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**Rural Payments and
Inspections Directorate**

Sheep and Goat Identification Inspections (SGII)

2011

Guidance for Inspecting Officers

Revisions:

Date	Section	Reason for Change
05/08/2011	2.4.2 Page 24 2.6.2.2 Page 26 5.3.6 page 43 5.3.7 page 44 9.5.1 page 59	Decision reached that where a keeper elects to use CCP information as part of the movement record and this is incomplete, that can be seen to satisfy requirements for 'off' moves in 2011, as well as all movements in 2010.
30/9/2011	Objective Reference list page 4	Addition of pre-inspection checklist reference & Animal Health Holdings spreadsheet. Addition of objective reference for 2011 data capture guidance & correction of reference for bio-control manual
30/9/2011	Section 2 page 9. Section 3.2 Page 39	Use of spreadsheet showing SAM registration as part of pre inspection verification of registration.
30/9/2011	Section 5.1 page 17. Section 7.7 page 53	Clarify that where electronic tags are found not to be working at inspection, replacements should be fitted and recorded as a result of inspection.
30/9/2011	2.1 page 10, 2.5.3 page 13, 4.2.1 page 32, 5.3.1 page 42, 5.3.9 page 45, 5.4.2.1 page 46, Annex 4 page 67	Clarify that information held on a central computer database (ScotEID, SAMU, AMLS (Annual Inventory)) can be used as part of a keepers' record at their discretion.

21/11/2011	Objective reference list, page 4	Correction of reference for inspection data capture guidance
	1.4.3, page 23	Correction to import/export codes

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Objective Reference List for Sheep Inspection Documents

	Objective ID
Inspection Preparation	
Inspection list 2011	SIACS query general inspections screen
Pre-Inspection checklist	E1307062
Manual selection – computer desk instruction	E1095076
Inspection guidance	E129406
Request an inspection pack	E311012
Animal Health Registered Holdings spreadsheet	E1307063
Animal health pro-forma (keeper registration)	E1058667
Sheep ETAS registration form	E862865
Sheep ETAS: computer desk instructions	E1000721
Requesting SAMS reports: computer desk instructions	E147730
Forms that may be necessary to complete on Farm	
Blank secondary SG2 inspection report form	E1266711
Registration form to complete on farm – Main Holding	E728045
- seasonal	E728470
- remove registration	E728059
Pro forma for calculating live discrepancies	E311555
Movement restriction notice (SG3 & SG4)	E311654
ETAS feedback form (for keeper to report faults with tags)	E1147321
Reference material that may be useful on farm	
Holding register- 2011 issue	E1223616
Movement Document- cover information- 2011 issue	E1223615
Movement Document- 2011 issue	E1223614
Replacement tagging (flow-chart)	E400634
How to tag your animals (flow- chart)	E396419
Nedap electronic reader – basic instructions	E1065615
Bio-Control reader manual	E1139767
Sheep scab letter- issue 2011	E1223589
SMR8 – annex to classify XC breaches	E819441
Rule of Thumb 2011	E1278945
Post Inspection	
Guidance for updating and returning information to SAMU	E309166
Letters – written warning- enforcement action	E285792
Letters – cross compliance breach found	E1233177
Inspection data capture guidance 2011	E1313340
Post inspection checklist	E807914
Template copies of system generated letters/ documents	
Blank SG1 inspection report form	E1147138
Blank SG2 inspection report form	E1147361
Letters – inspection results – no errors found	E1232906
Letters – inspection results – errors found	E1232937
Business Warning- paragraph for insertion to inspection results letter (errors)	E285612

Letters – 28 days to apply a replacement tag	E310908
Miscellaneous	
QMC checklist 2011	E1275862
QMC selected cases 2011	tbc
QMC blank sheet	E813402
Extract from AH guidance relating to recording deaths	E834201
Annual Inventory 2011 – keeper return to DEFRA	E1232282
Licensing of 7000 landless keepers of sheep - guidance	E575948
LFASS declaration checks 2011	
Selection and return information spreadsheet	E1275271
Guidance	E1004546
Report Form	E1004538
Inspection Letter	E1016663

SECTION 1

1. Introduction

1.1 Scottish Government inspectors carry out Sheep and Goat Identification Inspections (SGII) annually. These inspections check that keepers of sheep and goats are complying with the identification and traceability requirements in [European](#) and [Scottish](#) law. It is essential for food safety and animal health that keepers understand and comply with these requirements.

