

Regulation EC No 21/2004 impacts
on Shetland Sheep Farmers for
Spanish Delegation March 26th
2013



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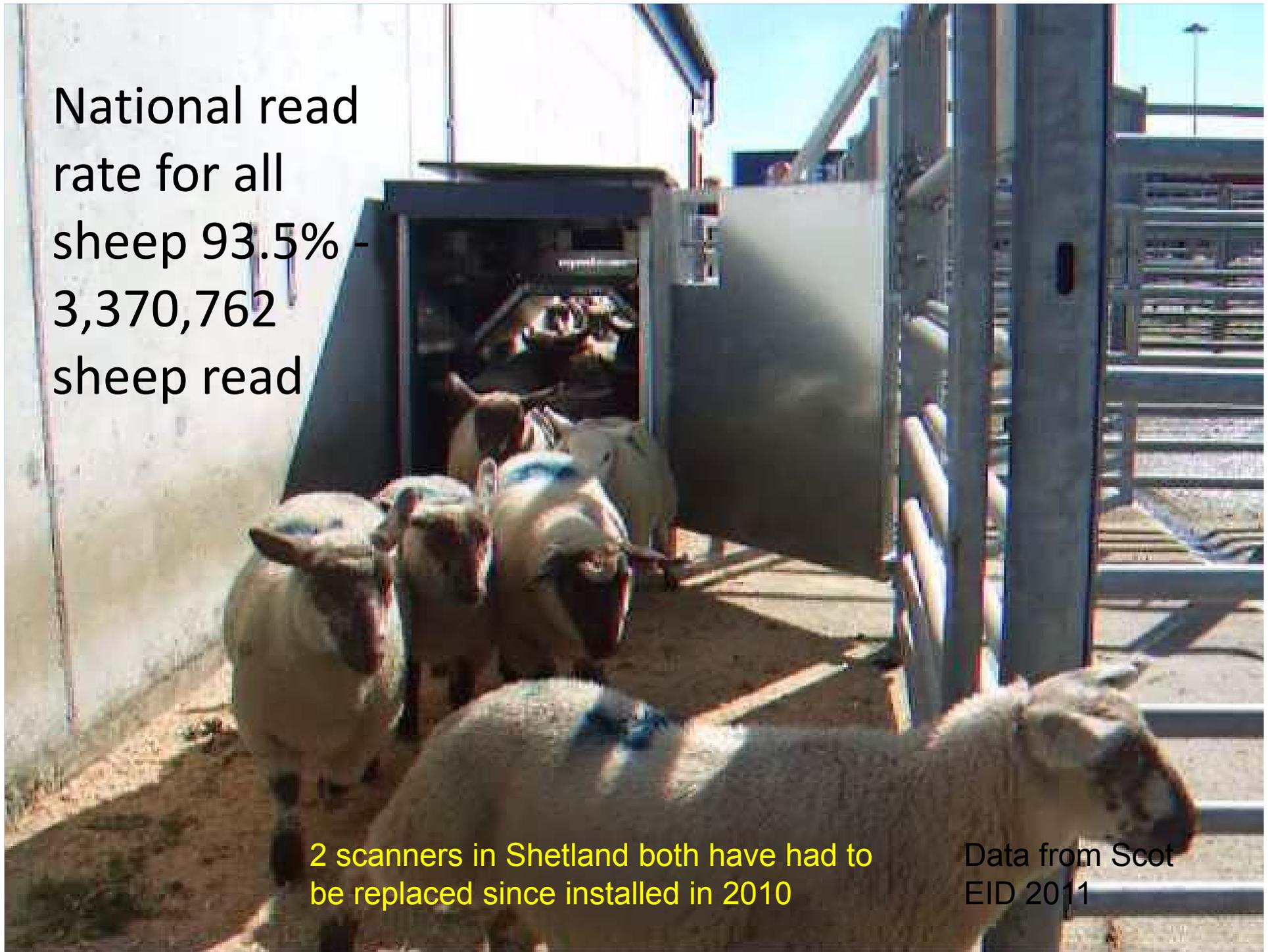


Technology not fit for purpose
Impractical recording requirements
Animal Welfare
Cross Compliance Penalties
Complexity
Stress

National read
rate for all
sheep 93.5% -
3,370,762
sheep read

2 scanners in Shetland both have had to
be replaced since installed in 2010

Data from Scot
EID 2011





It is estimated that read rates will decrease by 3 % ever 600 days.

