COUNTRY LAND AND BUSINESS ASSOCIATION

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

Introduction
The Country Land and Business Association (CLA) represents more than 35,000 land managers and rural businesses in England and Wales who between them own and manage some 50% of the rural land. A considerable proportion of our members are involved with livestock in some degree and thus the movement rules are of considerable interest to them.

The Questions
Q1. Views are invited on the impact of the proposals on individual businesses/sectors.

The CLA would like to point out that it is only when we have the detail of the Governments plans that we will be able to answer this question with any confidence. What we feel should be pointed out that we cannot approve of a policy which states that “normally there will be a single CPH for all land within 10 miles radius of the place of business.”

This is no place for a heavy handed ‘one size fits all’ ruling. It is perfectly possible that a single business will wish to run enterprises totally separately, so that, for example, sheep and Dairy cattle may be run on entirely separate holdings, and the keeper is happy to notify BCMS or submit an AML1 form on the rare occasions when animals to move between the two holdings. Not being able to do this would increase cost, administrative complexity, and show no gain animal health and welfare.

The CLA prefers “a keeper may have a single CPH for all land within 10 miles radius of the place of business.”

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

The CLA would point out that the ‘place of business’ might not be within ten miles of any of the land farmed. It should be noted that there are many examples of young people starting in farming who have control of scattered land parcels but who may still live with their parents in a nearby town.

The CLA would suggest that the keeper be allowed to fix the centre point from which the ten mile radius is measured.

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

a) Whilst pointing out that the CLA does not agree that “All land parcels (including any buildings) under the same management and control will normally be included in the same CPH number” we think that the other proposals in point (i) provide a good base for future discussion on the more detailed final regulation.
b) Again, we feel that the proposals in point (ii) provide a good base for future discussion on the more detailed final regulation. As always the devil will be in the detail.

c) The issue of commons is inevitably complex, mainly because both the nature of commons and the traditional systems of management of commons differ considerable across England. Therefore the CLA would recommend that the issue of coverage of commons be dealt with in a separate consultation. As an example of the complexity, whilst on some commons the livestock is either ‘on the common’ or it is ‘on the in-bye land, on other commons, some keepers will, at some times of year have the gates open so that stock can wander between the common and part of the in-bye at will, (as an example this might be necessary if water sources are seasonal) thus making reporting of movements between the two areas impossible.

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 reasonable interval would be based on the length of tenancy of the land. If the land is rented for four months even a six month association is too long, similarly if the tenancy is to be for five years, then there is no reason why the temporary CPH should not last for the full five years.

There is merit in considering whether the association should lapse automatically at the end of the tenancy, as this will ensure that the new tenant doesn’t have the complications of an existing association that they might have no way of knowing about.

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.

The existence of both CTS Links and SOAs did cause confusion. That being said the CTS link is a fine example of how to set up an association between two holdings simply and quickly with the minimum of bureaucratic fuss and expense. Inevitably some businesses will be handicapped but if all land within a ten mile radius may voluntarily be included in the same holding, and if the system of isolation facilities is simple, economical and workable, this handicap could be minimised.

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

Provided the reorganisation of CPH and associations is complete, it should then be reasonable to abolition CTS Links and SOAs. However they should not be abolished until the other system is up and running, there should be no arbitrary deadline for this, but should be dependent upon the successful working of the new system.

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.
The CLA believes that the introduction of a workable system of Isolation Facilities is an integral part of this simplification process. If we want to increase traceability and improve animal health it is vital to get this bit correct.

That is why we are so saddened by some of the suggestions made. Isolation Facilities are supposed to be to assist the industry, not to provide a cash cow for Animal Health.

- Throughout the last few years there has been a policy of reducing inspections and combining those that have to be made, and this document goes entirely against this sensible policy by introducing a new inspection process at a cost which bears no relationship to the profitability of the enterprise being inspected.

- Indeed the CLA would pose the question, if the Keepers own vet, many of whom are regarded by Animal Health as perfectly competent to work on the front line in the fight against bTB, FMD etc, has agreed to the Isolation Facility, why is it necessary to go to the expense of sending yet another vet to look at it?

The CLA would suggest that

- There is no need for Animal Health to inspect every application. If the farm involved is one regarded as a high risk, it can be targeted under the annual CTS programme.

- If there are inconsistencies being thrown up in the paperwork or doubts about how animal movements are being handled, then the local Trading Standards Department is perfectly competent to drop round and check matters.

- Only a perverse imagination could introduce Annual inspection as part of a ‘simplification’ process. The CLA feels that this is unwarranted and seems aimed more at ensuring a steady cash flow for the inspectorate than it is driven by animal health considerations.

When looking at the “Suggested requirements for operation of Isolation Facilities” we see much to commend. However we would draw attention to the requirement “Public access through such fields would be undesirable and may make them unacceptable where a footpath traverses other fields used by livestock.”

Keepers have had some years of being told that the general public walking through fields were not a health risk, and that there might even be a presumption against closing footpaths in a major disease outbreak except in the area very close to an outbreak. The CLA would point out that not allowing isolation facilities where there are public footpaths is in danger of sending out ‘mixed messages’ on this issue.

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

This will vary greatly between businesses. For example a suckler cow and sheep enterprise might need three but only for a month, whilst another enterprise would find that they only want one but will use it during most months.

That is why flexibility is vital. We need a system where the farmer can phone up giving the field or building numbers from the maps and have the Isolation Unit put into place within a few hours rather than some bureaucratic process demanding considerable form filling and leisurely and expensive visits.
Q9 Views are invited on the proposals for permanent sheep and goat movement reporting arrangements.

Whilst the CLA can see the logic behind these proposals, and can see the sense in having things ready, we would also note that sheep keepers have had to live with a veritable blizzard of changes to regulation over the past few years. We would suggest that the current EID system be given time to bed down and to sort out the inevitable teething problems, before people are confronted by yet another reform. This will also give time for the introduction of the simplified CPHs and Isolation Facilities. We would suggest that only when both systems are working properly will it be sensible to consider including sheep fully within the system. We would recommend the words of Ralph Waldo Emerson "A foolish consistency is the hobgoblin of little minds"