1.2 In January 2010 the Scottish Government issued [guidance to all Keepers](#) which explained the sheep and goat identification and traceability requirements from 31 December 2009. Keepers may choose their own records format. However, in April 2011 a revised Movement Document pad and revised [Holding Register](#) were produced.

1.3 Each year our risk analysis of all sheep and goat keepers selects the holdings we inspect. Our statutory inspection targets are 3% of registered holdings and 5% of sheep/goats in the national flock/herd (taken from a number of sources including the annual inventory returns). At 1 January 2011 there were 15,078 businesses using 20,613 registered holdings, 4,126,928 sheep and 3,567 goats. Non-compliance by keepers can lead to penalties affecting payments under direct support schemes including the Single Farm Payment, and rural development support measures including the Less Favoured Areas Support Scheme (LFASS). When we find non-compliance we take enforcement action; this ranges from issuing guidance to criminal prosecution.

Businesses selected for a cross compliance inspection will not necessarily be subject to a SGII.

We capture our inspection findings on to the Scottish Integrated Administration and Control System (SIACS) database and send the results to the European Commission.

1.4 The guidance on [Biosecurity - for officials of the Scottish Government](#) details disinfecting procedures for farm visits. You must follow this guidance.

1.5 Inspecting livestock is potentially hazardous. Please take reasonable care for the health, safety and welfare of yourself and others during an inspection. Line managers are responsible for the health, safety and welfare of their staff and they must ensure that inspectors understand the health and safety guidance before beginning an inspection. Speak to your Health and Safety Liaison Officer (HSLO) if you need further information or clarification.

1.6 All sheep and goats inspectors should be aware of the "[codes of recommendations for the welfare of sheep](#)" and the "[codes of recommendations for the welfare of livestock - Goats](#)".

2. Legislation

[Council Regulation \(EC\) No 21/2004](#) establishes a system for the identification and registration of ovine and caprine animals; it sets out the identification and traceability requirements for sheep and goats. [Commission Regulation \(EC\) No 1505/2006](#) requires an inspection regime to check compliance with EC 21/2004; it came into force on 1 January 2007.

The domestic legislation is [The Sheep and Goat \(Records, Identification & Traceability\) \(Scotland\) Order 2009](#). This legislation implements EC 21/2004.

[Commission Regulation \(EC\) No 1975/2006](#) provides for the application of cross-compliance penalties on rural development support measures, including LFASS. [Council Regulation \(EC\) No 73/2009](#) stipulates the requirements of cross compliance and provides for penalties on the direct support schemes, including the Single Farm Payment. [Commission Regulation \(EC\) No 1122/2009](#) lays down detailed rules for the implementation of cross compliance. Scottish Statutory Instrument [SSI 2004/518](#) provides inspection and enforcement powers for these regulations.

3. Objectives of a Sheep Inspection

3.1 Main objectives:

1. To ensure compliance with the five key requirements of the regulation:
 1. Keeper registration
 2. Records
 3. Notifying moves to SAMU
 4. Completion of movement documents
 5. Tagging
2. To carry out a comprehensive holding based check, verifying that the farm records are complete and accurate by comparing them to:
 - reported movements;
 - on farm documents; and
 - the number and identities of sheep present.
3. To produce an inspection report demonstrating that we have effectively checked compliance with the requirements, and taken appropriate action where we found non-compliance.

3.2 Inspection report – write the inspection report so that any person with a reasonable understanding of the industry and the inspection procedure can readily interpret the findings. Action taken as a result of the inspection must be clear. This report is kept on file with all relevant documents, including a complete record of follow up action.