At current read rates a group of ewes culled at 8 years old would have an estimated read rate of 84%

Data from Scot
EID 2011 and
SAC



Applying tags is problematic if they become damp.
This year arrived enclosed in sachets to ensure remain dry!



Cost of EID

- Cost of electronic slaughter tag £0.84 (1.06 Euro)
- Average sale value of Suffolk cross lambs 2012 season - 544 lambs sold at average £59 (74 Euro)
- Cost of tag as a percentage of sale value - 1.4%, more like 2% for smaller lambs
- Additional costs – scanners, tag applicators, office time, animal handling time, inspectors time, administration time.

Missing/Dead (July/August)	294	390	363	229
Missing/Dead (November)	72	88	N/A	N/A
Total Sheep	3,600	3,600	3,500	3,500

An example of the practical problem: Counts from a farm in Shetland's North Mainland with 3,500 Shetland ewes on 2,600 hectares

Sheep gathered twice a year, once in July for clipping and once in September/October for weaning and casting. Sheep are gathered in 400 ha blocks, which contain 500 sheep each. It takes five workers an entire day to complete one block. It is impractical to go back for a few stragglers.

Another example:

A farm of 7000 ha with 2000 breeding ewes.

2011 inspection: 3% penalty for not entering a run of individual tag numbers in his register.

Approximate penalty £6,000 (7,581 Euros)

Time line of Shetland Actions

- Oct.2009 - Request to Scottish Government that only sheep entering and leaving Shetland would require recording of individual identities
- June 09 - Legal opinion gained on challenging (EC) 21/2004
- Nov. 09 - Letter to Kai Sprenger requesting the use of batch recording within Shetland.

- Oct. 2010 - Presentation at Advisory Group on Sheep and Goat Meat. Brussels.
- Raised issue at sheep veterinary assoc. Sept 2009 and Sept 2011
- June 2011 – Letter from Tavish Scott MSP to Scottish Government requesting review of legislation
- July 2011 – Letter to Dacian Ciolos requesting sheep only need individual ID when leave holding of birth
- Spring/Summer 2012 – Surveys to assess impact of EID in Shetland

Background to Questionnaire Study

- From 2009 sheep farmers begin to report their concerns on the impacts of EC 21/2004 to the Shetland Island Council (SIC) via the Agricultural Panel.
- Initial survey carried out by SIC in 2010/11 identified problems with ear damage and tag losses in Shetland flocks.
- Spring 2011 Alyn Smith MEP provides resources and publicity to enable a survey to look at wider impacts of EC 21/2004.

Methodology

- 928 questionnaires were sent out to members of Shetland Livestock Marketing Group on the 4/7/12
- This was followed up by the Shetland NFU and Crofting Federation at local shows and events through the summer.
- In total 283 completed questionnaires were received with a return rate of 30%

Results

Question: Have you had problems with the following as a result of sheep EID?

- Applying sheep tags?
- Sheep with damaged ears?
- Sheep losing tags?
- Keeping a record of individual sheep numbers?
- Additional costs of tags and equipment?

	% of respondents who ticked
Applying sheep tags?	57%
Sheep with damaged ears?	87%
Sheep losing tags?	91%
Keeping a record of individual sheep numbers?	81%
Additional costs of tags and equipment?	89%

Question

Do you feel that you fully understand the EID Regulation?

(on a scale of 1 to 10, 1 is not at all and 10 is fully understanding)

The mean understanding rating was 5.2

Question

Has EID made you consider giving up sheep farming?

68% of the 283 respondents said they had considered giving up sheep farming because of EID.

Question

If the following changes could be made to the regulation, how useful (on a scale of 1 to 10) would they be?

- 1) Remove the requirement to individually identify and record sheep on their holding of birth
- 2) Replace double tagging of breeding sheep with single tagging

	number of respondents who answered	Mean usefulness rating
Remove the requirement to individually identify and record sheep on their holding of birth	256	9.5
Replace double tagging of breeding sheep with single tagging	251	9.1

39 additional comments suggested sheep should be tagged with individual numbers only when they leave the holding of birth

Question

Have you destocked since the start of 2011?

40 (14%) of respondents have destocked since 2011.

The mean reduction in their stock is 37%.

