

Department for Environment, Food and Rural Affairs

Summary of responses to the non-formal consultation on electronic reporting of pig movements in England and two other minor changes to the Pigs (Record, Identification and Movement) Order 2007 – PRIMO (18th May to 15th June 2011)

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Llywodraeth Cymru
Welsh Government

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<http://www.defra.gov.uk/consult/2011/05/18/pig-movements1105/>

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1. Background

Electronic reporting of pig movements

- 1.1 The purpose of this consultation was to seek views on the implementation in England of a system to provide for the electronic reporting of pig movements by pig keepers. This followed on from a pilot project which assessed electronic capture of pig movements into a centralised system. Since March 2009 the project has been developed and managed through a partnership approach between government and the pig industry.
- 1.2 The consultation proposal was to change the current system where pig movements are reported to Local Authorities (LAs) on a paper movement document (AML2) by destination keepers. LAs then record the movement on a central database. The intention is that a new electronic movement reporting system would be operated for the pig industry by the British Pig Executive. It would retain a paper channel for non IT enabled keepers so that they are not disadvantaged. The aim, demonstrated by the pilot project, is to provide more accurate and timely details of pig movements. The new system will require the pre-notification of pig movements. As well as easing the burden on keepers the system would enhance Government and industry's ability to manage future disease outbreaks.

Other areas consulted upon

- 1.3 The consultation also sought views on three other areas, these were:-
- a) Permitting the use of a new technology (compressed air powered equipment) to apply slap marks (tattoos). This will be an alternative and voluntary option to current manual slap marking equipment.
 - b) Providing for boars moving to artificial insemination centres to be individually identified and recorded to enable semen to be traceable back to the donor in case it is suspected as the agent of disease transmission.
 - c) Reducing the retention period for on farm records from 6 to 3 years.
- 1.4 Moving to electronic reporting and the above-mentioned changes will necessitate PRIMO changes.
- 1.5 The consultation sought the views and comments of stakeholders on these proposals including key industry bodies representing the majority of the pig sector in England:
- | | |
|-----------------------------|--|
| A) National Pig Association | Represents the majority of commercial Producers (800) covering around 80% of the national pig herds. |
| B) British Pig Executive | Represents pig levy players in England and is a division of the Agriculture and Horticulture Development Board |

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C) British Pig Association	Represents 1,500 pig keepers in England – the majority of members have small herds and keep pedigree or rare breed pigs.
D) Livestock Auctioneers Association	Represents some 84 Livestock Markets in England and several independent livestock auctioneering companies.
E) British Meat Processors Association	Represents big and small slaughterhouses and the meat and meat product industry.
F) Country Land Owners Association	Represents 38,000 land managers, and rural businesses.

Other stakeholders consulted included, delivery partner organisations, animal identity manufacturers and software suppliers, rare breed societies, transport organisations, veterinary societies, enforcement bodies, retail organisations, welfare bodies and artificial insemination centres.

2. Responses

2.1 15 responses were received from the following:-

Industry bodies

British Meat Processors Association (BMPA)
British Pig Executive (BPEX)
British Pig Association (BPA)
Country Land Business Association (CLA)
Livestock Auctioneers Association (LAA)
National Pig Association (NPA)

Transport Organisations

Road Haulage Association (RHA)

Local Authorities / Trading Standards

Central England Animal Health and Welfare Group
Trading Standards Institute (TSI)
Devon County Council
East Riding of Yorkshire Council
North Yorkshire County Council
Somerset County Council

Livestock Markets and Auctioneers

Frank Hill & son Auctioneers

Animal Welfare Organisations

Royal Society for the Prevention of Cruelty to Animals (RSPCA)

3. Overview of Responses

Electronic reporting – general

- 3.1 All respondents agreed with the proposal to replace the current paper method of reporting pig movements in England with an electronic system. It was considered that this system would offer more accurate and rapid collection of movement data and enhance both government and industry capabilities to respond to the threat of exotic disease outbreaks. The organisations representing the pig industry had the most favourable outlook, including the BPA whose members include smaller keepers of pedigree and rare breeds. The CLA appreciated the electronic system would make sense for the larger commercial producers but stressed that it needed to be practical for those with small holdings and herds.
- 3.2 The option of introducing electronic reporting combined with a bureau service for non IT enabled keepers was considered a suitable way forward. The opportunity to provide a non-electronic route (the bureau service) was considered essential so that keepers who did not use computers would not be placed at a financial disadvantage by having to purchase computer equipment. The preferred option was therefore - 3a, which estimated that c.70% of movements could be reported electronically by April 2012 and 30% through the bureau service.
- 3.3 The majority of respondents agreed with the proposals in the questions on electronic reporting. Some concerns were expressed which related more to processes. Defra will respond directly to respondents on those points. These are covered under the summary to each question at paragraph 4 and other comments at paragraph 5.
- 3.4 There was agreement that a transition period should be provided to allow farmers time to become familiar with the electronic system. There was no strong consensus for whether the period should be for six or twelve months. The industry organisations, aside from the LAA, favoured a six month period whilst some others preferred 12 months. The industry view was that 6 months would allow sufficient time to allow communication to smallholders and that the system is not complex and as it has been extensively trialled.

