



Consultation on the numbering format for Bovine EID

Closing Date for Responses is 16th August 2019

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1. Purpose

The Department of Agriculture, Environment and Rural Affairs (DAERA) is seeking views on its proposed approach to the implementation of the European Union Commission Implementing Regulation (EU) 2017/949 which sets out the configuration of the identification code for bovine animals in Northern Ireland.

How to respond

Please forward your comments on the consultation document to:

Animal Identification and Welfare Branch
Department of Agriculture, Environment and Rural Affairs (NI)
Ballykelly House
111 Ballykelly Road
Limavady
BT49 9HP

Or by e-mail: FarmedAnimals.IRM@daera-ni.gov.uk

Closing date

Responses should be submitted by **16th August 2019**.

A summary of the responses received will be published after the engagement has closed. We will not respond individually to the points you raise nor will we acknowledge receipt of individual responses unless requested.

Additional copies of this consultation paper are available on written request to the address or email above or by telephoning 028 7744 2367. The paper is also available to view at: www.daera-ni.gov.uk

To ensure the most effective use of our and our stakeholders' resources we are undertaking a targeted approach by contacting those stakeholders that may have a particular interest in the issue, or to whom the issue is of particular relevance. A list of stakeholders is attached as an annex to this document.



Confidentiality of Consultation

The Freedom of Information Act 2000 gives the public a right of access to any information held by a public authority, namely the Department in this case. This includes information provided in response to this consultation exercise. The Department cannot automatically consider information supplied to it, in response to this consultation exercise, to be confidential.

However, the Department does have a responsibility to decide whether any information provided by you in response to this consultation exercise, including information about your identity, should be made public or be treated as confidential. If you do not wish information about your identity to be made public please include an explanation in your response.

Please be aware that confidentiality cannot be guaranteed, except in very particular circumstances. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request.

The Department will process your personal data in accordance with the Data Protection Act 2018, should you respond in an individual capacity. This means that your personal information will not be disclosed to third parties should you request confidentiality.

You should be aware that the Department will publish a synopsis of responses to the engagement. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.

For further information about confidentiality of responses please contact the Information Commissioner's Office, or visit: www.informationcommissioner.gov.uk



2. Introduction

In order to maintain and improve Northern Ireland's standing as a region with a robust traceability regime, the Department has been examining the incorporation of Radio Frequency Identification (RFID) or electronic tags for the identification of cattle (EID). With appropriate infrastructure in place, EID can simplify the way all animal events, including movements are recorded for farmers, markets, abattoirs and the Department, generating significant efficiencies throughout the supply chain.

The current procedures for recording cattle movements are functional and fit for purpose, but still rely on restraining and handling animals to visually read tags, as well as significant manual data input, at critical control points throughout the ID, testing, movement and slaughter process. The adoption of bovine EID can deliver faster processes with reduced handling of animals, improving health and safety on farms, at markets and at processing sites and also reduce costs and errors. Many farmers, have had EID in place for a number of years and this has unlocked improvements in management practices.

The Department has been in discussion with the Department for Environment, Food and Rural Affairs (Defra) as well as the Devolved Administrations in the UK about the roll out of bovine EID. All four administrations support the aim of achieving common standards for bovine EID, which includes agreeing the format of the animal identification number to be used for the animal tags and the electronic chip which forms part of the bovine EID.

Current Numbering Regime

The current animal numbering regime in use in Northern Ireland will not support the implementation of bovine EID. In order to successfully implement electronic tagging, the Department will need to implement a "what you see is what you get" animal number which is compliant with the International Committee for Animal Recording (ICAR) standards, International Organisation for Standardisation (ISO) standards and aligns to UK and European requirements.

The European Commission has brought forward an implementing act (Implementing Regulation (EU) 2017/949) which sets out the configuration of the identification code for bovine animals using EID. In particular, this regulation amends Commission Regulation (EC) No 911/2004 to enable bovine EID to utilise the country code 826 for animals in the UK.

The most appropriate configuration of the identification code for bovine animals, to be consistent with the standards set by ISO for the identification of animals, is either the two-letter alpha country code (UK) or the three-digit numeric country code (826) and an individual code for the animal consisting of a maximum 12 digits.

