

<p><i>Title:</i> <b>Implementation of e-reporting for Pigs in England</b></p> <p><i>Lead department or agency:</i> <b>Defra</b></p> <p><i>Other departments or agencies:</i> <b>Animal Health and VLA</b></p>	Impact Assessment (IA)
	<b>IA No:</b> Defra 1055
	<b>Date:</b> 13/07/2011
	<b>Stage:</b> Final
	<b>Source of intervention:</b> Domestic
	<b>Type of measure:</b> Secondary legislation
	<b>Contact for enquiries:</b> Susan Warner 01270 754055

## Summary: Intervention and Options

### What is the problem under consideration? Why is government intervention necessary?

This impact assessment covers pig movements in England. The current paper method of reporting pig movements is time consuming for all industry sectors. Information is loaded by Local Authorities onto a central database (Animal Movement Licence System - AMLS) and there can be delays of a number of days before it is loaded. In a disease outbreak situation this means that the movement record could be unreliable. An industry led initiative piloted a project on electronic reporting of pig movements. This demonstrated that an automated electronic system could save money and provide a more accurate dataset. A change to legislation covering England is required to support the introduction of electronic reporting at national level. A consultation held in May and June 2011 gained unanimous agreement from respondents for the proposal to introduce electronic reporting of pig movements.

### What are the policy objectives and the intended effects?

To amend the domestic legislation - "The Pigs (Record, Identification and Movement) Orders for England (2007) called PRIMO to allow for the introduction of electronic reporting. The intention is to reduce reporting costs for the industry and government and provide an up to date record of where pigs have moved to and from, to be used in the event of endemic and exotic disease outbreaks.

### What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Three policy options have been considered: (i) Option 1: Do nothing, keep the existing paper method of reporting pig movements, (ii) Option 2: Electronic reporting by 100% of pig keepers, (iii) Option 3: Electronic reporting undertaken by between 70% of pig keepers expected to rise to 85% over a ten year period. Non IT enabled keepers would be able to text or telephone their pig movement details through to the operators of the electronic system. This means that these keepers do not have to purchase any equipment to facilitate electronic reporting and so would not be financially disadvantaged.

Option 3 is the preferred way forward and was favoured by all respondents to the consultation in England as the one which offered the most flexibility for all sectors of the pig industry. This will allow pig movements to be entered online to a central electronic reporting industry system operated by the British Pig Executive called the "BPEX Hub" or by telephoning or writing to a free of charge bureau service.

**Will the policy be reviewed?** It will be reviewed. **If applicable, set review date:** 1/2015

**What is the basis for this review?** PIR. **If applicable, set sunset clause date:** Month/Year

**Are there arrangements in place that will allow a systematic collection of monitoring information for future policy review?** Yes

**SELECT SIGNATORY Sign-off** For consultation stage Impact Assessments:

***I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.***

Signed by the responsible Minister: \_\_\_\_\_ Date: \_\_\_\_\_

# Summary: Analysis and Evidence

# Policy Option 2

## Description:

100% Electronic Reporting

Price Base Year 2011	PV Base Year 2011	Time Period Years 11	Net Benefit (Present Value (PV)) (£m)		
			Low:	High:	Best estimate 1.99

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	1		
High			
Best Estimate		0.45	0.34

### Description and scale of key monetised costs by 'main affected groups'

During transition Government will have to fund both the new electronic system and the existing paper data collection operated by Local Authorities. These costs are approximately £0.10m for the preferred 6 month transition period.

Government will incur the costs of funding BPEX to run and administer the e-reporting system, this cost will equal £0.22m per annum.

In order to report 100% electronically (without use of a 3<sup>rd</sup> party), non- IT enabled keepers would have to purchase a computer and internet access. These costs have been estimated at £0.35m for computers (one-off transition cost) and £0.12m for internet access (ongoing annual running cost).

### Other key non-monetised costs by 'main affected groups'

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	1		
High			
Best Estimate		0.02	0.61

### Description and scale of key monetised benefits by 'main affected groups'

There is an overall reduction in costs of reporting for industry compared with the current paper system, due to time savings and reduction in postage costs. The undiscounted per annum savings equal:

(a) Industry – (i) keepers by £120k (ii) markets by £13k (iii) abattoirs by £63k

Local Authorities will no longer have to collect the paper data:

(b) Local Authorities – reduction in costs to support collection of movement data by £412k.

### Other key non-monetised benefits by 'main affected groups'

Government and Industry: Improved quality of movement data which will enable more effective monitoring and tracking of movements in the event of an endemic or exotic disease outbreak.

### Key assumptions/sensitivities/risks

Discount rate (%)

3.5

Assumptions: (Sources, see table 10):

Number of pig keepers: 39,000, Number of movement documents (pigs): 185,000

Labour rates (per hour): keepers - £10.80, markets - £9.67; abattoirs - £9.48

Computer hardware: £350, Internet connection £120 per annum

Risks:

If electronic recording doesn't work Government will not be able to monitor pig movements effectively and there is the possibility of infraction proceedings by EU if there is incomplete data.

Direct impact on business (Equivalent Annual) £m):			In scope of OIOO?	Measure qualifies as
Costs: 0.12	Benefits: 0.20	Net: 0.08	Yes	Out

## Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?	England				
From what date will the policy be implemented?	01/10/2011				
Which organisation(s) will enforce the policy?	Local Authorities, Rural Payments Agency				
What is the annual change in enforcement cost (£m)?	N/A				
Does enforcement comply with Hampton principles?	Yes				
Does implementation go beyond minimum EU requirements?	No				
What is the CO <sub>2</sub> equivalent change in greenhouse gas emissions? (Million tonnes CO <sub>2</sub> equivalent)	<b>Traded:</b> N/A		<b>Non-traded:</b> N/A		
Does the proposal have an impact on competition?	No				
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?	<b>Costs:</b> N/A		<b>Benefits:</b> N/A		
Distribution of annual cost (%) by organisation size (excl. Transition) (Constant Price)	<b>Micro</b>	<b>&lt; 20</b>	<b>Small</b>	<b>Medium</b>	<b>Large</b>
Are any of these organisations exempt?	No	No	No	No	No

## Specific Impact Tests: Checklist

Set out in the table below where information on any SITs undertaken as part of the analysis of the policy options can be found in the evidence base. For guidance on how to complete each test, double-click on the link for the guidance provided by the relevant department.

