**CROSS COMPLIANCE AND SHEEP EID : IMPLEMENTATION FOLLOWING RESPONSE FROM EC TO SCOTTISH PROPOSAL**

Q.     **What was the Scottish proposal for EID record keeping tolerance?**

The Scottish proposal to the EU Commission, which took account of the significant investment in the ScotEID database, was that farmers should not be subject to cross compliance deductions when moving stock off their holdings via Critical Control Points (CCPs). Some flexibility was also sought in relation to on moves via CCPs.

Q.     **Does the Commission response mean that farmers will not face cross compliance deductions for inaccurate farm records resulting from misreads at a Critical Control Point (CCP)?**

The flexibilities we have secured from the European Commission are that sheep farmers selling animals **off** through a CCP can rely on the CCP reads uploaded to ScotEID to provide the individual IDs required as part of their flock records. Where 100% read rate is not achieved, cross compliance deductions to the consignor's single farm payment will not apply provided all other elements of the sheep identification and traceability rules have been followed.

In addition some limited flexibility has been achieved in respect of moves **on** to a holding through a CCP which will limit cross compliance deductions for purchasers. Farmers moving sheep **on** to their holding through a CCP must still ensure most if not all of individual IDs have been read if they are to avoid deductions to their Single Farm Payment and other support payments and ensure that all other elements of the sheep identification and traceability rules have been followed.

Q.     **What does this mean for farmers who will be selling breeding sheep at the autumn sales?**

They should continue to tag animals in line with the regulation (animals destined for breeding or slaughter beyond 12 months of age require two tags one of which must be electronic). Farmers should ensure that when tagging their animals they update the 'record of identification' in the flock register. The farm records should also contain complete movement records; including the date of the movement, the number of animals moved, destination and the haulier's details. The CCP reads can be relied on to provide details of individual IDs.

Q.     **What does this mean for farmers who will be purchasing breeding sheep at the upcoming autumn sales?**

The farm record should contain complete movement records; including the date of the movement, the number of animals moved, the origin of the animals, Critical Control Point reads can be relied on to provide details of individual IDs.

Purchasers should however ensure that most if not all animals have been read – the best way to do this is by logging on to the ScotEID database www.scoteid.com  and checking their on moves.

It is advisable for bio-security reasons to keep purchased animals separate from the main flock for a time. This allows an opportunity to check www.scoteid.com and if concerned that the number of reads is low you should re–read the batch and record the individual numbers

in your records or upload to www.scoteid.com. EID readers are now commercially available at a reasonable cost.

Where only single animals (e.g. tups) or small lots are purchased, purchasers may wish to read and record the individual tag numbers in the flock records in order to ensure compliance.

Q.    **What about selling single 'slaughter' tagged animals?**

Farmers should continue to tag animals in line with the regulation (If lambs are intended for slaughter at under 12 months they should be tagged with a single electronic 'slaughter' tag.). Farmers should ensure that when tagging their animals they update the 'record of identification' in the flock register. In the farm records the seller should include the date of the movement, the number of animals moved, the destination and haulier's details. CCP reads can be relied on to provide details of flock marks and numbers per flock mark for mixed batches.

Q.    **What about purchasing single 'slaughter' tagged animals?**

In the farm records the purchaser should include the date of the movement, the number of animals moved, the origin of the animals. CCP  reads can be relied on to provide details of flock marks and numbers per flock mark for mixed batches. Remember if store lambs have already been double tagged they are subject to the full EID rules.

Q.    **Are these rules likely to change in future?**

The Commission have stressed that setting up a cross compliance sanction is the responsibility of the Member State authorities and not subject to any procedure of validation or approval at EU level – the cross compliance sanction is tested at audit and we may have to revise our system in the light of audits whether in Scotland or elsewhere.

In addition the flexibility afforded to Scotland is on the basis of the progress made in implementing our database. In order to retain these flexibilities we must be able to demonstrate continuing improvements in read rates and continue to monitor tag quality and retention rates.

Farmers have a large part to play in this by ensuring tags are inserted correctly and that good quality tags are used.

Q.    **Does this mean that farmers selling sheep can simply relax and not worry about tagging correctly when moving sheep off farm?**

No – farmers must continue to comply with the tagging requirements as laid out in the legislation, by tagging sheep correctly for age. As above they should ensure tags are inserted correctly and that good quality tags are used.

