



Department for
Business, Energy
& Industrial Strategy

Business Impact Target: Assessment Template

Business Impact Target Qualifying
Regulatory Provisions (QRP) assessment
template



April 2017

Regulator Assessment: Qualifying Regulatory Provisions

Title of proposal: Amending guidance explaining how to apply for a CPH number

Lead Regulator: RPA

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Date of assessment: Jan 2018

Commencement date: Oct 2017

Origin: EU

Does this include implementation of a Cutting Red Tape review? Yes – it is part of the work to implement the recommendations of the Farming regulation task force

Which areas of the UK will be affected? England

Section 1: Brief outline of proposed new or amended regulatory activity

The way that Livestock keeper can apply to register temporary use of any land used to keep livestock has changed. Keepers can now apply for a temporary land association (TLA) to be used with an existing County Parish Holding (CPH) number or apply for a temporary CPH number where the land in question will be used to keep livestock for fewer than 12 months. Responsibility for administering this has moved from the Rural Payments Agency (RPA) to the Animal and Plant Health Agency (APHA). The guidance on how to apply for both CPH and temporary CPH numbers has been revised and published on GOV.UK

Section 2: Which type of business will be affected? How many are estimated to be affected?

During 2017 RPA issued approximately 9,000 CPH numbers to livestock keepers. RPA recorded that around 60% of the people who contacted the agency to register their holding were 'hobby keepers' who were typically responsible for one or possibly two animals and who did not keep livestock on a commercial basis. Anecdotally, the people who field the calls say that these people have been directed to us either by vets or by the people they purchased the animals from having been told that they needed to register with us and given the contact centre number. In general these are people who have a goat or a couple of sheep in their large garden or are people who have a micro pig as a pet. Once we have registered their premises for keeping of livestock they don't engage with any of the other services RPA provide because they are not relevant to them.

Section 3a: Summary of costs and benefits

Price base year	Implementation date	Duration of policy (years)	Net Present Value	Business Net Present Value	Net cost to business (EANDCB)	BIT score
2016	2017	10	-£0.03m	-£0.03m	0	0

Section 3b: Please set out the impact to business clearly with a breakdown of costs and benefits

To familiarise with how to register their holding, livestock keepers would read the online guidance which is in line with EU requirements. The guidance itself does not introduce any additional costs on these businesses. Therefore the additional costs to business from this guidance is the time it takes to read and understand it. In fact, this could benefit businesses by making it easier for them to understand the process.

The guidance is just under 2,000 words long. The average reading speed for adequate levels of comprehension for an adult is between 200 and 300 words per minute. We assume the slower rate, suggesting it would take one person 10 minutes to read and understand the guidance. The Full Economic Cost of time for Managers and Proprietors in Agricultural Related Services is £18.60 per hour¹. Therefore the cost per person reading the guidance will be around £3. If we assume that one person on each of the 9,000 holdings which applied for a permanent CPH number during 2017 read the guidance, then the total one-off cost to businesses in England is around £27 thousand. Given the negligible impact on a per business bases (the unit cost per business is below £10), it is not proportionate to carry out further analysis to refine these assumptions. Furthermore, quoting the above number in a final publication would suggest accuracy where there is little. Therefore the additional costs to business from this measure are less than £50,000, and should round to zero for the BIT score.

Allocating a permanent CPH number is a once and done arrangement rather than an ongoing licencing arrangement. You can only apply for a CPH number if you intend to use the land you register as a holding for more than 12 months. If the land will be used to keep livestock for less than 12 months then an individual or business has to apply to APHA for a temporary CPH number (tCPH).

On that basis, we have assumed that interest in applying for a CPH will be limited to those who have to register a premises which has not previously been registered as a place to keep livestock. As registration of a premises only has to be completed once we have assumed that this is a one off cost. We have also assumed that the cost to business lasts for a year as the process to contact RPA to register is the same the process to contact RPA about anything else (including agricultural subsidies and livestock movements) so those who engage with RPA services (the businesses rather than the hobby keepers), will through other engagement with the RPA, have an awareness of the process should they need to do this in the future.

¹ ONS 2016 revised Statistics on Annual Survey of Hours and Earnings, Table 14.5a, SOC 121 (Managers and Proprietors in Agricultural Related Services) mean hourly gross wage of £14.31, uprated by 30% to account for overheads

Section 4: Please provide any additional information (if required) that may assist the RPC to validate the BIT Score

APHA included the change to the process to apply for a tCPH number in their NQRP. The text from the document is appended below for ease of reference:

There have been measures implemented relating to EU legislation that have not changed the regulatory requirements but allowed greater use of scientific interpretation of risks.

Introduction of new Temporary Land Use Registration :

New rules have been introduced to adhere to EU legislation that have replaced species specific rules and processes. Registration that was previously verbal now requires submission of a signed application form containing details of all the land to be used by a farm business.

This will affect livestock keepers who use land on a temporary basis in England and approx.3000 applications have been processed in first 6 months.