The purpose of this consultation exercise is to set out two options for a new numbering regime for cattle in Northern Ireland and to seek your views on which option you would prefer to be adopted. The document will outline the existing format and the two potential EID numbers, as well as providing information on alternative options which were not deemed viable or operable.



3. Existing format

Traceability is of paramount importance for animal disease control and the protection of public health. It depends on the animal being correctly identified and that identification correctly recorded at all times – on the farm, in the market and at tests, etc.

The EU requirements provide that all cattle keepers must notify the Department of the births, death (including stillbirths) and movement of cattle. Animals must be double tagged and a herd register must be kept to record this information. Details of these requirements are set out in Council Regulation (EC) No. 1760/2000.

Currently the format of the number on a bovine animal tag in Northern Ireland is comprised of the country code, a bovine region identifier, a six digit herd number (which comprises of a two digit area code and four digit individual herd number), a four digit animal number and a check digit.

The inclusion of the check digit is for several reasons.

1. When a herd reaches animal number 9999 plus check digit, the next number reverts to 0001 plus check digit. This check digit is generated using a calculation that enables a different check digit to be used along with a previously used four digit number. This ensures that each animal number is unique in compliance with legislation.
2. The check digit is also used to verify the four digit number of the animal, reducing the occurrence of transcription errors which can lead to traceability issues, movement restrictions and possible exclusion of animals from the food chain.

Existing Number												
Country Code	Bovine Region ID	Herd Number						Animal Number				Check Digit
UK	9	H	H	H	H	H	H	N	N	N	N	C
		1	2	3	4	5	6	1	2	3	4	1

Key: **H** = Herd number **N** = Animal number **C** = Check Digit



4. New EID Format

The implementation of Bovine EID will necessitate a change away from the existing tag number format. The new format must not be greater than 15 digits, set by ISO standards and will be displayed as a number on readers which scan the electronic chip in the tag. The number on the electronic chip must start with the country code of 826.

The remaining 12 numbers after the country code will commence with 2 numbers which will identify Northern Ireland (NI) as a region within the UK. NI has been allocated 19 for this purpose, whilst the remaining 10 numbers will be used to identify the herd and the individual animal number. The requirement for all identification numbers to be unique means that numbers cannot be repeated.

5. Non-Viable EID Numbering Options

The Department explored a number of potential EID numbering solutions, however after careful examination they were considered not practicable. These are outlined below.

Options explored

- **Retaining alpha country code**

Initially the Department considered that if we retained the alpha country code UK as opposed to using the three digit numeric country code, that it would release a digit from the total number of 15, which could be used as a check digit. However under the implementing regulation, the number which follows the country identifier cannot exceed 12 digits. As a result of this there are insufficient characters in order to incorporate a check digit.

- **Removal of DVO Sub-Area from the Herd Number**

The first two digits of existing herd numbers represent a geographical sub-area which in turn is aligned to a Divisional Veterinary Office (DVO).

The Department again considered removing these first two digits from the herd number and replacing it with a single digit number between 0-9 to identify the DVO. Again the purpose of this was to try and retain capacity for a check digit. This numbering format was not feasible as it would lead to duplication of herd numbers as well as a change in herd number for a significant proportion of keepers.

- **Removal of existing Herd Numbers**

The possibility of removing the herd number from the tag number was also investigated. Using this methodology, tags would be allocated as consecutive numbers on a first come first served basis. This would mean that tags allocated would not be



visually linked to a particular herd. This option would result in significant disruption for existing herd keepers and lead to the possibility of mistakes when manually reading the tag, especially as numbers get larger.

- **Physical Check Digit retained on Tag but not recorded on EID device.**

In order to retain a check digit, it was suggested that a check digit would be printed on the ear tag in a different colour or in brackets, in order to differentiate from the official ID. The check digit would not be on the electronic chip. However, Commission regulation 911 of 2004 at article 2 (e) cites that the inscription on a tag cannot exceed 15 digits.

6. Viable EID Options for Northern Ireland

Following consideration of potential options, there is no obvious solution which will enable DAERA to retain the use of the existing numbering regime. All proposed solutions involve altering the current number format to some degree.

There are only two viable options which meet the requirements for a bovine EID identification number:

Option One - Removal of Check Digit

The first viable option uses the two letter country code and the two digit identifier allocated to Northern Ireland, in conjunction with the existing herd number. It also maintains a four digit animal number. However, the check digit is removed from the end of the sequence.

