Department
for Environment
Food & Rural Affairs

Cattle Identification Regulations 2007, as amended: Post-Implementation Summary Report 2023

Date: November 2023

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.

This publication is available at www.gov.uk/government/publications

Any enquiries regarding this publication should be sent to us at CattleID@defra.gov.uk

www.gov.uk/defra

Contents

Introduction

The Cattle Identification Regulations 2007 for England came into force in April 2007 and were designed to amend and consolidate regulations covered by seven pre-existing Statutory Instruments. They maintain the framework for the identification, registration, and movement of cattle, bison, and buffalo within England. They require keepers to register and identify their beasts and record and report traceability information, thereby allowing the government to identify and locate beasts at risk of disease or involved in a food safety incident and thereafter take appropriate mitigating action.

This Statutory Instrument is vital to Government's ability to respond effectively to a bovine related disease outbreak: it underpins endemic disease control measures, such as tackling bovine TB, and it enables an appropriate level of preparedness for an exotic disease outbreak in Great Britain.

Scope of Post-Implementation Review

This report will set out the objectives intended to be achieved by the statutory instrument, assess the extent to which those objectives have been achieved, and assess whether those objectives remain appropriate and, if so, the extent to which they could be achieved with a system that imposes less regulation.

A proportionate approach has been taken towards the level of evidence sought. The net benefit to industry per year as a result of this SI was estimated in its Regulatory Impact Assessment at just under £6,000. As a result, scrutiny of this Post Implementation Review by the Regulatory Policy Committee was not required.

No monitoring and evaluation plan is extant, nor was baseline data set at the outset. The regulatory impact assessment for the regulations was reviewed; stakeholder views from the cattle industry and the arms lengths bodies RPA and APHA have been sought. There is an absence of substantive data and evidence to establish the direct impact of this SI.

Background

In the fifteen years or so prior to the Cattle Identification (England) Regulations 2007 (CIR 2007) coming into the force, the cattle industry in the UK had been heavily impacted by the effects of Bovine Spongiform Encephalopathy (BSE), and its later zoonotic link to humans in the form of Creutzfeldt-Jakob disease. As well as the harm caused to public and animal health, British beef exports were banned. In quick succession, regulations were brought into force in response to BSE. A central cattle traceability database, Cattle Tracing System (CTS), run by the British Cattle Movement Service (BCMS), was also created in 1998 to facilitate better traceability of the national herd. The wider livestock industry was further decimated by the 2001 Foot and Mouth disease outbreak, which according to 'The 2001 Outbreak of Foot and Mouth Disease Report' by the Comptroller and Auditor General, caused a direct cost to the public sector estimated at over £3 billion and the cost to the private sector estimated at over £5 billion. The importance of traceability was made clear.

The CIR 2007 were designed to amend and consolidate the cattle traceability regulations brought in during this era. The SI also made two changes to procedures: stopping the use of temporary calf passports and enabling late birth registrations to be supported by DNA test evidence. It also supported electronic reporting procedures.

Objectives for the regulations

The overarching objectives of the CIR 2007 were to maintain and improve cattle traceability for disease control and subsidy management purposes; and to make resource savings for industry and Government.

Current system

Cattle traceability rests on the compliance with requirements made on keepers by the CIR 2007 to take certain actions including to record and report certain pieces of information about the identification, registration, and movement of their beasts within varying deadlines, and the operation of the Cattle Tracing System (CTS) database and service supporting that. The CIR 2007 requires that cattle must have ear tags

fitted shortly after birth showing a unique identifying number. This number identifies the beast and its country, regional area, and herd of origin. A beast's keeper must apply to register it with the Secretary of State, and this application is thus reported and registered on the CTS database. Its keeper is then issued a paper cattle passport, without which, the beast cannot be moved nor enter the food chain. Keepers must also maintain a record of all their beasts in a holding register. When a beast moves or dies, keepers must record and report this. In this way, each beast can be identified, traced, and physically located throughout its life.