Please note this checklist is not intended to list each and every statutory consideration that departments should take into account when deciding which policy option to follow. It is the responsibility of departments to make sure that their duties are complied with.

Does your policy option/proposal have an impact on...?	Impact	Page ref within IA
<b>Statutory equality duties<sup>1</sup></b> <a href="#">Statutory Equality Duties Impact Test guidance</a>	No	18
<b>Economic impacts</b>		
Competition <a href="#">Competition Assessment Impact Test guidance</a>	No	18
Small firms <a href="#">Small Firms Impact Test guidance</a>	No	18
<b>Environmental impacts</b>		
Greenhouse gas assessment <a href="#">Greenhouse Gas Assessment Impact Test guidance</a>	No	20
Wider environmental issues <a href="#">Wider Environmental Issues Impact Test guidance</a>	No	20
<b>Social impacts</b>		
Health and well-being <a href="#">Health and Well-being Impact Test guidance</a>	No	20
Human rights <a href="#">Human Rights Impact Test guidance</a>	No	20
Justice system <a href="#">Justice Impact Test guidance</a>	No	20
Rural proofing <a href="#">Rural Proofing Impact Test guidance</a>	No	20
<b>Sustainable development</b> <a href="#">Sustainable Development Impact Test guidance</a>	No	20

<sup>1</sup> Public bodies including Whitehall departments are required to consider the impact of their policies and measures on race, disability and gender. It is intended to extend this consideration requirement under the Equality Act 2010 to cover age, sexual orientation, religion or belief and gender reassignment from April 2011 (to Great Britain only). The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

# Summary: Analysis and Evidence

# Policy Option 3

Description: 70% electronic reporting rising to 85% over 10 year period

Price Base Year 2011	PV Base Year 2011	Time Period Years 11	Net Benefit (Present Value (PV)) (£m)		
			Low:	High:	Best Estimate: 2.41

COSTS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low		1		
High				
Best Estimate	0.1		0.31	<b>2.84</b>

### Description and scale of key monetised costs by 'main affected groups'

During transition Government will have to fund both the new electronic system and the existing paper data collection operated by Local Authorities. These costs are approximately £0.10m for the preferred 6 month transition period.

Government will incur the costs of funding BPEX to run and administer the e-reporting system, this cost will equal £0.22m per annum and the cost of offering an alternative to e-reporting which equals £0.085m.

### Other key non-monetised costs by 'main affected groups'

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low		1		
High				
Best Estimate	0.02		0.58	<b>5.25</b>

### Description and scale of key monetised benefits by 'main affected groups'

The reduction in costs of electronic reporting for industry compared with the current paper system are lower than Option 2 as electronic reporting is implemented in less than 100% of cases as in Option 2.

a) Industry – (i) keepers by £108k (ii) markets by £12k (iii) abattoirs by £50k

Local Authorities will no longer have to collect the paper data:

b) Local Authorities – reduction in costs to support collection of movement data by £412k.

### Other key non-monetised benefits by 'main affected groups'

Government and Industry: Improved quality of movement data which will enable more effective monitoring and tracking of movements in the event of an endemic or exotic disease outbreak.

### Key assumptions/sensitivities/risks

Discount rate (%) 3.5

Assumptions (Sources, see table 9):

Number of pig keepers: 39,000, Number of movement documents (pigs): 185,000

Labour rates (per hour): keepers - £10.80, markets - £9.67; abattoirs - £9.48

Risks:

If electronic recording doesn't work Government will not be able to monitor pig movements effectively and there is the possibility of infraction proceedings by EU if there is incomplete data.

Direct impact on business (Equivalent Annual) £m):			In scope of OIOO?	Measure qualifies as
Costs:	Benefits: 0.16	Net: 0.16	Yes	Out

## Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?	England				
From what date will the policy be implemented?	01/10/2011				
Which organisation(s) will enforce the policy?	Local Authorities, Rural Payments Agency				
What is the annual change in enforcement cost (£m)?	N/A				
Does enforcement comply with Hampton principles?	Yes				
Does implementation go beyond minimum EU requirements?	No				
What is the CO <sub>2</sub> equivalent change in greenhouse gas emissions? (Million tonnes CO <sub>2</sub> equivalent)	<b>Traded:</b> N/A		<b>Non-traded:</b> N/A		
Does the proposal have an impact on competition?	No				
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?	<b>Costs:</b> N/A		<b>Benefits:</b> N/A		
Distribution of annual cost (%) by organisation size (excl. Transition) (Constant Price)	<b>Micro</b>	<b>&lt; 20</b>	<b>Small</b>	<b>Medium</b>	<b>Large</b>
Are any of these organisations exempt?	No	No	No	No	No

## Specific Impact Tests: Checklist

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<b>Environmental impacts</b>		
Greenhouse gas assessment <a href="#">Greenhouse Gas Assessment Impact Test guidance</a>	No	20
Wider environmental issues <a href="#">Wider Environmental Issues Impact Test guidance</a>	No	20
<b>Social impacts</b>		
Health and well-being <a href="#">Health and Well-being Impact Test guidance</a>	No	20
Human rights <a href="#">Human Rights Impact Test guidance</a>	No	20
Justice system <a href="#">Justice Impact Test guidance</a>	No	20
Rural proofing <a href="#">Rural Proofing Impact Test guidance</a>	No	20
<b>Sustainable development</b> <a href="#">Sustainable Development Impact Test guidance</a>	No	20

<sup>1</sup> Public bodies including Whitehall departments are required to consider the impact of their policies and measures on race, disability and gender. It is intended to extend this consideration requirement under the Equality Act 2010 to cover age, sexual orientation, religion or belief and gender reassignment from April 2011 (to Great Britain only). The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

## Evidence Base (for summary sheets) – Notes

Use this space to set out the relevant references, evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Please fill in **References** section.

### References

Include the links to relevant legislation and publications, such as public impact assessments of earlier stages (e.g. Consultation, Final, Enactment) and those of the matching IN or OUTs measures.

