

# **Consultation Analysis Proposed Amendment to The Prohibited Procedures on Protected Animals (Exemptions) (Scotland) Regulations 2010**



## **Consultation**

In a consultation issued on 26 July 2016 the Scottish Government proposed that ear tagging of bovine animals should be allowed for the purpose of taking tissue samples for genotyping, as well as for identification and disease control. The consultation document was sent to a comprehensive range of animal health and welfare stakeholders and was uploaded to the Scottish Government Citizen Space portal.

The consultation period ended on 29 August 2016 with a total of 21 responses submitted, including 12 from organisations (such as the National Farmers Union Scotland, Animal Concern and the British Cattle Veterinary Association) and 9 from individuals. Of the total responses 15 were in favour of the proposal with 5 expressing opposition. One respondent did not indicate either agreement or disagreement.

Among those in favour of the proposal some reservations were raised. One respondent was concerned about losing beneficial genetic traits. Animal Concern were in favour of the proposal but raised the welfare implications of unnecessary tags and preferred to see the procedure incorporated into the main ID tag. However they also referred to a recent BBC television documentary on genetic screening and highlighted the potential for this to minimise the number of cows having difficult deliveries due to oversized calves, as well as screening out unsuitable animals for breeding.

There was also a concern raised from the Farm Animal Welfare Committee about multiple tagging, and where possible they would prefer tissue tagging to be carried out and combined with the formal ID tag. In addition they indicated that they would like testing to be limited to one additional tagging operation. The Scottish Association of Meat Wholesalers made a similar point about using main ID tags so as to avoid any confusion between official ID tags and tissue sampling management tags.

There was one additional comment proposing that the amendment should be extended to include other livestock; specifically sheep, goats, pigs and horses.

Comments from respondents in opposition to the amendment were generally concerned with subjecting animals to invasive procedures. There was also a comment suggesting that current procedures were sufficient for collecting tissue samples.

## **Scottish Government Conclusion**

We note and understand the concerns which have been raised relating to animal welfare. However we do not consider, from the evidence available, that there would be a significant adverse impact on animal welfare arising from the proposal to exempt bovine tissue tagging from the prohibitions under the Act. Any adverse impacts would be outweighed by the potential benefits to be gained from genotyping, both in relation to the long term welfare of cattle and for improving the efficiency of cattle production systems, including carbon efficiency. We will ensure that the tags sent to farmers have very detailed guidance on their use. The guidance will remind farmers that incorrectly applied tags, or those applied with an applicator designed for

another tag type, may cause pain and infection and that the correct applicator should be used.

Participants in the scheme are obliged to tissue sample 20% of their calves, which are selected on the information recorded by the farmer. With regard to the suggestion that ID tags be used for the purpose of taking tissue samples, we understand the attraction of such an approach in terms of minimising the number of tags applied to cattle. However, using ID tags would lead to farmers tissue sampling 100% of their calves (whereas under the scheme they are obliged to tissue sample only 20% of their calves.) For various reasons this would present challenges in terms of administration, logistics and cost which could not practicably be resolved at this juncture, although we are open to considering improvements to the scheme over time to see if the approach to tagging could be streamlined in the future.

At this time we do not propose to amend the legislation to include other livestock as our primary aim presently is restricted to bovine animals. Were we to propose to apply the amendment more broadly we would bring forward a separate consultation.



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