The system uses the duality of recording and reporting by keepers, the former in the holding register and the latter reported to the CTS database, to ensure a mutually corroborative traceability picture. It is a system reliant on paper - whether that is cattle passports, movement cards, or holding registers - and on the ear tags of beasts being correctly read and transcribed correctly. CTS can only record single-ended movements where a keeper reports the beast moving 'off' their holding, with the receiving keeper reporting the beast moving 'on' to their holding separately. The aging data architecture of CTS precludes further development.

Actual versus estimated costs

The CIR 2007 consolidated and updated seven pre-existing Statutory Instruments. This simplification brought more clarity and greater ease of understanding for keepers: desirable in order to improve the accuracy and timeliness of traceability data capture needed to tackle a significant disease outbreak. The cost benefits of faster animal tracing and mitigating activity by Government from this better data capture are difficult to monetise.

The regulatory impact assessment for CIR 2007 estimated that the impact on industry of amendments to the pre-existing cattle identification regulations would be small. It estimated overall net costs across both Government and industry would be £13,640 per annum, with an estimated net benefit to industry of £5760 and a net cost to Government of £19,400.

The regulatory impact assessment identified a prospective saving of approximately £40,000 per annum for industry by reducing the cost of replacing any lost, destroyed

or stolen cattle passport from £50 to £20, with an equivalent cost for the British Cattle Movement Service.

This review has attempted to determine to what extent this saving (benefit) was realised since the introduction of this measure, however due to data limitations this has not been possible. Available CTS data only shows the number of passports re-issued by reason, such as lost in post, return or printing error, damaged or destroyed, and not where a replacement charge has been made. As a result, the cost saved by keepers due to the reduction in charge for a replacement passport from £50 to £20 cannot be accurately quantified. However, CTS data shows that 536,290 passports were re-issued in England since the date of commencement of CIR 2007 and the end of 2022. The principal reason for re-issuance was for inaccurate information printed on the passport, e.g., incorrect sex or breed. This accounted for 376,979 re-issuances. In relation to passports that have been lost, stolen, or destroyed: 45,460 were lost in the post, 6269 were damaged or destroyed, and 463 were reported stolen, collectively totalling 52,192. While we cannot determine from the data where a charge has been made, the maximum saving would be in the region of £1.56 million or around £100,000 per annum. However, this is likely to be an overestimate as not all passports that were reissued would have faced the charge.

The original impact assessment also estimated a government saving of around £20k per annum due to recovery of costs from keepers who have had beasts compulsory slaughtered. However, this has not been routinely actioned so the estimated saving for Government of £20k per annum has not taken place.

Changes to late passport application procedures where a DNA test can be used to confirm the dam and calf relationship were estimated to have a neutral impact on industry and Government and this is borne out. The DNA procedure is in place and is used relatively infrequently. Available CTS data shows that over 1500 DNA appeals took place in England from December 2018 to the same month in 2022 (these DNA appeals can relate to multiple animals). Of these, over 1400 were successful. The late passport application appeal process has two separate routes: DNA testing and exceptional circumstances.

Any impact on industry by the stopping of temporary calf passports in 2007 has been negated by the high level of efficiency of issuance of cattle passports by the British Cattle Movement Service. Available CTS data shows that only eight welfare licences were issued to authorise the movement of calves under 27 days old (without passport) in the last three years (2020, 2021, and 2022). The estimated neutral impact of stopping temporary calf passports has been borne out.

Given the lapse of time since the CIR 2007 came into force, it has been difficult to collate relevant quantitative evidence: it has therefore not been possible to robustly compare the estimated costs with actual costs. Apart from recovery of costs for compulsory slaughter by Government, anecdotal evidence suggests that actual costs have been broadly analogous with estimated costs for both industry and Government.

Have the objectives of the regulations been met?