#### No. Legislation or publication

- 1 The Pigs (Records, identification and Movement)(England) Order 2007 (PRIMO)
- 2 The General Licence for the Movement of Pigs
- 3 Council Directive 2008 / 71 on the identification and registration of pigs

### Evidence Base

Ensure that the information in this section provides clear evidence of the information provided in the summary pages of this form (recommended maximum of 30 pages). Complete the **Annual profile of monetised costs and benefits** (transition and recurring) below over the life of the preferred policy (use the spreadsheet attached if the period is longer than 10 years).

The spreadsheet also contains an emission changes table that you will need to fill in if your measure has an impact on greenhouse gas emissions.

#### Annual profile of monetised costs and benefits\* - (£m) constant prices

	Y <sub>0</sub>	Y <sub>1</sub>	Y <sub>2</sub>	Y <sub>3</sub>	Y <sub>4</sub>	Y <sub>5</sub>	Y <sub>6</sub>	Y <sub>7</sub>	Y <sub>8</sub>	Y <sub>9</sub>
<b>Transition costs</b>	0.10									
<b>Annual recurring cost</b>		0.31	0.31	0.31	0.31	0.31	0.31	0.31	0.31	0.31
<b>Total annual costs</b>	0.10	0.31	0.31	0.31	0.31	0.31	0.31	0.31	0.31	0.31
<b>Transition benefits</b>	0.02									
<b>Annual recurring benefits</b>		0.58	0.58	0.58	0.58	0.58	0.58	0.58	0.58	0.58
<b>Total annual benefits</b>	0.02	0.58	0.58	0.58	0.58	0.58	0.58	0.58	0.58	0.58

\* For non-monetised benefits please see summary pages and main evidence base section



Microsoft Office  
Excel Worksheet

## **Evidence Base (for summary sheets)**

### **Problem under consideration**

1. The current method of reporting pig movements is via a paper system in which paper records of movements are sent to local authorities to input the data onto a central Government database. Completing information on movement documents by hand can be time consuming for all sectors of the industry. There can also be a considerable time lag of up to 10 - 15 days before the movement data is received and loaded manually onto the Government's central database "the Animal Movements Licence System" (AMLS).
2. For disease control purposes it is important to have an up to date record of where pigs have been moved to and from. Moving to an electronic system of reporting pig movements that removes the manual data capture from the reporting process will provide more timely and accurate pig movement data to support the control of endemic and exotic disease of pigs.

### **Rationale for intervention**

3. The existing paper based system is burdensome for the majority of keepers as paper movements must be completed for every individual pig movement. Providing an electronic system for reporting pig movements will reduce administrative burdens for the pig industry and provide a more timely and accurate data set.
4. The current system relies on Local Authority ("Local Authority") manual intervention to load data provided by those moving the animals onto the centralised database. The previous ring fenced LA funding for this service has been incorporated in the RSG ("Revenue Support Grant") (on a reducing basis over the next Comprehensive Spending Review). This means the funding is no longer ring-fenced and can be used by Local Authorities for other services. Due to current financial pressures and other priorities, entering data on AMLS may take a back seat. This could result in an out of date data set for pig movements, which in the event of a disease outbreak would severely hamper the Government's ability to manage the outbreak effectively.
5. The consultation to seek views on the proposal to introduce electronic reporting for pig movements in England ended on 15 June. Full agreement was received to introduce electronic reporting which included respondents from the full industry chain (keepers, slaughterhouses, livestock markets and hauliers), trading standards and local authorities and welfare organisations. The proposal was viewed by the industry as a logical progression in the utilisation of accessible technology which would enhance the effectiveness and traceability of pig movements in England. It was noted by respondents that timely and accurate records would be helpful in safeguarding the health and welfare of livestock. It would also be crucial in providing an effective tool in the event of an exotic disease outbreak as more movements could be traced rapidly than in the current paper system.
6. The consultation did not reveal any disagreement or objections to the costs outlined for each option in the consultation IA therefore we have used the figures and assumptions presented there in this Final IA. No correspondent to the consultation disagreed with the rationale that an increase in timeliness and accuracy of movement data would result from the proposal. This would be of great advantage in the early control in the event of a disease outbreak with reduction in the numbers of animals affected which would have clear animal health and welfare benefits.

## Electronic reporting - background

### Current system

7. All pig movements must be accompanied by the movement document (AML2), a copy is at Annex 3. The current paper system uses a movement document which has four different coloured carbonated pages (all with the same information) and is completed as follows:-
  - The person at the departing address completes sections A and C then keeps the yellow copy for their records
  - The person transporting the pigs then completes section B with their details and keeps the blue copy.
  - The person buying the pigs completes section D and must retain the pink copy for least six months. The receiving keeper (farmer, market or abattoir) is responsible for sending the white copy to their local authority (LA) trading standards office within three days of the pigs arriving. The LA records the information from the movement document onto AMLS.

Reporting movements is done on a batch basis – that is the total number of animals moved.

### Proposed new system

8. The proposal to introduce electronic reporting will mean that the function to capture statutory pig movement data from Local Authorities will be transferred to BPEX. All movements will be reported to BPEX or its agents from October 2011 via the BPEX hub which will interface with the Government's AMLS system. BPEX will download data from their hub to AMLS on a daily basis thus ensuring the Government system contains an up to date data set of pig movements. Keepers will be able to report movements electronically via a home computer or by writing or telephoning details of their pig movements to a free of charge bureau service operated on behalf of BPEX by the Meat Livestock Commission. This means that non IT enabled keepers will not need to buy computers following the introduction of electronic reporting. Both electronic and non electronic movements will however need to be notified in advance of the movement taking place, with the exception of movements to markets/collection centres. In this instance the market/collection centre will act as the agent for any "non electronic" movements to markets or collection centre.
9. To offset any potential problems as a result of the move to the new e-reporting system a six month transitional period will be in place to allow non IT enable keepers to adapt to how the new arrangements will operate. During this transitional period keepers can continue to use the existing AML paper system.

