of these guidelines and a brief explanation is set out in the table below:

Bit(s) no.	No. of digits	No. of combinations	Description
1	1	2	Indicates whether the transponder is used for animal identification or not. In all animal applications this bit shall be <b>1</b>
2-4	1	8	Retagging counter ( <b>0 to 7</b> )
5-9	2	32	User information field. <b>Must</b> be used as a species code indicator, i.e. <b>04</b> for sheep & goats
10-15	2	64	Empty - all zeros (reserved for future applications)
16	1	2	Indicates presence or not of a data block (for use in animals this shall be <b>0</b> = no data block)
17-26	4	1,024	Mandatory ISO 3166 numeric 3-digit country code, i.e. <b>826</b> to represent UK
27-64	12	274,877,906,944	National identification code (unique number from <b>1</b> to <b>274,877,906,944</b> )

An example of a UK electronic identifier (ear tag or bolus) coded in accordance with the above requirements is shown below:

Animal identification code	Interpretation of code
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1 0 04 00 0 826 024422000100	1 = animal identifier 0 = retagging counter (no retag) 04 = species code for sheep & goats 00 = reserved zone 0 = no data block 826 = country code for UK 024422000100 = individual animal number
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### 3.3 Despatch of boluses

Where the supplier supplies both tag and bolus it is important that the correct match-up tags is supplied. Therefore, boluses must be sent out in such a way to make it easy for the recipient(s) to apply them both successfully. This may mean, for example, supplying boluses with their match-up tags together in a bag to ensure they remain linked until they need to be applied to the animal, or supplying a bar code label to allow electronic matching/checking of pairs of tags and boluses.

### 3.4 Printing, embossing or marking of ear tags

Ear tags which have not met the PAS 66:2009 criteria must not be printed, embossed or otherwise marked with this information and should not be used for the purpose of official identification.

### 3.5 Use of reserved ear tag colours

A range of colours have been reserved for specific ear tag use and cannot be used for any other purpose other than that associated with the named colour. The reserved colours are:



**ELECTRONIC**

**Yellow:** used only for electronic tags (England and Wales)



**BOLUS**

**Black:** used only for ear tags where the animal has an electronic bolus



**REPLACEMENT**

**Red:** used only for replacement tags including replacement electronic tags

The matching non-electronic ear tag to an electronic ear tag may be any other colour other than the reserved colour except for the replacement tags where the pair must be red. Suppliers must:

- ensure they specify the purpose for which the ear tag is required at the time of ordering, to ensure it is matched correctly on ETAS.
- only provide yellow, red or black ear tags for their reserved purpose and ensure other colours are not sold for any of these reserved purposes.



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# Annex A: Manufacturer/Supplier Undertaking

.....  
(insert name and position in company), agree that

.....(insert name of company) will operate  
in accordance with the GREAT BRITAIN, SHEEP AND GOAT EAR TAG MANUFACTURERS  
/ SUPPLIERS CODE OF PRACTICE.

**Signed by:**.....

**Print Name:**.....

**Date:**.....

**Company Name and  
Address:**.....

.....  
.....  
.....  
.....

**Please complete and return this form to:**

The Team Leader  
BCMS ETAS Support  
BCMS  
Curwen Road  
Workington  
Cumbria  
CA14 2DD