It can be argued that the objectives of the CIR 2007 to maintain and improve cattle traceability and make resource savings for industry and Government have both been met. However, it is to be noted, that within four months of the CIR 2007 coming into force, the UK experienced a foot and mouth disease outbreak. According to the subsequent lessons learnt report about this FMD outbreak, the Anderson Report 2007,

> "…access to timely and accurate data on the location and movements of farm animals was poor: there was both an in-built structural time-lag in the data available because of the time an animal keeper has to complete a return and the time taken then to process it, and because of the incompleteness of the data."

The regulatory framework for cattle traceability, including CIR 2007, allows three calendar days for a keeper to report a movement to CTS. The majority of notifications received by CTS are digital, but the regulations allow for a movement to be reported in writing using a BCMS supplied movement card. These paper-based notifications are small in number: according to BCMS data, 2571 movement cards were used

between April 2021 and March 2022, but they still would have the potential to hinder the speed of response to a fast-paced disease outbreak.

Exercise Blackthorn in 2019, enabled the UK administrations to test contingency plans for an outbreak of Foot and Mouth Disease, including the real-time use of the different GB animal movement systems to demonstrate the effectiveness during an outbreak of FMD: cattle traceability was not raised as a specific area of concern. The discovery of a classical BSE case in Somerset in September 2021 involved tracings of the beast's forbearers, cohort, and progeny; no concerns about the beast's traceability were raised.

It must be recognised that livestock traceability involves an evolving level of preparedness for a disease outbreak. Traceability can always be improved upon, not least by the provision of more accurate and timely traceability data. The ongoing development of the Livestock Information Service may assist in both these areas.

Key findings

Consolidation was effective and made complex requirements easier to understand:

Clear, concise and effective regulations are vitally important in maintaining accurate and timely traceability information for the identification, registration, and movement of cattle, bison, and buffalo within England. The consolidation of the regulations within CIR 2007 has been effective, in that, compared with the regulations they replaced, the CIR 2007 made the requirements on keepers clearer, easier to understand, and put cattle traceability regulations all in one place. However, further clarity and simplification would likely improve keepers' understanding and improve accuracy and timeliness of data capture and thereby improve Government's ability to tackle a significant disease outbreak.

The requirements made on keepers by the CIR 2007 are now well known and accepted by the cattle industry in England. John Royle, livestock lead for the NFU, has stated:

> “I think the industry has a good understanding of the CIR 2007 regs…When things do go wrong, i.e., late registrations or failure to report deaths for example, it is often linked to a crisis on the farm such as a family breakdown, health issues and especially mental health problems where the keeper is unable to cope.”

A belt and braces approach to recording and reporting requirements:

The CIR 2007 made dual, and mutually corroborative, requirements on a keeper for:

- Identification – ear tags and cattle passport,
- Registration of beasts – record in holding register and report to CTS, and
- Movements of beasts – record in holding register and on passport and report to CTS.

Correctly fitted and maintained ear tags and a cattle passport, which must be conveyed with the beast at all times, provides continuity of identification throughout its life.

This duality is understandable given the now historical context: the aftermath of BSE and the 2001 Foot and Mouth outbreak, pre-mobile phone technology and the infancy of broadband and an inevitable reliance on paper-based administration. Technology and digital connectivity have improved significantly since the commencement of the SI, outstripping the need to report births, movements, and deaths in writing. In essence, the duality of recording and reporting for keepers doubles the task in terms of administrative time spent. Recording in a holding register and reporting the same information to CTS may increase the risk of inconsistencies in traceability data and cause unnecessary dubiety.