Reasons given for de-stocking

	% of respondents who ticked
Fear of cross-compliance requirements	86%
Difficulties caused by electronic tagging	80%
Rising input costs	56%
Lack of local infrastructure	8%
Financial/business decision	23%

Any other reasons for de-stocking?

Reason	Number of respondents
Age	3
Health	2
Labour shortage	2
Worsening Weather	1

Comments

148 additional comments were received of these;

- 27 covered increased bureaucracy
- 23 tagging issues
- 20 cross compliance issues and system problems
- 11 de-stocking
- 9 cost
- 6 stress
- 13 other

Tagging issues

- ‘Had to contact the manufacturers to say that even their best tags don’t work in 99% humidity, cold maritime climate – Need to be kept in a deep freeze!!!’
- ‘some bend and are useless’
- ‘EID tags too heavy and cumbersome for native small Shetland lambs’
- ‘This is cruelty to animals when you see torn ears fluttering in the wind’
- - tags ripped out getting hooked on fences. In severe winters ice/snow gathering on tags

Only one positive/neutral comment

- 'we have always recorded our sheep since 1976 so we can cope with the tagging'



Cross-Compliance/system problems

- ‘until a tag which is guaranteed to stay in for the sheep’s life + the readers can read the tags 100% of the time then this is a waste of time.’
- ‘I didn’t have the individual numbers of 5 bought in lambs recorded they have put on a penalty of 3%. This was something I didn’t know had to be done... This penalty will cost us several hundred pounds which I have already said is unfair. Such farms cannot take this extra cost and the worry and stress is almost unbearable’

- I had a sheep inspection last year... and as a result I got a 5% penalty imposed. I found the inspector very unhelpful and I think some of the small mistakes could have been overlooked. It felt like an interrogation, as it left me feeling as if I had committed a crime'
- 'Impossible to record every sheep's tag number and the penalties are too high'
- Almost impossible to keep exact record of sheep on common grazing

De-Stocking

- ‘All the regulations were getting near impossible with hill stock.’
- ‘Fed up with constant changes and mindless regulations’
- ‘with less sheep there is more chance of keeping record correct.’
- ‘hill stock maintained by communal management. Decreased numbers by others distorted the overall balance of management and increased our burden.’

Cost

- ‘It is cost, work and confusion completely out of proportion to any benefit.’
- ‘Tag management takes up as much time as the task of keeping my sheep’s feet in good order without any of the benefits to the welfare and productivity of the flock.’
- ‘EID is a waste of time and money’

Bureaucracy and stress

- ‘Increasing regulation ripping the joy of farming to shreds’
- ‘routine issues like tagging become extensive research problems’
- ‘continual worry that everything is done properly’
- ‘EID has produced a very negative attitude with livestock producers, just adding to the burdens of cost of feed, freight and low returns, pushing many to the edge.’

Summary

- The majority of respondents have experienced problems with the practical application of regulation.
- The respondents give a very low rating to their own understanding of the regulation.
- Two proposed changes to the regulation which would remove the requirement to individually identify sheep on the holding of birth and to remove the requirement to double tag sheep both gained extremely high approval ratings (9.5 and 9.1)
- 14% of the returnees had de-stocked since 2011 (mean reduction in stock 37%) and fear of cross compliance inspections and the difficulties caused by electronic tagging are the most commonly chosen reasons given for this.

Conclusions

- EC 21/2004 remains a serious issue for Shetland sheep producers
- The combination of animal welfare issues, complexity, bureaucracy, cost and cross compliance is negatively affecting producers
- These issues appear worse for farmers using extensive management systems and small native breed sheep
- The de-stocking described is likely to destabilise the Shetland sheep industry if it continues
- These issues are highly likely to occur in other sheep producing areas of Europe

Ideas for Change to 21/2004

- Return to previous flock based identification system
- Review of regulation
- Flexibility for national solutions to traceability

Shetland Compromise Proposal

- **Breeding flock** – single flock tag. Can be electronic or non electronic.
- **Any sheep moving off the holding of birth** – single electronic movement tag
- **Sheep moving onto the holding** – single electronic movement tag can be replaced with own flock tag after a set period determined by Foot and Mouth epidemiology (incubation period F&M 2-21days). Movement tag can be cut out or retained in addition to new flock tag.

- **Movement documents are batch paper documents information can be added to by electronic reads through CCPs.**
- **Farm records are based on batch recording.**



How can we bring European decision making closer to European communities?