3.3 Non-compliance – if you find a breach, apply a proportionate level of enforcement action. If the breach relates to the record keeping or tagging requirements, cross compliance penalties may also apply.

3.4 Informing the keeper of the inspection results – the keeper must be informed of the inspection findings. You must make them fully aware of any problems you found, any follow up action required, the enforcement action taken as a result, and of any cross compliance penalties to be applied. They must be informed if information will be passed to other bodies, for example, about animal welfare concerns.

3.5 Inspection letters – following the on farm check, summarise your findings in the 'summary of inspection findings table' and the system will generate an inspections findings letter. This letter must be sent to the keeper no more than one month after concluding the inspection. The system will include a business warning within this letter, where you have indicated this is required. If cross compliance penalties are to be applied, or a written warning is the appropriate enforcement action, you will need separate letters. They must be sent to the keeper as soon as possible, with copies kept on file. If a goat inspection has been carried out then a manual letter is available in objective.

3.6 Scope of inspection – we inspect at business level. The inspection must include all animals owned by the business and all relevant records. The inspection period is the year prior to the start date.

SECTION 2 – THE FIVE KEY REQUIREMENTS

1. Keeper Registration

1.1 The requirements

Any holding where sheep or goats are kept must be registered with Animal Health. Keepers must register every holding they use; this includes the main farm code, sub farm codes and seasonal locations. The requirement applies whether or not a holding is covered by a concession (section 2,6). Several keepers can be registered on the same location. Common grazings are in general not registered. Provided the crofter is registered at the croft then the use of the common grazing for sheep is assumed – it forms part of the registered holding within the Crofters Commission.

If sheep or goats are on a holding and no keeper is registered, this is a serious breach of identification and traceability legislation. You must rectify the breach, whether or not the keeper you are inspecting is at fault.

If a keeper is registered but no longer has sheep or goats, remove their registration with Animal Health. This will prevent them being selected for a future inspection. The landowner does not need to be registered if they do not have sheep or goats.

1.2 Pre-inspection check

Check that every holding listed on (or added to) the inspection report form (SG1) is registered with Animal Health. A spreadsheet listing all registered holdings is available at E1307063. Complete the Animal Health proforma (E1058667), answering 'yes' to 'is the holding registered?' where it appears on this spreadsheet. You can refer to a holding's movement reports (SAMU) to establish if it is used for sheep and, if necessary, discuss with the keeper at inspection.

Check that the keeper being inspected is registered at all the holdings where you expect to find animals. Where the holding is registered and it is a main or permanent code, you can answer 'yes' to 'is the inspected business registered on this holding?' Where the holding is not registered, you can answer 'no' to 'is the inspected business registered on this holding?' Where there are registered seasonal holdings, complete the proforma as far as you can and pass to your local Animal Health Office for completion of information on seasonal registration.

1.3 Inspection – farm office

If a keeper's registration details are incorrect, complete a form(s) with them to obtain the correct information. The forms are on objective:

- for seasonal holdings (Objective E728470)
- for main holdings (Objective E728045)
- to remove registration (Objective E728059)

1.4 Action after inspection

Pass the completed form(s) to the local Animal Health office, retaining a copy and receipt on file. Take enforcement action, normally issuing guidance. Cross compliance penalties do not apply.

2. Records

2.1 The requirements

The holding register comprises all information available from farm documents and any information held on a central computer database that the keeper elects to use. Keepers can choose their own records format. The Scottish Government holding register issued May 2011 is a useful reference point and makes clear mandatory information requirements. The requirements apply at holding level.

Additional requirements associated with electronic identification have been in force since 1st January 2010. Animals born since this date must have their identification recorded when they are identified, move or die. A slaughter tag derogation is available for lambs less than 12 months of age. The single slaughter tag shows only a flock mark, each pair of breeding tags have a five digit individual number. The identity printed on an animal's tag is that which must be recorded. The intended management of the animal is not relevant. The record keeping requirements apply to goats although the use of electronic tags is optional.

There is no requirement to record the identities of animals born before 1st January 2010 in the holding register. The only exceptions are the record of replacement tagging and the identification record, if the animals have been identified for the first time.