A paper-based system is slow, costly, and burdensome:

A good example of where a keeper carries out tasks to fulfil regulatory requirements for the CIR 2007 is recording and reporting movements of beasts ‘off’ and ‘on’ their holding. These regulatory requirements can be completed both on paper, digitally, or

a combination of the two. As an example, the table below shows the sequential tasks a keeper is required to complete for a beast moving 'off' their holding:

Task	Notes
Check the identity of the beast, visually confirm beast is correctly identifiable with primary and secondary ear tags and transcribe the unique identifying number for future reference.	*This is usually completed in a cattle race or crush so that the keeper can maximise safety, and read the ear tags (wiping them clean, moving hair, where necessary).*
Access paper documents – transit time from the beast handling/crush area to where paper documentation is stored.	*Holding Register and passports are usually stored in a farm's office or other building.*
Locate the passport for said beast and confirm it is the correct passport by checking the unique identifying number on the passport.	*Time taken is variable depending on how many beasts are held on the holding and the proficiency of filing.*
Manually record the date of movement and sign the passport.	
Locate holding register or sign-in to third party software with online holding register.	
Manually record date of movement, holding to which moved, and name and address or CPH of person taking delivery.	*Subject to transcription error risk, e.g., if CPH number is incorrectly transcribed.*
Accuracy Check – confirm passport and Holding Register have been correctly updated and tally with each other.	
Report movement to British Cattle Movement Service. Means of contact are: CTS Online website or via third	*Movement cards can be used for beasts with passports issued in 2011 or before; the keeper would also need*

party software, telephone – automated service, telephone – in person, or post the movement card.	*to convey the freepost movement card to a post box.*

Table 1: 'Off' movement administrative process for a cattle keeper

Holding Registers, whether paper-based or a standalone on-farm software, usually require authorities to physically attend the holding to review it, which will inevitably cause delays at the point of a confirmed disease outbreak. Manually updating passports, even using sticker barcode labels for legibility, is time-consuming for keepers. The SI allows for registration of beasts in writing and 'movement cards' to be used to report some cattle movements by post. A paper-based traceability system inherently causes delays in the timely capture and visibility of data that may be needed at the point of a confirmed disease outbreak; given digitisation and widespread use of the internet in society, it is also becoming increasingly antiquated.

Issuing and amending cattle passports is resource intensive and costly to Government. It is paper based, with significant material costs: paper, printing, sticker barcode labels, envelopes, and postage. According to BCMS data, cattle passports cost approximately £1.5 million per annum to administer, including printing and posting costs per month of approximately £23k and £25k, respectively. Free post movement cards from cattle passports issued prior to August 2011 are still being manually processed - according to BCMS data, over 2500 were received in 2021.

Requiring keepers to make records in a Holding Register, on cattle passports, and report the same or similar information to the British Cattle Movement Service causes a duplication of burden for keepers, and risks causing unnecessary confusion: over time these two records can diverge through simple unintended transcription errors.

Single ended reporting is flawed:

The CIR 2007 require keepers to report only the 'on' movement to their holding or the 'off' movement, essentially making two keepers responsible for reporting the whole movement of a beast. This process creates the possibility of unreconciled movements where the information provided by one keeper does not tally with the information provided by the other keeper. For example, the date on which an animal arrives on a

holding preceding the date it left its previous holding. These traceability gaps compromise Government's ability to respond quickly and effectively to a disease outbreak. This is further compounded by the functionality of CTS which can only accommodate these single-ended 'on' and 'off' movement reports and not a single report of a whole movement. This restriction causes the British Cattle Movement Service to use resources for manual enquiries to clarify information or to fill in gaps if a keeper fails to report either the 'off' or the 'on' movement.

Enforcement and inspections:

The CIR 2007 regulations set out a number of offences: the vast majority are absolute in nature, with no acknowledgement that the reasons why keepers may commit an offence are various, e.g., simple human error, reasonable excuse, or guilty intent. Questions around proportionality and necessity are also relevant, e.g., one physical act or omission may leave a keeper liable for multiple offences.

The CIR 2007 makes positive requirements on keepers, and provides strong powers for Inspectors, for example, powers of entry, removal and retention of documents, and movement restrictions. A 2015 amendment also afforded Inspectors a power to use reasonable force.

Some definitions within the regulations are not covered in the preamble and remain vague and subject to interpretation, e.g., 'duly authenticated document', 'reasonable hours', 'safe place', or 'required information'. The stated cases for these regulations shed no further light on their respective interpretation.

