

Department for Environment, Food and Rural Affairs

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

Response form

Date: March 2010

Please use this form to answer the questions contained within the '**Consultation on the simplification of livestock movement rules and holding identifiers in England**'.

The closing date for the submission of responses is **30 June 2010**.

Responses can be returned by email (preferable) or post.

Email address CPHconsultationteam@defra.gsi.gov.uk

or by post to:

**CPH Consultation Team
Livestock and Livestock Products
Area 5E Millbank
c/o Nobel House
17 Smith Square
London SW1P 3JR**

In order to help us analyse responses, please provide details of your organisation below.

When this consultation ends, we intend to put a copy of the responses in the Defra library at Ergon House, London. This is so that the public can see them. Also, members of the public may ask for a copy of responses under freedom of information legislation.

If you do not want your response - including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

We will summarise all responses and place this summary on our website. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.

Name	Cathy Cassie
Organisation / Company	Hebridean Sheep Society
Organisation Size (no. of employees)	voluntary
Job Title	Chairman

Department	
Address	c/o Secretary Coney Grey Gun Lane Sherington, Newport Pagnell MK16 9PE
Email	membership@hebrideansheep.org
Telephone	01455 553097
Fax	

Organisation Type	Please mark/give details as appropriate	
NGO	<input type="checkbox"/>	
Public Sector (eg, local / central government, hospitals, universities) (please give details)	<input type="checkbox"/>	
Retail Sector (eg, supermarkets) (please give details)	<input type="checkbox"/>	
Service Sector (eg, cinemas, hotel chains, banks) (please give details)	<input type="checkbox"/>	
Light Industry / Manufacturing	<input type="checkbox"/>	
Property Management	<input type="checkbox"/>	
Trader / Verifier	<input type="checkbox"/>	
Research Institute	<input type="checkbox"/>	
Other (please give details)	<input checked="" type="checkbox"/>	Sheep Breed Society

NB: on the form below, please leave the response box blank for any questions that you do not wish to answer. All boxes may be expanded as required.

Q 1.Views are invited on the impact of the proposals on individual businesses/sectors.

The Hebridean Sheep Society (HSS) recognises the need for a simplification of the current livestock rules and holding identifiers and is fully supportive of standstill arrangements as a key part of the Governments disease control strategy. There will, nevertheless, be significant impacts on some of our members as a result of the proposed changes arising from the changes to isolation units, the cost of these, and the implications of the ten-mile radius on businesses that use land outside of that radius.

Q2. Views are invited on the use of 'place of business' as the point for measuring the 10 mile radius.

It is important that the 'place of business' is flexible enough to accommodate the fact that some sheep keepers do not live or have office facilities at the same place as the main base of livestock operations, and that the main base of livestock operations may not necessarily have a postal address

Q3. 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**
- (b) the allocation of CPH numbers for land and buildings beyond a 10 mile radius of the main holding**
- (c) Commons**

It is our strong view that there should be an option to operate more than one holding number within the ten mile radius of the main holding where this is an integral part of the operation of the farm business.

Q4. Views are specifically invited on how long any rented land should be associated with the main holding, or temporary CPHs remain valid, before a review/renewal is needed

- (a) 6 months**
- (b) 1 year**
- (c) Other, please specify**

The allocation of temporary holding numbers should reflect the term of the grazing agreement or tenancy, rather than being defined by an arbitrary timescale

Q5. 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.

Abolition of Sole Occupancy Authorities will have an impact on our members in cases where land outside the ten-mile radius is in use and where there is a desire to have the ability to manage that land as part of the main holding for movement purposes.

Q6. Views are invited on the timing of the abolition of (a) CTS Links and (b) SOAs.

This should allow a sufficient timescale to allow farmers and farm businesses to make the necessary changes to their business management practices and to provide such facilities as are required to accommodate these changes. Two years would be a reasonable timescale to accommodate any such changes.

Q7. Views are invited on:

- (a) the proposals for extending the use of Isolation Facilities**
- (b) the application process**
- (c) how they might be operated.**

HSS is pleased that there is a proposal to extend the use of isolation facilities beyond the current arrangements for breeding rams and movements to and from shows. A significant proportion of our membership use isolation facilities for the purposes defined above, and feel strongly that both for breeding rams and for movements to and from shows, the facilities are a vital tool for any pedigree livestock breeding enterprise. However, our members are strongly of the view that the proposal to make a charge for the use of such facilities, at the suggested rate of £250 per annum, is disproportionately high. HSS supports the need for stringent controls on the use of isolation facilities in order to ensure they are used correctly, and agrees that an initial inspection is essential, but questions the need for an annual inspection once the isolation unit is established. HSS urges DEFRA to consult with show organisers to assess the impact of these proposed changes on their businesses and enterprises.

Q8. In what specific circumstances would Isolation Facilities as proposed be useful to you/livestock businesses?

As breeders of pedigree livestock, many of whom use shows to promote and market their animals, HSS members find the existing use of isolation facilities to be an important part of the operation of their businesses, in order to facilitate movements to and from shows without subjecting the rest of the holding to standstill. HSS members also use the current arrangements for the isolation of breeding rams to a significant degree, as the majority of livestock movements on and off members' holdings occur during or around the breeding season, 1st September to 30th November, and all of our Pedigree approved sales take place during this same period. HSS members consider the proposed annual charge for isolation facilities to be disproportionately high, however, in relation to the value of their livestock and the numbers of animals involved.

Q9. Views are invited on the proposals for permanent sheep and goat movement reporting arrangements.

HSS feels that the current temporary arrangement, where batch recording of movements of sheep in the same keepership is acceptable, should remain in place.

HSS would support a move towards an electronic movement recording and reporting system alongside the existing paper-based AML1 system.

Please insert any other comments you may have on the consultation document, not covered by any of the questions above.

HSS would support a move away from inspections by various agencies and would prefer one regulatory body or farm assurance scheme to responsible for all inspections. We stress that as breeders of pedigree livestock, of a minority breed, our members have the best interests of their own livestock, National disease control, and properly operated, easy to understand regulation at heart. HSS would further like to see a move towards a more streamlined system of movement reporting and recording between England and Scotland, as the current differences in systems cause much confusion and interfere with smooth across-border trading.