### Pig information and numbers - England

10. The introduction of electronic reporting will affect all pig keepers and pig movements. Pigs are moved in batches, the total number of pigs moved are recorded and reported on the movement document. The majority of pig moves are to slaughter and over 70% of keepers farm their pigs indoors in highly controlled environments. It is estimated that indoor pigs account for over 64% of total movements and over 98% of total pigs moved. These keepers will use IT systems as management tools and will find electronic reporting a labour saving initiative for reporting movements. The remaining 30% of pigs are kept outdoors and around 15% of these keepers do not own computers.
11. Details on pig data (England only) used to assess costs for electronic identification and compare them to the current system are in the tables below (information for 2009 is provided as full data for 2010 is not yet available):-



**Table 1: Pig numbers - England**

Keepers and pigs	Numbers (millions)	Data Source
Registered pig keepers	0.02m	Animal health (2009) – 32,272 registered keepers, Defra and BPEX estimate that around 20,000 of which are commercial keepers.
Number of holdings with reported pig moves	0.02m	BCMS (July 09 – June 2010)
Number of pigs	3.87m	December survey of agriculture 2009

**Table 2: Number of batches (movement documents – AML2s completed) – England**

Destination	Number of batches 000s	%	Data Source
Farm to farm	55	26%	BCMS 2009
Slaughterhouse	140	66%	
Market/Collection centre	15	7%	
Other*	1	1%	
Total	211	100%	

For example show grounds, veterinary practices, IA, research, knackers' yards.

### Automation of pig movement reporting

12. Animal Health and the British Pig Executive (BPEX) have been piloting a project on electronic reporting since March 2009. Prior to this project, there has been no previous electronic reporting undertaken for pig movements reporting to a central data base. The project involved working with a number of commercial pig farmers and Local Authorities (who are responsible for inputting movement data onto AMLS on behalf of Defra in England). This project facilitated the transfer of the function to capture statutory pig movement data from Local Authorities to the pig industry, under the auspices of the British Pig Executive (BPEX). It showed that this data capture function can be centralised and delivered more efficiently by the industry. More strategically it was an enabling project that gave an indication of the feasibility of industry provision of the whole movement reporting service for pigs.
13. All sectors of the pig industry have been involved in the project and it is being delivered in partnership with them. The industry sector was represented by the National Pig Association (NPA), British Pig Association (BPA), Association of Independent Meat Suppliers (AIMS) and the British Meat Processors Association (BMPA). The industry is in full support of the withdrawal of the existing paper route. The move from paper to electronic reporting will result in a change to the business process of reporting for non IT enabled keepers (more likely to be small non commercial keepers). These keepers account for 36% of total movements but only 1.5% of the total number of pigs moved. The pig industry including the British Pig Association, which represents the smaller and pedigree pig keeping sectors, fully support the withdrawal of the existing paper movement system.

### Legislative implications

14. EU rules governing the identification and traceability of pigs are implemented in England by "The Pigs (Record, Identification and Movement) (England) Order 2007", usually referred to as "PRIMO". To implement e-reporting PRIMO will need to be amended to provide for an electronic movement reporting system, which may run in parallel with an amended paper based system, for non IT enabled keepers. Because introducing electronic reporting will provide more timely collection of movement data at markets it will be optimal to relax the current provision, under the Disease Control Order, for Movement Licences to be issued for pig movements out of markets by a Local Authority Inspector.

15. Other proposed changes to PRIMO are:-
- Providing for industry to use a compressed air slapmark to identify pigs as an alternative to traditional slapmarking equipment.
  - Bringing in a requirement to oblige individual identification in the use of boars moving to approved EU and domestic artificial insemination (AI) centres.
  - Additionally as a further offsetting simplification measure, the length of time that holding registers need to be maintained will be reduced from six to three years.
16. Agreement was received from the responses to the consultation to proceed with these three changes.

The table below summarises the proposed changes:-

**Table 3: Changes to legislation**

Legislation	Article /Para	Requirement	Proposed change
Primo		Means of identification for pigs	Permit the use of compressed air slapmarks
		Moves to artificial insemination centres	Amend additional requirements for movements of pigs to include individual identification mark for moves to artificial insemination centres
	5 (3)	Retain holding register for six years	Reduce retention period to three years
	12		1) Provide for voluntary use of electronic reporting 2) Movement notification can be made electronically or by phone or in writing. 3) Only copies of movement documents for movements which are not reported electronically must be retained for 6 months.
General Licence for the Movement of Pigs			Administrative amendments to support changes to PRIMO – removal of individual movement licence for moves from a market/collection/assembly centre, AML2 replaced by haulier summary and exemption to retain a paper document for those doing an electronic report.

17. EU legislation (Council Directive 2008/71 and Directive 2000/15) requires the reporting of all pig movements to a central database. There are no changes required to the EU legislation as there is flexibility within it to provide for electronic reporting which is supported by the pig industry.

### **Comparing paper and electronic reporting of pig movements**

18. The current system uses three documents. The introduction of electronic reporting covers the movement document (AML2) and related actions but not the holding movement record. The three documents are:-
- a. The holding register
  - b. The movement document (a copy is in Annex 3) - called AML2 (animal movements licence 2)
  - c. Individual movement licence – moves off markets
19. Recording and reporting of pigs is done on a batch basis; that is the total number of animals moved. Currently, movements are not pre-notified to the central AMLS system. This is updated after the event takes place.

20. The main change in terms of documentation is to replace the AML 2 movement document with a one page haulier summary (movement document). It continues to be necessary for all livestock (cattle, sheep and pigs) to be accompanied by a paper document containing movement details of the animal during transport. The haulier summary (HS) is a one page document which contains the same information as the AML2 movement. IT enabled keepers can print this document from their computer and under the preferred option non IT enabled keepers will be sent a copy by post or fax (with printed movement details) for moves to other farms or abattoirs. They will be given the flexibility to handwrite the haulier summary if the move is to a market or collection centre (blank copies of the haulier summary will be available at markets). This option will allow any keeper not using the electronic system to move their pigs to market without delay to obtain what they believe will be the best price for their animals on any particular market day.
21. The following table provides a brief overview of the differences between the current and electronic system.