2.2 Inspection – farm office

Verify the keeper's records using the SAMU 2 location report and other farm documents. Update the SAMU report, if necessary; it acts as a file copy of the movement records for the inspection period. Check other record keeping requirements.

Note the number of animals you expect to be present using either:

- the keeper's running total, subject to an arithmetic check and corrected if necessary, or
- the annual inventory figure, adjusted for movements on and off, births and deaths.

The tagging profile is completed for electronically identified animals, with the flock marks of all animals expected on the holding and the range of numbers expected for home bred animals. You will use this to cross check with the animals present on the holding.

2.2.2 Movement Records- Critical Control Point Information.

The keeper may elect to use information supplied to the ScotEID database by a Critical Control Point (CCP) in preference to recording the identities required in the movement record.

2.3 Physical inspection

Compare the number of animals you count with the number you expected. A difference indicates that the keeper has failed to maintain accurate records. Discuss with the keeper and try to identify the cause(s).

Examine the tags of a representative sample of sixty animals. Compare the flock mark(s) of purchased sheep with electronic identifiers to the flock marks in section A of the tagging profile. Compare the full identity of home bred sheep with the expected numbers in section B of the tagging profile. If unexpected sheep are present, extend the sample by a further sixty electronically identified sheep in the first instance. If you find further unexpected sheep, check all electronically identified sheep on the holding. Treat goats identified since 1 January 2010 as if they are electronically identified sheep.

If you find unexpected animals, the keeper has failed to maintain accurate records. Discuss with the keeper and try to identify the cause(s).

2.3.2 Requirement to compare the identity of animals present to the tagging profile

2.3.2.1 Homebred Animals- no identification or replacement tagging record

Where the record checks have already established that a record of replacement tags or a record of identification has not been kept, a cross compliance breach of medium severity will apply. There is no need to compare the identities of home bred animals to the tagging profile, nor to extend the tagging profile (unexpected animal) sample, if this is the only reason for doing so. The check would not create any difference in the breach applied, it is simply an alternative method of checking compliance with the same requirement. Use suitable comments on the report form to explain why the check was not performed.

Flock marks of purchased animals would still require to be checked against the tagging profile to ensure that flockmarks/individual numbers have been recorded in the movement record for EID animals.

2.3.2.2 Homebred Animals- entries missing from the identification or replacement tagging record

Where the record checks have established that entries are missing from the identification or replacement tagging record, it is necessary to compare the identities of home bred animals to the tagging profile and to extend the tagging profile (unexpected animal) sample to establish the scope of the problem. Where 10% or more of the animals checked do not have their identities present in the record, the severity of the breach applied would be upgraded to medium and a higher penalty applied.

2.3.2.3 Purchased Animals- movement recording breaches

Where a high severity cross compliance breach is to be applied for failure to keep records or failure to record five or more movements, it is not necessary to compare the flock marks of purchased animals to the tagging profile or to extend the tagging profile (unexpected animal) sample. The check would not create any difference in the breach applied, it is simply an alternative method of checking compliance with the same requirement. Use suitable comments on the report form to explain why the check was not performed.

In all other cases, it is necessary to compare the identities of purchased animals to the tagging profile and to extend the tagging profile (unexpected animal) sample to establish the scope of the problem. Where 5 or more flock marks of purchased animals do not appear in the records, the severity of the breach applied will be high. Where any one flock mark does not appear in the records the severity of the breach applied will be medium.

2.4 Action after inspection

2.4.1 Sending report to AIT for consideration of missed reads

If purchased animals have been found and it has not been possible to identify the record keeping fault, a report can be sent to AIT to consider if the animal(s) are the result of a missed read at a Critical Control Point (CCP). You can find further information on the use of CCPs at section 6 of the Keeper's Guidance.

You will have identified on the tagging profile if CCP information shows batches with mixed flock marks. If this is the case it is possible that purchased animals with flock marks that differ from the rest of the batch arrived but their flock mark does not appear in the records, as a result of a missed read.