- UK (read electronically as 826) UK Identifier
- 19 NI Identifier
- 123456 6 Digit Herd Number
- 7890 4 Digit animal identifier

15 Digit ISO standard number												
UK Country Code	NI Identifier		Herd Number						Animal Number			
826												
UK	1	9	1	2	3	4	5	6	7	8	9	0



This option will neither alter the existing herd number nor animal number but once herds reach Animal Number 9999, a new Herd Number would need allocated to avoid duplication of animal numbers. For example, for suckler herds with an average of 18 animals this would be potentially 555 years, or a dairy herd with an average 95 cows, this would be 105 years. Currently there are about 1350 farms with more than 100 animals in their herds.

Option Two - Modification of Herd Number

If it is decided that a check digit is necessary, a solution would need to be found, without exceeding the maximum 15 digits permitted. Therefore the only viable way to accommodate a check digit, is to amend the herd number identifier from six digits to five. This will create a new herd number which has no relationship to the existing herd number as it will be a new number in its entirety.

- UK (read electronically as 826) UK identifier
- 19 NI Identifier
- 12345 5 Digit Herd Number
- 7890 4 Digit Animal Identifier
- 1 Check digit

15 Digit ISO standard number												
UK Country Code	NI Identifier		Herd Number					Animal Number				Check Digit
826												
UK	1	9	1	2	3	4	5	7	8	9	0	1

By reducing the existing herd number to five digits (generating a new herd number), a check digit can be retained at the end of the sequence.



7. Questions

Responses to this consultation are sought by 16 August 2019. In responding it may help to focus on the following questions.

Q. Of the two viable options listed above, which is your preference?

Q. Is there another viable option you can think of which we haven't already identified?

8. Next Steps

As an agreed number forms the cornerstone of the database and recording system, completing this phase first would enable the Department to take forward bovine EID with an agreed direction and certainty.

When agreement on a numbering format for bovine EID ear tags that is ISO compliant and is compatible with the numbering format adopted by the UK is complete, it is planned to establish a stakeholder forum comprised of representatives from the relevant cattle industry sectors. This group will be used to test and agree key features of bovine EID policy. For example, tag type, tag colour and whether or not the bovine EID tag should be the primary or secondary identifier.

Following this it will then be necessary to produce specifications to develop the Northern Ireland Food Animal Information System (NIFAIS) to support and utilise bovine EID.

Finally it will be required to agree how bovine EID will be implemented at a farm level, including which animals EID tags should be applied to, and when this should happen.



Annex 1

List of Stakeholders for consultation:

Association of Veterinary Surgeons Practising in Northern Ireland (AVSPNI)	Agri-Food & Biosciences Institute (AFBI)	AI Services (NI) Ltd	Animal Health & Welfare Northern Ireland	Antrim & Newtownabbey Borough Council
Ards & North Down Borough Council	Armagh City, Banbridge & Craigavon Borough Council	Belfast City Council	Causeway Coast & Glens Borough Council	Cogent Breeding Ltd
DAERA Disability Forum	Dairy Council NI	Dale Farm Cooperative Limited	Derry City & Strabane District Council	European Angus Cattle Society
Fermanagh & Omagh District Council	Genus Breeding Ltd	Irish Moiled Cattle Society	Lisburn & Castlereagh City Council	Livestock & Meat Commission for NI
Mid & East Antrim Borough Council	Mid Ulster District Council	National Beef Association	Newry & Mourne District Council	North of Ireland Veterinary Association (NIVA)
NI Aberdeen Angus Society	NI Agricultural Consultant's Association (NIACA)	NI Belgian Blue Club	NI Blonde D'Aquitaine Cattle Club	NI Cattle Traders and Stock Owners Association
NI Charolais Club	NI Ear Tag Suppliers	NI Hereford Breeders Association	NI Holstein Friesian Breeders Club	NI Limousin Cattle Club
NI Meat Exporters Association	NI Rural Development Council	NI Simmental Cattle Club	Rural Community Network	
Northern Ireland Beef Breed Liaison Group	Pedigree Cattle Trust	Piedmontese Society	Rare Breeds Survival Trust (Northern Ireland Support Group)	Rural Community Network
Rural Support	Ulster Ayrshire Cattle Club	United Dairy Farmers	Ulster Jersey Cattle Club	Ulster Farmers Union
Vets NI				

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