**Table 4: Difference between current paper and electronic reporting systems**

Action/ Document	Current system	Electronic Reporting System	
		Electronic	Non-Electronic
Holding register	Updated within 36 hours of move taking place. Retained for <b>six</b> years after keeper has stopped owning pigs.	No change  Retained for <b>three</b> years after keeper has stopped owning pigs.	
Movement document (AML 2)	4 different coloured carbonated pages *Despatching keeper fills in sections A & C and retains the yellow copy *Person transporting the pigs completes section B and retains the blue copy. *Receiving keeper (farmer, market, slaughterhouse) completes section D, retains the pink copy and sends the white copy to their local authority.  <i>Moves are <b>not</b> pre-notified</i>	Not required – movements off and on farms, markets and abattoirs reported electronically via the BPEX hub  <i>Moves are pre-notified</i>	Not required – Keeper uses telephone/fax/post to notify details of move – these are inputted onto the electronic system  <i>Moves are pre-notified</i>
Haulier summary document	Same as the blue copy of AML 2	Haulier summary printed by despatching keeper (farmer or market)	Haulier summary (two copies, one for the haulier and one for the receiving keeper) posted or faxed to the despatching keeper by MLC.
Individual movement licence	Issued and signed by LA Trading Standard Officer for moves off markets.	Not required, markets will record and report moves electronically as soon the pigs move off the market to the new destination.	
Moves recorded on central database	Details of moves (after the event) entered manually by local authorities on the Animal Movement Licensing System (AMLS) following receipt of the white copy of the movement document (AML2)	Moves recorded electronically (in real time/ before the move takes place) on the BPEX hub. An electronic interface will update AMLS (the Government database) on a daily basis. Receiving keeper will continue to notify receipt of moves within 3 days of receipt either electronically or via MLC.	

#### Timescale

22. Domestic legislation needs to be amended at the earliest opportunity to permit electronic reporting. The proposal is to implement e-reporting from October 2011.

23. The question of whether to proceed with a six or twelve month transition period was posed in the consultation. Taking on board the balance of all opinions, the six month period was recommended. This would maximise benefits and cost savings and provide sufficient time to communicate details of the new system to the industry.

## Descriptions of options considered

24. Three options have been considered. These cover full electronic reporting, retaining the current system and partial electronic reporting (where some keepers' telephone or fax details of movements to the BPEX hub).
25. The consultation IA considered two scenarios for the proportion of keepers using the full electronic system who do not wish to report movements via the MLC bureau service. One scenario assumed that 70% of keepers would use the electronic system whereas the other assumed a higher level of uptake at 85%. On the basis of the positivity of consultation responses and estimates of the number of smaller keepers who keep their pigs indoors, it has been assumed for the Final IA that initial uptake will be 70% and will rise in equal increments to 85% by 2022. We have extended the appraisal period to 2022 to reflect this change. These options are summarised in the following table:-

**Table 5: Options and benefits**

Option	Description	Implications
<b>Option 1</b>	Current system, do nothing, retain paper reporting	No change to business processes for industry, status quo maintained.
<b>Option 2</b>	100% of movement documents completed electronically by keeper	This option ensures that:- <ul style="list-style-type: none"> <li>• Movement data captured more quickly and in real time.</li> <li>• Validation at time of reporting will improve accuracy of data submitted.</li> <li>• Both Government and industry will achieve a much more reliable register of pig keepers.</li> <li>• More timely and accurate data supports the control of both endemic and exotic diseases of pigs in the event of a disease outbreak.</li> <li>• The costs of capturing statutory movement data will be reduced.</li> <li>• Transferring data capture function to a central industry point mitigates the potential risks with regard to out of date/incomplete data on AMLS.</li> <li>• Reduces the risk of EU challenge for non compliance with requirement for CA to maintain to database of pig movements.</li> </ul>
<b>Option 3 Preferred</b>	70% of movement documents completed electronically by keepers. Expected to increase to 85% over a ten year period from 2012	As option 2 but 30% of movement documents (15% by 2022) will be telephoned or posted/faxed to the BPEX hub.

Note: The term industry covers, pig keepers, markets and abattoirs.

## Costs and Benefits of options

26. Option 1 is the baseline against which the impacts of the other options are appraised. It therefore has no associated costs and benefits.
27. It is the number of movement documents or batches produced and how many times the movement needs to be reported which is the main factor in assessing costs and benefits. This means that the number of pigs actually moved does not come into the calculations as a movement document could list 1 or 500 or more pigs. The three options have only

considered costs for the moves between farms, markets/collection centres and slaughterhouses as these account for 99% of the movement documents or batches completed.

### Transition costs and benefits

28. It is proposed that there will be a period of transition between introducing e-reporting and the abolition of the old paper based system. This is to allow the keepers time to adjust to the new method of reporting.
29. It is estimated that during the six month transitional period, 55% of movement documents will be completed under the paper system, 10% of movement documents will go via the BPEX bureau service and 35% will be completed electronically. Input of the paper movement document (AML2) will be undertaken by MLC instead of LAs who will no longer be undertaking this function. Under Option 2 (100% e-reporting) non-IT enabled keepers will also incur the additional transition cost of purchasing a computer. The costs of the six month transition period are given in the table below for the preferred Option 3.

**Table 6: Transition costs over 6 months (preferred Option 3)  
October 2011 to March 2012 compared to the current system (option 1)**

	Total Costs Current system over 6 months	Total Costs Transition over 6 months	Transition Costs 6 months <u>Relative to Current</u> System
<i>Total Industry costs</i>	£134,693	£115,220	-£19,473
<i>Total Government costs</i>	£206,141	£302,000	£95,860
Total Industry and Government Costs	£340,834	£417,220	£76,386

*\*This cost is only for the transitional period, once this has ended AML2s will be withdrawn and so manual input will no longer be required for recording movements onto the database*

30. The Government's transition costs are generated by the requirement to operate both a paper and an electronic system in parallel. The industry benefits from a fall in running costs as some people will be reporting using a more time effective e-reporting system rather than the paper system used in the baseline. The costs to Government of operating two systems outweigh the benefits to industry of limited use of electronic reporting during the transition period.

### **Annual Costs and Benefits for the three options**

31. The options appraised here implement a more efficient method of reporting pig movements; the benefits therefore outweigh the costs. For simplicity rather than record in the summary sheets the industry costs and benefits described below separately, the overall benefit has been presented. This is with the exception of the internet costs in Option 2 as these don't apply to all pig keepers.