In such cases, please send a report to AIT, showing:

- Farm Code
- Full identity of all unexpected animals
- Details of any movements that you have added to the SAMU report at inspection, and
- Any information from the keeper that suggests that the animal's tag has not been read at a Critical Control Point.

AIT will search for the individual number being read previously at a CCP. The locations where the animal is known to have been can be linked, using SAMU reports, with the inspected location. Where the evidence supports the fact that the animal's tag has not been read at a CCP, a justification will be supplied for file and this may be considered in the application of cross compliance penalties. At time of writing, discussions are ongoing regarding cross compliance penalty implications where there is elective use of CCP (Critical Control Point) information as part of the movement record and this information is incomplete. Update will be provided when position is clear.

This is liable to be a rare situation given that we are only comparing the flock marks of purchased animals with their recorded information.

2.5.2 Enforcement action

Take enforcement action for every breach found. The principles underpinning our enforcement action are provided at section 3, 3. Examples of enforcement action for common record keeping faults are:

No records kept – issue a written warning. Consider using a movement restriction.

**Failure to record replacement tags or identification, or
Failure to include batch within batch details or individual numbers in a movement record, or**

**Failure to record deaths for animals born after 31 December 2009, or
Mandatory information missing from movement records,**

– issue a verbal warning where a significant amount of information is absent. Guidance will normally be sufficient if records have been kept but are incomplete.

Requirements met at business but not holding level – guidance will normally be sufficient.

Further information on appropriate use of enforcement measures is provided at section 3,3.

2.5.3 Cross compliance penalties

Cross compliance penalties apply where:

- the keeper's records do not meet requirements and the information is not available from farm documents or a central computer database at the keepers' discretion;
- the number of animals found is significantly different from the number shown in the records. The keeper's records are not accurate/complete;
- the keeper has not been replacing lost tags and/ or the record of replacements has not been maintained;
- flock marks of purchased animals found on the holding are not recorded;
- details of home bred animals found on the holding are not recorded.

Guidance on the application of cross compliance penalties is at section 3, 4. The table at appendix 5 classifies common faults, with the percentage reduction applied for first time negligent offences.

3. Notifying Moves to SAMU

3.1 The requirements

The receiving keeper must notify SAMU of any move within three days of the movement taking place. If the movement is through a Scottish market, they will notify SAMU for their clients. Notification can be made electronically, or by posting (or faxing) the white copy of the movement document to SAMU.

3.2 Pre inspection check

Obtain SAMU reports for every holding listed on, or added to, the SG1. Section 3, 1 provides further information on using SAMU reports.

3.3 Inspection – farm office

Compare the SAMU 2 location report(s) with the keeper's records and other farm documents. If you find errors, correct the report. Add any movements recorded on farm that don't appear on the report. The report(s) become a file copy of the keeper's verified records for the inspection period.

If you need to amend the number of animals in a market movement, compare the SAMU 3 location report with the farm invoices to establish which market lots need changed. SAMU hold movement details (including market details) at holding level. SAMU staff use market lot numbers when amending the database, note the amendments required in these terms on the 2 location report for return.

3.4 Physical inspection

If the number of animals you find differs from the number expected, investigate with the keeper if there have been unreported/unrecorded moves. Update the SAMU report and keeper's records to reflect your findings.

3.5 Action after inspection

If you have changed or added movement details, send a copy of the 2 location report to SAMU to update the database. The procedure is on objective (E309166). Keep a copy of the document(s) sent and receipt on the file.

The keeper inspected is responsible for notifying movements on to their holdings. If details of 'on' movements are missing or incorrect on the original SAMU report(s), take enforcement action. Normally, issuing guidance will suffice. If you are concerned about the frequency of failure to notify movements, issue a verbal warning. Information on appropriate use of enforcement measures is provided at section 3, 3.

Cross compliance penalties do not apply.

3.6 Landless Keepers- 7000 codes

We identify landless keepers (i.e. those with no permanent land) for administrative purposes by allocating them a main farm code where the four digit holding number starts with a 7. SAMU information held (and reported) should identify the actual pieces of land that the animals have moved between. No movements to SAMU should use holding codes that begin with a '7'. Where movements have been reported using these codes, the actual location should be established and reports amended at inspection.