Electronic reporting – impact assessment (IA)

- 3.5 There were no comments on the costs outlined in the impact assessment.. The Trading Standards Institute (TSI) were not convinced that 70% of *keepers* would take-up the electronic system as is estimated under option 3b in the IA. This percentage related to the number of *moves* (made by the bigger keepers) which might potentially be reported electronically and not the number of keepers using the electronic system.

Electronic reporting – Draft order – PRIMO 2011

- 3.6 There were a number of comments on the draft order and these will be reviewed and taken into account in the preparation of the Order.

Provision for compressed air applied slap marks

- 3.7 Respondents agreed to the option for keepers to use this equipment. The Central England Animal Health and Welfare Group suggested that this might be used only for

pigs over a certain age and weight and in one-site farrow units. The overall view was that any equipment which would improve welfare should be supported. The RSPCA would prefer to see single and not double slap marking.

Individual identification and recording for boars moving to artificial insemination centres

3.8 There was unanimous agreement to this proposal as it would enable the trace back of semen from individual boars in the event of an exotic disease outbreak.

Reduction of the retention period for holding records from six to three years

3.9 The majority agreed that this was sensible as it would bring the retention period in line with that for sheep records. The TSI recognised this and suggested considered of whether pig records might need to be retained for longer in consideration of the disease risk that pigs can present in relation to contact other species.

4. Responses to the questions in the Consultation

4.1 Chapter 4 of the consultation document raised a number of specific questions on which we sought answers in order to shape the legislation. There were 10 questions in total; of which 7 related to the proposed electronic reporting system.

4.2 The responses are summarised below. Some respondents do not answer all questions.

Q1. Do you support the introduction of electronic reporting for pigs as a means of providing more accurate and timely information?

Responses: 14	Agree: 14	Disagree : 0	Don't Know: 0
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4.3 There was unanimous agreement to take forward electronic reporting. Industry organisations representing keepers considered this was essential in helping to produce more timely and accurate movement records which would in turn assist greatly with tracing animals in the event of a disease outbreak. The CLA suggested that electronic reporting would be of greater benefit to the large scale highly professional and vertically integrated sector than to smallholders. This view was countered by BPA who represent small pig keepers with herds of less than 10 sows whose members had been concerned about delays in tracing movements at the start of a disease outbreak. They considered that electronic reporting offered an important step towards improving traceability so enhancing industry and government ability to respond quickly to disease outbreak threats. They advised this was the best way forward for their sector. The organisations representing slaughterhouses, livestock markets and hauliers (BMPA, LAA and RHA) supported electronic reporting with the RHA commenting that it was important that keepers did not leave it to drivers to complete paperwork.

4.4 Welfare organisations (RSPCA) welcomed electronic reporting because it would provide more rapid and timely information on pig movements in the event of disease outbreak. The early control of an outbreak would therefore reduce the number of animals affected giving clear animal and welfare benefits. TSI and Local Authorities also supported electronic reporting. They were mindful that a close eye needed to be kept on the take-up and accurate holding registration.

Q2. Do you agree that the new system should provide for a bureau service so that non IT enabled keepers who wish to report movements on line can do so by phone, fax or paper?

Responses:13	Agree: 13	Disagree : 0	Don't Know: 0
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4.5 There was unanimous support. This was considered an essential feature. BMPA wanted the bureau service to act as hotline for keepers with speedy access in case the system went down and several loads of pigs arrived at the same time at a slaughterhouse. TSI commented that the bureau service should not be cumbersome for keepers to use; otherwise there might be under-reporting. BPEX were in agreement provided the bureau service would be fully funded.

Q3. Do you agree that the benefits of electronic movement reporting for the industry as a whole, justifies the new requirement for a minority of keepers using the non-electronic route, to pre-notify pig movements?

Responses: 13	Agree: 10	Disagree : 2	Don't Know: 1
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4.6 CLA and TSI did not agree. CLA suggested that small keepers using the bureau service having to pre-notify movements was not proportionate including for keepers who reported moves infrequently and had jobs outside farming. TSI believed numbers of keepers estimated to use the electronic route was questionable (the IA based this on movements and not keepers). They were also concerned that pre-notification under the bureau service might be complex and if this was the case some movements could go unreported. On the other hand the NPA stated that very few pig moves currently take place without some form of pre-notification arrangement with the destination and so this in fact should not represent a significant burden. The 'don't know' from East Riding of Yorkshire Council was because they thought pre-notification may not be necessary for urgent moves e.g. casualty pigs to, veterinary treatment (PRIMO will provide for this).

Q4. Do you agree that a transition period should be used to allow farmers time to become familiar with electronic reporting arrangements?

Responses: 13	Agree: 0	Disagree : 0	Don't Know: 0
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4.7 Unanimous support. All respondents believed a transitional period would allow businesses time to amend their own processes and ensure familiarity with new system. CLA did not have strong opinions on length of the period noting there should however be an information programme to help keepers understand changes to the current reporting process.