Sentencing powers under this SI are strong: triable at Magistrates' or Crown Court, with a maximum custodial sentence of two years. Enforcement of this SI principally falls to Local Authorities who are often perceived to have other significant pressing priorities.

Under Section 80 of the Animal Health Act 1981, an annual report is published which shows the number of proceedings at Court undertaken by Local Authorities in relation to cattle identification, movement and record regulations. This report covers both England and Wales, therefore includes proceedings undertaken in relation to the

Cattle Identification (Wales) Regulations 2007, as well as CIR 2007. In the last five years, 2017 to 2022 inclusive, the Section 80 reports show sixty-six reported convictions in England and Wales for that five-year period: an average of just over thirteen convictions across England and Wales per year. Over time the SI has not been subject to sustained judicial oversight due to the low number of prosecutions that have taken place. It is also to be noted that local authority enforcement activity also includes advice and guidance, farm visits, and warning letters.

Other proscriptive regulations concerning the cattle identification inspection regime and disease control and the link to direct payment schemes have created a stringent inspection regime which significant numbers of keepers fail. Those keepers in receipt of a subsidy payment who fail have cross-compliance penalties deducted from that payment, and on occasion, this amount may appear high relative to the apparent infraction.

It has been the cross-compliance on-farm inspection regime that has held keepers substantively to account, rather than prosecutions led by local authorities. This is flawed as any financial penalty can only be issued to subsidy claimants, non-claimants are inspected but not subject to any financial loss. The inspection regime is also not routinely subject to judicial oversight; there is, however, an independent appeals process administered by the Independent Agricultural Appeals Panel (IAAP). CIR 2007 is a strong piece of regulation, undermined by low levels of enforcement activity by Local Authorities on the one hand, and by a narrowly focussed inspection regime on the other.

Variance in time limits adds complexity:

The CIR 2007 sets out twenty-one deadlines for keepers to carry out a specific activity. Of these twenty-one deadlines, there are nine variances, from ‘within’ 36 hours, 3 days, 7 days, 14 days, 15 days, 20 days, 30 days, one month, and nine months. If a bovine keeper also keeps other livestock, then they will also have to comply with numerous time deadlines within other species-specific regulations.

Variance in the time limits to apply ear tags, record and report births, movements, and deaths, both by type of event and type of bovine, has brought additional complexity which reduces clarity and ease of understanding for keepers.

This complexity, coupled with the requirement to both record and report births, movements, and deaths, has likely contributed to inadvertent errors and, therefore, inaccuracies in cattle traceability data. The complexity is further exacerbated if a keeper has other livestock in addition to cattle, with the requirements for traceability and identification regulations for sheep and pigs at variance to those for cattle.

Regulatory context has evolved over time:

The CIR 2007 and its complementing Statutory Instruments in Northern Ireland, Scotland, and Wales are the bedrock of the nation's cattle traceability system. The robustness of the cattle traceability system manifested by the CIR 2007 allows for a constant state of preparedness for exotic disease outbreak, assists ongoing endemic disease control activity, supports animal and welfare standards, and ensures our ability to trade in beef and dairy, both at home and abroad. This is achieved by the provision of reliable traceability information, not least the lifelong individual unique identifier per beast, stringent control of the issuance of ear tags, timely and validated birth and death registration and movement data, diligent inspections and the excellent management of this data by the British Cattle Movement Service.

The context that CIR 2007 operates in has evolved over time. Technology and digital connectivity, the practices of the cattle industry, and the geopolitical and economic landscape have evolved significantly since the commencement of the CIR 2007. The system of subsidies for cattle keepers has markedly evolved since the commencement of this SI, not least due to the exit of the UK from the EU. The estimated costs and benefits listed in the CIR 2007 Impact Assessment have largely become redundant.