Sheep keepers should also ensure that they are using the slaughter derogation correctly and can monitor their own read rates by consulting www.scoteid.com  regularly. If keepers do not have access to the internet they can contact ScotEID on 01466 794323 for information and assistance on obtaining read rates.

It is important to consider customers. If purchasers think that consignors' tagging practices are poor and that this may lead to compliance difficulties then they could decide to look elsewhere.

RPID will also consider how read rates can be used to guide inspection selection – i.e. those consistently achieving discrepant rates may find themselves more likely to receive an inspection.

**Q    Having received this encouraging news on EID does this mean we can expect to see a reduction in the number of sheep farmers who are subject to cross compliance penalties?**

EID is only one element of the sheep identification and traceability rules which can lead to cross compliance deductions. Sheep keepers must ensure that they meet all the requirements in order to avoid penalties. They should pay particular attention to the tagging and recording requirements including retagging of any sheep which lose tags and completing a retagging record. Scottish Government issued all sheep keepers with new Flock Register booklets in Spring 2011. These booklets allow all the information required by the regulations to be recorded. They can be downloaded from here: http://www.scotland.gov.uk/Topics/farmingrural/Agriculture/grants/A-Z/MovementRecords/SheepandGoatsFlockregstr

**Q    What is the position for farmers who trade animals privately?**

If sheep are traded or moved other than through a CCP then both the consignor and the receiving farmer must record all individual IDs of full EID tagged animals. The flexibility provided by the Commission only apply to movements through a CCP.

**Q    How else can ScotEID help farmers comply with the regulation?**

Farmers may choose to use the on line register which is being developed to allow farmers to keep their records on line. The system is compatible with most farm software systems, EID reads through CCPs are automatically entered and it also allows farmers to update the system manually when animals are tagged, move or die. Further development will involve recording of  replacement tagging and show moves. Further advice on using the online register is available at www.scoteid.com.

**Q    What are the requirements for farmers who discover animals with missing tags?**

They should retag the animals within 28 days of discovering that the tags are missing following the guidance issued by Scottish Government along with the new Sheep Movement Pads in May 2011 and in the Sheep and Goat Identification and Traceability – Guidance for Keepers booklet issued in January 2010. They should record the retagging in the record of retagging provided in the new style holding register issued in May 2011 - within 48 hours of the retagging being carried out.

All sheep keepers are advised to have a stock of red replacement tags for use when sheep not born on the holding lose tags. Remember while red tagged sheep can only be exported live if full traceability from holding of birth is available, there is no restriction on the export carcase market.

**Q     What do sheep keepers need to do when sending sheep to grazings e.g. for wintering?**

If sending sheep to grazings on another holding but ownership of the sheep is not changing then the move can be recorded at batch level e.g. 100 ewe hoggs with flock mark UK 123456  moved to 999/9999 . This should be recorded as an off move in the continuous register within the new holding register booklet.

The sheep must be correctly tagged for age. If it is the first time the animals have been tagged they should be entered in to the record of identification also provided in the new style register.

Remember the sheep should also be recorded as moving on to the holding in the holding register of the farm which the sheep have moved to. When the sheep return to the home holding the procedure is reversed.

All movement documents should be completed and submitted to SAMU.

**Q     What do feeders need to do if one sheep out of a batch loses a tag?**

If a lamb which has been purchased as part of a batch of feeding (store) lambs is discovered to have lost a tag, then the new owner should replace the tag  with a red replacement tag with his own flock mark within 28 days of discovering the loss.  He should follow the guidance provided in May 2011 and January 2010. He should also record the retagging in the record of retagging provided in the new style holding register issued in May 2011 within 48 hours of the retagging being carried out.

Background notes:

−   3% of sheep/goat keepers holdings are randomly selected and inspected each year to assess compliance with the rules on identification and recording.

−   Critical Control Points ( CCPs ) are markets/abattoirs and ferry ports approved in Scotland to record EID tag numbers and provide them to keepers via the ScotEID database www.scoteid.com  for their farm movement records.

−   All lambs must be tagged before they reach 9 months of age or before they leave the holding of birth whichever is sooner. If lambs are intended for slaughter  at under 12 months they should be tagged with a single electronic 'slaughter' tag. Animals being retained beyond 12 months of age must be double tagged and one of the tags must be electronic.

−   'Slaughter' tagged animals: A derogation is in place for moving animals intended for slaughter before 12 months of age. Individual IDs need not be recorded, but the total number of lambs moved with each flock mark should be recorded.

- Further guidance is available at - http://www.scotland.gov.uk/Publications/2010/02/08120157/0