### **Industry costs and benefits**

32. The benefits of introducing an e-reporting system mainly consist of the reduction in time taken to report movements electronically relative to on paper. It is estimated that generating one electronic record takes 1 minute compared with 4.04 minutes using the current paper system. The time savings accrue to the industry which consists of keepers, markets and abattoirs. Most pig movements involve keepers. They therefore receive the greatest associated benefit. The industry also benefits from reduced postage costs as those who implement e-reporting no longer have to post their form to their Local Authority. However, it does incur extra printing costs.

33. The total cost of producing movement documents and reporting the move for each option is in the tables below.

**Table 7: Total average annual costs by option (excludes transition period)**

Options (£000)	Overall costs - Industry			Industry Costs	Gov. Costs	Total Costs	Net benefits Options 2 & 3 compared to current system
	Keepers	Markets	Abattoirs				
Option 1 Current system	168	19	83	269	412	682	
Option 2 100% electronic reporting	167	6	20	193	220	413	269
Option 3 70% electronic reporting	64	7	38	109	305	414	268

34. The industry costs in the previous table are an average for each year in a 10 year period. The costs to industry of the preferred option 3 in each year with an incremental increase of take-up of electronic reporting from 70% to 85% are outlined in the table below alongside Government costs.

**Table 8: Option 3 – 70% to 85% electronic reporting over 10 years.**

Years	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
% of moves electronically reported	70%	71.50%	73%	74.50%	76%	77.50%	79%	80.50%	82%	83.50%	85%
Industry costs: electronic reporting	£52,084	£53,145	£54,205	£55,266	£56,326	£57,387	£58,447	£59,508	£60,568	£61,629	£62,689
Industry costs: bureau service	£57,058	£54,206	£51,353	£48,500	£45,647	£42,794	£39,941	£37,088	£34,235	£31,382	£28,529
Total Industry Costs	£109,143	£107,350	£105,558	£103,765	£101,973	£100,181	£98,388	£96,596	£94,803	£93,011	£91,219
Total Government costs	£305,000	£305,000	£305,000	£305,000	£305,000	£305,000	£305,000	£305,000	£305,000	£305,000	£305,000
Total Industry and Government Costs	£414,143	£412,350	£410,558	£408,765	£406,973	£405,181	£403,388	£401,596	£399,803	£398,011	£396,219

35. The table 9, below derives the annual undiscounted cost saving (benefit) from moving from the current paper based system to the electronic reporting options by comparing the cost of the current system against the cost of Options 2 and 3. This also provides a breakdown of the main activities for both industry and Government against options 2 and 3:

**Table 9: Comparison of benefits for each electronic option against the current system**

Total Costs per annum ('000)	Option 2	Option 3	
	100% moves reported electronically	2012 uptake - 70% of moves reported electronically	2022 uptake – 85% of moves reported electronically
<b>Industry</b>			
<b>Current System Costs</b>			
Movement document (AML 2) Paper reporting	251	251	251
Movement document (AML 2) Postage costs	18	18	18
<b>Total</b>	<b>269</b>	<b>269</b>	<b>269</b>
<b>New System Costs</b>			
Movement document Electronic reporting	62	44	53
Movement document Text/ telephone call for reporting moves	0	51	26
Movement document (haulier summary) To market for semi electronic reporting	0	6	3
Print costs Haulier summary	11	8	9
Internet service	120		
<b>Total</b>	<b>193</b>	<b>109</b>	<b>91</b>
<b>Industry: Total benefit</b>	<b>76</b>	<b>160</b>	<b>178</b>
<b>Government/Local Authorities</b>			
<b>Current System Costs</b>			
Movement document (AML 2) printing	16	16	16
Movement document (AML2) postage	5	5	5
Local Authority Funding to record movements	391	391	391
<b>Total</b>	<b>412</b>	<b>412</b>	<b>412</b>
<b>New System Costs</b>			
Funding - input data to central system	220	220	220
Funding for BPEX bureau service		85	85
<b>Total</b>	<b>220</b>	<b>305</b>	<b>305</b>
<b>Government: Total benefit</b>	<b>192</b>	<b>107</b>	<b>107</b>
<b>Total Net Benefit</b>	<b>269</b>	<b>268</b>	<b>285</b>

Note: Numbers in table may not add due to rounding

36. Under a full electronic system (Option 2) BPEX will require central Government funding of £220k to maintain and administer the system. Option 3 will allow industry to also record their movements by telephoning, writing or faxing a message to BPEX. Implementing this additional system will cost an extra £85k and will be funded by Government. The total cost to Government therefore in Option 3 is £305k per annum. This is compared to a current cost for the paper based system incurred by the Local Authorities of £412k per annum.
37. The paper based scheme, up until 1 April 2011, was funded by a ring-fenced grant to Local Authorities. In the recent Spending Revenue (SR) a proportion of this money was incorporated within the non-ring fenced Revenue Support Grant (RSG) and a proportion was retained by Defra to fund e-reporting of pig and sheep movements. If Option 1 is

adopted Local Authorities will continue to fund reporting costs from the RSG. Under the alternative Options the Government will fund BPEX and MLC to record the movement data and Local Authorities will not incur any reporting costs. Options 2 and 3 therefore constitute a saving for the Local Authorities in the order of £412k but generate a cost to Government of £220k under Option 2 and £305k under Option 3.

### Unquantified Benefits

38. There are further benefits to this policy proposal that it has not been possible to quantify. As was recognised by consultation respondents increased timeliness of movements data would reduce the risk of animal disease spread. The proposed legislative changes incorporate allowing compressed air slapmarking to be used by industry. This is a higher welfare method of identifying pigs than the traditional alternative and therefore generates a welfare benefit. Further, the proposed legislation is also reducing the retention period of the holding register from 6 years to 3 years, effectively reducing the administrative burden for industry. Not issuing a paper licence is likely to benefit market customers by reducing the delays in queuing for a licence to be issued.

