

BVA and BCVA response to Scottish Government's consultation on cattle identification and traceability in Scotland

27 June 2024

Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,500 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) The British Cattle Veterinary Association (BCVA) represents around 1,700 veterinary professionals, principally working with livestock in the UK. Most members are in farm and mixed practices. BCVA also represents those studying and working in industry and academia.
- 3) We welcome the opportunity to contribute to the consultation on the Scottish Government's consultation on cattle identification and traceability in Scotland.

Question 1 – Do you support use of electronic ear tags as an official means of identification in cattle?

- 4) We support the use of electronic ear tags as an official means of identification in cattle. It is consistent with both Scottish Government's and UK Government's principles of 'digital by default' and moving towards paperless transactions and has great potential to increase accuracy, reduce recording, transcription and potential subsequent certification errors and increase the health and safety of those involved in such tasks.

Question 2 – Should ultra-high frequency (UHF) or low frequency (LF) technology be used?

- 5) We think that ultra-high frequency (UHF) technology should be used due to its greater effective reading range. It is much safer for those recording animal ID numbers at all Critical Control Points (CCPs) both on farm and off, such as abattoirs, marts and collection points. The United States Department of Agriculture (USDA) approach proposed is consistent with current numbering standards and can be applied to historical herds' numbering.
- 6) It is imperative that any solution in Scotland takes on board and is compatible, inter-operable and ideally identical with those being taken forward in the other three devolved regions of the UK. This is part of a fundamental and essential component of an efficient and error-free system for animal and public health traceability purposes both in the technology employed, and the numbering system.

Question 3 – Do you support the use of any other forms of electronic identification as official means of identification (either as primary or secondary identification)?

- 7) To an extent electronic intraruminal boluses have potential as secondary identification but the primary means should in all cases be the ear tag. This makes it clear when an animal has lost its tag both visually and electronically, whereas loss of a bolus would only be detectable electronically.
- 8) Limiting the statutory identification device/location to a tag in the ear also provides certainty to those veterinarians who are required to assuredly identify the animal for animal health, public health or export certification purposes.

Question 4 – Do you agree that there should be a legal requirement for new-born cattle to be identified with electronic ear tags?

- 9) Yes, please see Q1 for our reasons.

Question 5 – If yes to Question 4, should current tagging exemptions remain or should other categories of animals be exempted?

- 10) Yes, please see Q3 for our reasons.

Question 6 - Do you think that there should be a requirement to identify animals in the 'historical

herd' (animals which are alive and are already identified) if and when EID is introduced?

11) This should be offered as a voluntary option for herds for a prescribed period. We suggest upon more than three years thereafter we believe it is essential that all "legacy" animals are EID'd.

Question 7 – If so, should there be a requirement to apply EID to all animals in the historical herd by a certain date or should the need to use EID be 'event driven'?

12) We think it should be event driven but with a reasonably long lead towards complete digitisation. It should become mandatory after three years, so as to allow for the proper realisation of the benefits of increased accuracy and health and safety (when reading / recording tags) to veterinarians, farm, market and abattoir workers and others. It should reduce the inefficiencies of two systems running in parallel, which must only increase once >50% of the herd is EID'd.

Question 8 – What are your views on introduction of an online holding register?

13) BVA and BCVA are in favour of introducing an online holding register. As long as it is accompanied with 'real time' event logging has long been an aspiration for both commercial reasons and disease surveillance.

Question 9 – Should reporting timescales for births, movements and deaths for holding registers and the central database be aligned?

14) Yes, they should be aligned.

Question 10 - If yes, what should they be?

15) They should be aligned to the tagging deadline. There could be the opportunity to reconsider these where appropriate, such as with bison.

Question 11 – What are your views on the removal of paper passports?

16) Our view is that it should be 'digital by default' so given the ability to confirm an animal's identity, provenance, health status by real-time access to an online register, we think that paper passports should safely be removed but the ability to print off documentation as backup should be retained. This will greatly reduce the administrative burden.

Question 12 - Do you have any other comments on the way this consultation has been conducted?

17) No.

Question 13 - Do you consider that the consultation explained the key issues sufficiently to properly consider your response?

18) Yes.

Question 14 - Do you consider that you had sufficient time to respond to the consultation?

19) Yes.

Question 15 - Do you have any other comments regarding any proposed future changes to the cattle ID Regulations?

20) This could provide an opportunity for Scotland to lead the way in the UK towards digitisation and centralisation of animal ID and to drive change, but this must not be at the price of disrupting the national UK-wide system of traceability.