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Dear Sarah

### **Sheep Ear Tagging and EID**

The potential welfare implications of ear tagging of sheep were raised with the Farm Animal Welfare Council by the National Sheep Association at its Open Meeting last year. Farmers might be more aware of the issue because of the recent (2010) requirement for Electronic Identification (EID).

#### **Legislation**

Since July 2005 and for reasons of traceability and disease control, EC Regulation 21/2004 has required double tagging of sheep not intended for slaughter within 12 months of age. The UK applied a derogation to the requirement to double tag until 11 January 2008, identifying with a single tag.

Since 31 December 2009, the Regulation has required that one of the identifiers for breeding sheep (i.e. any not intended for slaughter within 12 months of age) is electronic. Member states can apply a derogation for lambs intended for slaughter, requiring only a single tag identified by holding-of-birth flock mark.

Since then, different parts of the UK have implemented the derogation for slaughter animals in different ways: in England and Wales, a single conventional (non-EID) or a single EID batch tag for lambs intended for slaughter is permitted whilst Scotland requires an EID batch tag to be used. There is no slaughter derogation in Northern Ireland. There is no exemption for animals kept beyond 12 months of age.

The Regulation requires the recording of individual identities (all sheep individually electronically identified on or after 31 December 2009) and batch identities (slaughter lambs) in the holding register.

Sheep must be identified before 9 months of age (6 months for intensive systems of production), or before they leave the holding-of-birth, whichever is sooner.

Tags that are lost or damaged must be replaced within 28 days of discovery of loss or damage. When it becomes necessary, tags may be removed to prevent unnecessary pain, but they must be replaced once any infection or injury has healed.

#### Definition of the problem

Ear tagging is a permitted mutilation in sheep. There will be some distress associated with catching and handling a sheep for ear-tagging but this is transient and likely to be of minimal consequence to the sheep's welfare. There is immediate pain when a sheep is tagged but long-term pain is unlikely unless the tagging site is damaged or becomes infected. Tearing of the ear when a tag is pulled out constitutes poor welfare, e.g. when a sheep catches its head in a fence or hedge. The likelihood of an ear tag being lost increases when: i) a tag is used that is inappropriate for the sheep's age/size/breed; ii) when a tag is positioned incorrectly; iii) a tag (or its applicator) is faulty; or iv) when there are flies in the environment. However, as mentioned above sheep can remain on the holding for up to 9 months before being tagged.

#### What surveillance is undertaken to monitor the extent of tagging problems?

Reports of tag problems are made to RPA/BCMS via their website. Sheep tagging is part of the cross-compliance inspection. Inspectors have reported occasional ear damage related to tag losses, which have been thought to be due to the use of inappropriate tags, incorrect positioning or without consideration of ear growth.

#### How widespread is the problem of tagging problems in sheep?

The extent of the problem is not clear. There have been anecdotal reports of tagging problems from the sheep sector (and photographs of cases are dramatic) but the reported incidence is low. Most of the national flock is now tagged and complaints to the RPA are low: 2007 – 15 reports; 2008 – 12 reports; 2009 – 9 reports. In 2010, the industry encouraged sheep keepers to report welfare problems related to ear tags and complaints rose to 51, with 16 received from January to June 2011. Defra considers these numbers small in comparison with the numbers of tags ordered (in 2010 over 19 million tags were supplied for sheep). However, this may reflect farmers' unwillingness to report problems rather than what is truly happening.

#### Has the requirement for double-tagging made the problem worse?

There is no evidence that double tagging since 2008 has made the problem worse; however, there is clearly a higher risk since each sheep has two tags rather than one.

## How much suffering is caused by tagging problems?

There is no definitive evidence on this, but whilst the potential for suffering throughout the UK flock is large, it appears that most sheep are tagged without a welfare problem.

## Guidelines for appropriate tagging

The rules for tagging sheep are complex but farmers need to understand them. They should plan when sheep need to be tagged and should schedule this to avoid tagging lambs once flies have emerged.

To tag sheep correctly requires knowledge and skill. Guidance is available from Defra (and the Devolved Administrations in Wales and Scotland) that sets out how to reduce the number of lost tags and how to avoid welfare problems. It stresses the need to use the appropriate type of tag for the breed, size and age of sheep. Tag manufacturers also include their own advice on tag application with their orders.

## Conclusion

The evidence shows that ear-tagging of sheep is unlikely to lead to poor welfare provided that the guidelines for good practice are followed. FAWC would like public surveillance to continue so that the risks of ear tagging to a sheep's welfare are kept under review.

Yours sincerely

*Huw Davies*

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