## Risks and assumptions

### Assumptions

39. The key assumptions used to calculate costs are in the table below:-

**Table 10 - Assumptions**

Description	Unit Figure	Source
Labour rates (per hour) <ul style="list-style-type: none"> <li>For farmers</li> <li>For markets</li> <li>For abattoirs</li> </ul>	£10.80 £ 9.67 £ 9.48	Farm rate – based on farm manager hourly rate of £12.36 (2005) and skilled Agricultural Trade hourly rate of £9.07 (2005) uplifted with annual CPI over period 2005-2009. Estimated rate produced by combining the two 2005 occupational rates, weighted 20% farm manager, 80% skilled agricultural trade. (2005 hourly rates from BIS standard cost model (SCM)) Markets and abattoirs from SCM (2005) codes 5119 and 8111, include 30% overhead plus 12% to take into account increase in earnings from 2005.
Livestock holdings (with pig moves)	21,736	BCMS July 2009 – June 2010
Time to <b>manually</b> complete the movement document for farms, markets and abattoirs (mins:secs) <ul style="list-style-type: none"> <li>Farms</li> <li>Markets</li> <li>Abattoirs</li> </ul>	4:04 1:00 1:00	Data from AML2/FCI Trial Final Report – Sample of AML2 completion times.
Time to electronically complete the movement document (mins:secs) <ul style="list-style-type: none"> <li>Farms</li> <li>Markets</li> <li>Abattoirs</li> </ul>	1.00 1.00 1.00	Data from AML2/FCI Trial Final Report – Sample of AML2 completion times.
Computer purchase cost	£350	An average taken from figures supplies by two manufacturers who supply over 80% of the market in England (Nov 2010)
Cost of posting AML2 forms for: Farms Markets Abattoirs	£1,000 £300 £2,700	Based on discussions with LAs
Cost of printing of AML2 form (when electronic reporting is used) to accompany transport of pigs.	£0.06 per form	Paper £1.69/lnk £30 per 500 prints
% of farmers needing to buy i) a computer & ii) internet connection under option 2.	5%	Assumption that 5% of pig keepers do not own/have access to a computer and have internet connection to enable electronic reporting.



40. There are 2 main drivers behind the overall benefit to the options considered here: the extent of e-reporting and whether non-IT keepers need to buy an internet connection. Option 2 may have 100% take-up of e-reporting which lowers costs however, it necessitates non-IT keepers to purchase an internet connection. Option 3 allows for non-IT reporting with the overall net benefit increasing over a ten period as up-take of e-reporting increases. It is assumed that there are always likely to be a number of keepers who do not wish to use an electronic system directly and would prefer to continue to use the bureau service to report movements, hence maximum e-reporting take-up is assumed to be 85%.
41. We have not accounted for the impact on imports and exports of e-reporting as there are very few live pig imports and exports. Live exports only account for 1.3% of the total pig export market. Any training costs to use the electronic reporting system are accounted for in the Government funding package to support the electronic system. No assessment has been made on the impact of the respective options on inspections and standstill arrangements because the requirement to inspect identification, movement records and standstills does not alter. There could be some time saved by inspectors when they check electronic records instead of paper ones but this is only a presumption and difficult to quantify.

### **Risks**

42. Getting BPEX/MLC set up to manage pig movement data quickly is vital if we are to have a functioning pig movement database. Failure to move forward with an electronic system now and adopting Option 1 would increase the pressure on LA resource for manual data input. LAs are unlikely to be able to maintain the existing resource allocated to data inputting because of the RSG budgetary cuts and a database with incomplete data leaves us open to infraction proceedings by the EU and the inability to trace pig movements effectively in the event of a disease outbreak. The move to e-reporting will improve data quality and heighten our ability to trace animals in the event of a disease outbreak. This was recognised by stakeholders in the consultation as the main reason why there was support for the proposals.
43. The introduction of electronic reporting (either directly via a computer or through a bureau service) will not generate any additional risks of non-compliance. There is always a very small number of keepers who do not comply (whatever system is used) and there is no reason to suppose this would increase with introduction of electronic reporting. Trading standards and local authorities noted that that it would be important in their continued enforcement role to access data held on the BPEX hub as well as movement details uploaded onto AMLS. This will be provided and LAs will have access to the BPEX system with regards to movements taking place within the designated authority. LAs will be able to contact the dedicated BPEX and the bureau helpline for any assistance with movement records. BPEX will also offer the required help on enforcement issues resulting from non-compliance e.g. providing witness statements if called upon.
44. The risk of system failure is mitigated by having a fall back server to which the system could be switched in the event of any major outage. In addition a detailed Service Level Agreement (SLA) has been signed up to with the server provider with regards resolution times and potential penalties resulting from downtime. The provider is a major international player with a proven delivery history in this area, therefore the risk of major extended problems are deemed minimal. There is contingency to revert to paper based system which would be handled via the MLC bureau.

## **Administrative burden and policy savings calculations**

45. The overall administrative burden will be reduced for industry by the change from paper to electronic reporting of pig movements and the savings are recorded in the preceding analysis. Likewise Government will save money as the administration of an electronic system is less costly than the existing paper system.

## **Wider impacts**

### *Issues of Equity and fairness*

46. If implemented Option 2 involves 100% e-recording even if the keeper does not have the required equipment. This would place an additional burden on these keepers to purchase the equipment, a burden which keepers who already have the equipment will not face. Option 2 however, is not the preferred option and the preferred Option 3 allows keepers to record their movements without the use of a computer therefore placing no new discriminatory financial burden on keepers.
47. No other wider impacts are foreseen.

## **Specific Impact Tests**

48. There were no concerns expressed in responses to the consultation on specific impact tests.

### *Competition assessment*

49. Reporting pig movements is a legal obligation which all pig keepers must undertake. The proposal to move from electronic to paper reporting is a change in the method and will not affect the structure of the industry. The proposal does not affect competition, particularly as provision has been made in the preferred Option 3 that non-IT enabled keepers do not need to buy computers (so no additional cost to the industry).