The then Secretary of State made the CIR 2007 under section 2(2) of the European Communities Act 1972; multiple elements of retained EU regulations are enforced via this SI, including elements of retained EU Council and Commission regulations 494/98, 509/1999, 1760/2000, 911/2004, 644/2005, and 1069/2009. Post EU exit, these regulations now fall within the remit of the Retained EU Law (Revocation and

Reform) Bill currently before Parliament. The CIR 2007 currently differentiates between EU member states and third countries/those falling outside the EU.

Business operating models for farms, farming methods, supply chain design, consumer expectations and market access have all evolved since 2007, as have the technologies used by farms, livestock markets, and slaughterhouses. Digital connectivity has also improved significantly albeit coverage is less than universal especially in more isolated rural areas. Schemes such as "Shared Rural Network" have been designed to improve digital connectivity, with an aim of providing 95% 4G network coverage across the UK by 2025. The Gigabit Broadband Voucher Scheme also aims to improve rural connectivity and speed of internet connections. There is an imperative to maintain the highest standards of traceability, and through the use of better technology, there is also an opportunity to modernise and streamline the cattle traceability system.

Proposals

Re-draft the CIR – update, consolidate, and streamline:

There is scope for the CIR 2007 to be re-drafted, and the regulations therein, to be modernised and streamlined to improve cattle traceability, reduce administrative burden for keepers, and improve clarity and ease of understanding. An assessment of the twenty-one deadlines made by the CIR 2007 should be undertaken to confirm if they are still appropriate. A legal requirement for keepers who no longer keep cattle to de-register their holding should also be considered. Livestock disease outbreak and transmission occurs across species – bovine, ovine and porcine, and as such the cattle traceability system should be aligned and interoperable with the systems for sheep, goats, and pigs.

Introduce whole movement reporting:

Enable whole movement reporting, eliminate single-ended reporting, and ensure the planned successor for CTS can log whole movements and has sufficient flex to iteratively develop as technology and processes progress in the future.

Introduce Bovine Electronic Identification (BeID):

Replace conventional visual only ear tags with electronic identification ear tags which will immediately speed up the reading rates of ear tags at high animal throughput locations, such as cattle markets and slaughterhouses, and boost the accuracy of read by eliminating the risk of manual transcription errors. In turn, third party software is already available that will allow for the BeID read to access the digital record of a beast, again speeding up the timeliness and accuracy of traceability data.

Remove paper reporting and phase out paper cattle passports:

Technology and animal disease threats have evolved since 2007. Paper-based processes are too slow and burdensome for both the cattle industry and Government. Technology is available now to provide an entirely digital solution to cattle traceability, which in turn, would allow for the shortening of deadlines for reporting births, movements, and deaths of cattle thereby creating a better traceability picture at the point of a confirmed disease outbreak. BeID allows for the removal of holding registers and the phasing out of cattle passports.

Improve enforcement activity:

A more collaborative approach with keepers to ensure early intervention and support for those who need it. More targeted intelligence-led enforcement activity towards holdings and keepers that are, through intentional traceability non-compliance, at higher risk of disease outbreak or spread. Better joint working to improve traceability data capture, and enforcement activity across England based on threat, risk, and harm of disease outbreak, regardless of subsidy status.

Drafting to be futureproofed as much as practicable:

Unforeseen changes will occur – events, type of disease of outbreak, technological advancement. Re-drafting of the CIR must be evidentially based and needs to be as forward-looking as practicable.

Conclusion

The overarching objectives of the CIR 2007 at the time of drafting were to maintain and improve cattle traceability for disease control and subsidy management purposes; and make resource savings for industry and Government. The objectives have been met. There is now no longer a requirement for this SI to support EU subsidy management.

The CIR 2007 is effective but now relies heavily on outdated processes. Single-ended reporting, continuing reliance on paper recording and reporting, a three-day deadline for reporting movement, human intervention to manage the system and remedy anomalies, and inconsistent enforcement by geography and type of keeper, all present risks to cattle traceability at the point a disease outbreak is confirmed. This post-implementation review highlights the importance of an effective regulatory framework for cattle traceability and the need to re-draft and modernise the Cattle Identification Regulations 2007.