Q5a. Do you agree the transition period should be for six months starting from October 2011, or

Responses: 13	Agree: 7	Disagree : 5	Don't Know: 1
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Q5b. Do you agree the transition period should be for twelve months starting from October 2011

Responses: 13	Agree: 5	Disagree : 7	Don't Know: 1
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Q6. Do you agree that non IT enabled keepers can use a paper copy of the haulier summary for moves to markets, collection and assembly centres?

Responses: 12	Agree: 11	Disagree : 1	Don't Know: 0
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4.8 There was general agreement that this is a pragmatic solution allowing keepers to send pigs to market without any delays. Somerset County Council was the "don't know", and queried whether markets had agreed to enter information on the day of movement and what would happen if details were missing.

Q7. Do you agree that the individual movement licence for moves off markets, collection and assembly centres is no longer required?

Responses: 12	Agree: 10	Disagree : 2	Don't Know: 0
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4.9 The majority agreed that with same day electronic movement reporting such licences would serve little purpose. TSI and East Riding Yorkshire County Council did not agree, in so far as they suggested completing these licences assisted with their monitoring compliance in other areas, and that BPEX may not be able to pick up movement anomalies. As trading standards inspectors are often on duty at livestock they wondered if resource savings would in practice be limited (as was noted in the IA). It was acknowledged that while this may reduce burdens for some LAs it might increase burdens for market office staff. Also, that moves through markets represented a higher disease risk hence the utility of individual movement licences. It was also suggested their removal might increase unreported movements by unscrupulous traders.

Q8. Do you agree that the period required to keep holding records should be reduced from six to three years?

Responses: 12	Agree: 11	Disagree : 0	Don't Know: 1
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4.10 The majority were in agreement. The don't know was from TSI who noted that while this would bring the retention period in line with other species pig records would have been kept longer as they represented a greater disease risk in relation to other species. They suggested veterinary opinion should be sought on this issue.

Q9. Do you agree that the use of compressed air slap marking equipment should be permitted?

Responses: 13	Agree: 11	Disagree : 0	Don't Know: 2
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4.11 The majority were in agreement welcoming any equipment which was more welfare friendly. The RPSCA were disappointed that single slap marks were not considered. The Central England Animal Health and Welfare Group suggested that they were appropriate for pigs over a certain age and weight. CLA and TSI were 'don't knows' both had no opinion.

Q10. Do you agree that boars moving to an AI collection centre authorised for EU/and/or domestic trade should be individually and uniquely identified?

Responses: 13	Agree: 11	Disagree : 0	Don't Know: 2
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4.12 There was Unanimous support as AI centres distributed semen throughout the country and this would provide more accurate and timely information in the event of a disease outbreak.

Other Comments

5.0 In addition to those ten questions a number of additional comments and queries were received. These are summarised below:-

a) Identification

- A review to look into a move to single slap marking was suggested
- Defra was asked to consider development of micro-chipping for all species

b) Working in partnership

- Pig keepers organisations reiterated that the pig industry has worked closely with Defra on developing the new system through the pilot project which should improve traceability and early management of exotic disease outbreaks.

c) Future approach to managing disease

- Industry believed that with electronic reporting and increased accuracy and timeliness of movement data and with partnership approaches to data management there should be proportionate disease controls by authorities e.g. controls on movement restrictions.

d) Access to data on the new electronic system

- Assurances should be given that local authorities trading standards departments can access data and documents on the BPEX system.

e) Enforcement

- Time taken to complete/notify movements should be monitored.
- Clarification is necessary on the point of contact for local authorities to assist with investigations of pig movements.
- Clarification is necessary on who would provide witness statements when/if enforcement action is necessary.

f) Processes

- Consideration should be given to reducing the deadline for confirmation of receipt of pig movement from 3 days to 1 day.
- Clarification should be given on the follow-up action for processing illegible movement documents.
- Clarification should be given on whether the electronic system had the facility to shut down pre-notification in the event of a disease outbreak.

g) CPHs (County Parish Holding numbers)

Concern were raised as to whether temporary premises and related movements could be matched on the system.

h) Haulier Summary / Movement Document

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It was suggested that loading and departure times on the pre-printed on the haulier summary could not be amended.

i) Contact point and opening times of bureau service

It was noted that the opening times of the bureau service must not be restrictive otherwise that could lead to movements without pre-notification.

What the government is going to do as a result of the consultation

Roll out electronic reporting, with a bureau service.

Following overall agreement to electronic reporting, a new PRIMO Order will be made to provide the statutory basis for voluntary e-reporting from October 2011.

BPEX will coordinate a communication campaign from August 2011 through to 2012 to publicise the new systems (full electronic reporting and the bureau service).

Phase out the current paper reporting forms after a transitional period

There will be a transitional period of six months from October 2011 to April 2012 before the current AML2 paper report forms are phased out.

Permit the use of compressed air slap marks

PRIMO will provide for keepers to use this voluntary method of applying slap marks.

Require individual recording and reporting of boars moving to artificial insemination centres

PRIMO will make this a requirement from October 2011.

Reduce of the period for which keepers have to retain holding records

PRIMO will make this a requirement from October 2011.

Respond to consultation respondents' questions

Defra will respond to each organisation / person who responded to the consultation with queries.