### *Small firms impact test*

50. The intention to introduce electronic reporting still means keepers, markets and abattoirs have to produce movement documents and report the movements so they can be recorded on a central database. It is the method not the requirement to report movements that will change. The impact will be the same for all individual holdings, markets and abattoirs and will provide overall savings.
51. The electronic system will require formal pre-notification, whether the movements are reported on line or through the bureau service by telephone or letter. It is recognised that a number of keepers with small holdings and owning a few pigs may not have computers and so will need to use the bureau service. The majority of pig movements (to slaughterhouses and farm to farm) already require pre-arrangement with the destination premise. Pre-notification under the new system will therefore be in line with current business practices so businesses will not incur any additional costs and will offer the opportunity of providing more robust data by recording both the off and on moves. In turn, this will give more accurate data for tracing pigs and which would be essential for early control of a disease outbreak and be of benefit to both small and large producers.

## Summary and preferred option

52. There is a strong case to implement an e-reporting system, it is supported by industry and is less costly than the existing paper reporting system. There are concerns however that a full 100% e-reporting system will disadvantage those pig keepers who are not IT literate and do not have the required equipment to report electronically. The preferred option is therefore Option 3 as it allows keepers to record their pig movements non-electronically using a phone or a fax machine.
53. The response to the consultation offered overwhelming support for the introduction of electronic reporting. Comments and queries pre-dominantly focused on the detailed process and we will discuss these with the individual organisations so they can be assured their views have been taken on board. The electronic system with the bureau service to support non IT enabled keepers was seen as offering a modern and flexible solution to improving data collection and accuracy of information. This would benefit both the industry and government as a crucial factor in helping in the early control of any animal disease outbreaks. It was for this reason, rather than cost savings, that electronic reporting generated such support. The pig industry views the adoption of technology and a partnership approach with government as the way forward to improve the reporting of pig movements throughout England.

# Annexes

## Annex 1: Post Implementation Review (PIR) Plan

### **Basis of the review:**

Provision has been made for a review of the legislation for electronic reporting under the statutory instrument, The Pigs (Record, Identification and Movement) Orders for England (2011) called PRIMO. This is under article 24 specifying that within five years of the Order coming into force (October 2011) there will be a review of articles 3 to 23 which cover all identification and movement requirements.

### **Review objective:**

This will be to assess the uptake and success of the electronic reporting system. Additionally, we will look to see if there are other de-regulatory measures which can be introduced.

### **Review approach and rationale:**

The review will be conducted in partnership with the pig industry and electronic service providers. The objective will be to consider whether moving to 100% electronic reporting would be beneficial for both industry and government and the impact on costs and benefits for both sectors.

### **Baseline:**

The electronic reporting system with the provision of a bureau service put in place from October 2011.

### **Success criteria:**

The level of electronic reporting will determine the success of the new approach to reporting pig movements.

### **Monitoring information arrangements:**

The electronic system will be managed by the industry through the British Pig Executive (BPEX) and will be responsible for monitoring and providing information as required by Government.

### **Reasons for not planning a review:**

Not applicable

## **Annex 2: Outcome of Impact Tests not referred to in the Evidence Base**

### Legal Aid

The proposal to introduce electronic reporting does not create any new criminal sanctions or civil penalties.

### Sustainable Development

The move from paper to electronic reporting of pig movements is in accordance with the shared UK principles of sustainable development.

### Carbon Impact Assessment

Electronic reporting will have no significant effect on carbon emissions and may reduce the carbon footprint as the quadruple four page paper movement document will no longer be required.

### Other Environmental Issues

There is no change to the requirement to report pig movements, only the method will change. Therefore the proposal has few implications in climate change, landscapes, water and floods, habitat and wildlife or noise pollution. There could be savings in relation to waste as fewer paper documents will need to be produced and eventually sent for re-cycling.

### Health Impact Assessment

Electronic reporting will not directly impact on health and well being and will not result in health inequalities.

### Race/Disability/Gender

There are no limitations on meeting the change from paper to electronic reporting on the grounds of race, disability or gender. The proposal does not impose any restriction or involve any requirement that a person of a particular racial background, disability or gender would find difficult to comply with. Conditions apply equally to all individuals and businesses involved in the activities.

### Human Rights

The proposal is consistent with the Human Rights Act 1998.

### Rural Proofing

The majority of producers are based in rural areas and the proposal is a change in method of reporting pig movements only and will not have a negative effect on the rural community.

**Pig Movement Document - AML2**

**Report of a Pig Movement made under the General Licence for the Movement of Pigs under the Disease Control (England) Order 2003**



Please complete using BALL POINT pen and press firmly but before doing so read the important notes overleaf.

**Section A – Identification and traceability. (Please also complete Section C below.)**

**1. Departure details**

Departure CPH/Other ref.

Assured Scheme No.

Move within a Pig Pyramid  (Tick if appropriate)

Holding of birth CPH/Other ref. (to be completed only if pigs are moving on a temporary mark)

Keeper's name and full postal address of holding of **Departure**

Name and full postal address of **Owner (if different)**

Postcode

Postcode

**Details of pigs**

Number of animals	Description (e.g. boars, sows)	Lot Number	Identification mark
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Total number of animals** If necessary attach a continuation sheet (AML 2A) and tick this box

I declare the above details are correct and the animals are being moved in accordance with the provisions laid down in the licence.

Signature

Date

Name in BLOCK letters

Tel. No. (incl. national dialling code)

Completion by Keeper at Departure Holding

**Section B – Transporter details**

Name, full postal address and Assured Scheme number

Postcode

Assured Scheme number

Vehicle registration(s)/trailer ID

Date and place vehicle last cleansed

Transporter's Permit no. (where applicable)

Expected Duration of Intended Journey

Completion by Transporter

**Loading**

**Departure**

**Unloading**

Date:

Date:

Date:

Start time:

Time:

Finish time:

**Time and place where rest stops undertaken including if the animals were watered and/or fed (if over 8 hours)**

Tel. No. (incl. nat. dialling code)

Transporter's Signature

Name in BLOCK letters

**Section C – Destination details(1)**

Name and full postal address

Postcode

State type of Market or Collecting centre, where appropriate

• Dedicated slaughter  • Other

Completion by Keeper at Departure Holding

**Section D – Destination details(2)**

CPH/Other Ref.

Were pigs received in good condition? Yes  No

Were any pigs showing signs of distress? Yes  No

Were the farm groups separate on the vehicle? Yes  No

Number received  Number DOA

I declare the details in this section are correct.

Signature

Name in BLOCK letters

Date

Tel. No. (incl. nat. dialling code)

Completion by Destination