Annex: PIR Cover Sheet

Title: Cattle Identification Regulations 2007	Post Implementation Review
PIR No: N/A	**Date: 21/11/23**
Original IA/RPC No: N/A	**Type of regulation: Domestic**
Lead department or agency: Department for Environment Food and Rural Affairs	**Type of review: Statutory**
Other departments or agencies: N/A	**Date measure came into force: 06/04/2007**
	Recommendation: Replace
Contact for enquiries: **S. COVERLEY**	**RPC Opinion: N/A**

1. What were the policy objectives of the measure? (Maximum 5 lines)

The Cattle Identification Regulations (England) 2007 updated and consolidated seven Statutory Instruments into one regulation, whilst stopping the use of temporary calf passports, and enabling both use of DNA for late calf birth registrations and electronic reporting procedures. Overarching objectives were to maintain and improve cattle traceability for disease control and subsidy management purposes; and make resource savings for industry and Government.

2. What evidence has informed the PIR? (Maximum 5 lines)

The Regulatory Impact Assessment for the regulations was reviewed, stakeholder views from the cattle industry have been sought, as well as the arms lengths bodies RPA and APHA. There is an absence of substantive data to establish the direct impact of this SI. No monitoring and evaluation plan is extant, nor was baseline data set at the outset. Given the lapse of time since commencement, it has been difficult to obtain relevant quantitative evidence.

3. To what extent have the policy objectives been achieved? (Maximum 5 lines)

The SI requires keepers to provide accurate and timely data about the identification, registration, and movement of cattle, bison, and buffalo in England. This enables Government to trace beasts at risk of disease or involved in a food safety incident. The SI underpins endemic disease control, such as bovine TB, and facilitates preparedness for exotic disease outbreak. The consolidation has been effective albeit the SI is now outdated.

Sign-off for Post Implementation Review: Chief economist/Head of Analysis and Minister

I have read the PIR and I am satisfied that it represents a fair and proportionate assessment of the impact of the measure.

Signed: Nancy Race

Richard Benyon.

Date: 21/11/2023

Further information sheet

Please provide additional evidence in subsequent sheets, as required.

4. What were the original assumptions? (Maximum 5 lines)

Simplification and consolidation of the pre-existing regulations would bring improvements.
Adherence to new EU regulation would remove the risk of infraction proceedings.
Efficiency savings for British Cattle Movements Service and facilitate development of Defra Livestock Register.
England had 2/3 of UK cattle population at drafting so 2/3 of costs likely incurred by England.
Number of animals on a holding dictates likely impact of amendments on a holding.

5. Were there any unintended consequences? (Maximum 5 lines)

Unreconciled single-ended movement reporting creates traceability risks which are ongoing and resource intensive to remedy. Passport and other paper-based administration is slow, burdensome, and costly. The duplicity of recording and reporting requirements for keepers has reduced clarity. Local Authority enforcement activity is low with few prosecutions and limited judicial oversight. Differing regulatory time limits has reduced ease of understanding.

6. Has the evidence identified any opportunities for reducing the burden on business? (Maximum 5 lines)

The introduction of bovine electronic identification, couple with an improved database for cattle tracing, could allow for the removal of cattle passports and holding registers, which would represent a significant lifting of burden for keepers. Reporting of births, movements, and deaths of bovines digitally by default would also reduce administrative burden.

7. How does the UK approach compare with the implementation of similar measures internationally, including how EU member states implemented EU requirements that are comparable or now form part of retained EU law, or how other countries have implemented international agreements? (Maximum 5 lines)

Cattle identification is a devolved matter. The SI has significant EU regulation embedded, ensuring England was aligned with the EU while the UK was a member state. EU member states have equivalent cattle traceability systems: centralised database, equivalent issuance and control of unique animal identifying numbers and ear tags, cattle passports, and holding registers. EU member states require holding registers records to be kept for three years; the requirement in the UK is ten years.