4. Completing Movement Documents

4.1 The requirements

Keepers must complete a movement document (see Appendix 3&4) for every move not covered by a concession and keep a copy for three years. If animals are bought through a market the movement document will be a purchase invoice or market pass. The Keeper's Guidance (page 17) describes movement document requirements, including changes being phased in from 31 December 2010. Animals born since 1st January 2010 must have individual IDs recorded on the movement document for moves on or after 1st January 2011. A revised movement document (Appendix 4) was issued in May 2011 to accommodate this change. One list of IDs on farm or on ScotEID database is sufficient.

4.2 Inspection – farm office

Compare all movement documents with the SAMU report to ensure movement details are recorded accurately. Check that each document has all information present. There should be a movement document for every verified move on the SAMU print. Any discrepancies found on movement documents should be recorded on the SAMU print.

If your movement document check identifies unreported moves or inaccurate reporting of moves, you must update the SAMU print and keeper's record to reflect any changes.

4.3 Physical inspection

If the number of animals you find differs from the number expected, movement documents may be part of your investigation. If you discover additional information, you must update the SAMU print and keeper's record to reflect this.

4.4 Action after inspection

If you find faults, take enforcement action, normally issuing guidance. If there are significant numbers of missing or incomplete documents, issue a verbal warning.

Cross compliance penalties do not apply.

5. Tagging

5.1 The requirements

5.1.1 Identification

How an animal is tagged depends on the legislation in place when it was first identified. Legislative changes in the last few years mean that:

- Since 1 January 2010, for breeding sheep, two tags must be applied and one must be electronic.
- Since 1 January 2010, for sheep under 12 months old and intended for slaughter before 12 months, a single electronic tag showing only the flock mark must be applied. A keeper can elect to identify as breeding animals.
- Since January 2008, animals have had to be identified with two matching tags unless they were intended for slaughter.
- Since July 2005, animals have had to be identified by the time they reached nine months old or before they left the holding of birth, whichever was sooner.

Note:

- Sheep with no ears - an ID should be allocated but the tag(s) kept and a comment recorded. When they move the keeper should be advised to contact the destination and the tag(s) should be passed to the receiving keeper.
- If faulty tags are found at inspection the keeper should complete and submit an ETAS feedback form (copies at E1147321).
- Where you become aware of the fact that electronic tags are not reading at inspection, replacements should be fitted and recorded.

The rule of thumb guide at appendix 7 gives a practical interpretation, relating the legislative changes to the animals that may be present on farm. Appendix 1 illustrates current requirements for sheep. Further information is in sections 1 and 2 of the Keeper's Guidance.

5.1.2 Flock marks

An animal must be identified with a tag bearing the flock mark of the holding on which it was born. If the holding of birth is covered by a concession (section 2,6) then the flock mark of the main farm can be used.

5.1.3 Replacement tags

Lost tags must be replaced within 28 days of discovering the loss. We record if there are missing tags within our 60 tag sample and whether we accept the loss as newly discovered. When a tag is replaced, or slaughter lamb upgraded to breeding animal, it must be recorded in the holding register. Appendices 1 and 2 illustrate the requirements for replacing tags.

5.2 Inspection – farm office

Confirm that unused tags are kept in a safe place. Approved tags will have PAS66 embossed or printed on the inside of them. If purchased animals are on the holding, the keeper should have a supply of red replacement tags unless using like for like replacements. You will need the individual number of the next homebred tag to check that the identification and replacement tag record is complete.

5.3 Inspection – physical inspection

Carry out a 60 animal ear tag check on every holding. The animals selected must be representative of the animals on the holding. If EID animals are present they must be included in the sample. Examine each ear tag to confirm that animals have been identified correctly. If you find tagging faults extend the sample. If you find tags missing, the keeper must replace these and record the details in their holding register but you need not extend the sample.

5.4 Action after inspection

If sheep have been tagged but they have lost their tags and it was not possible to replace them at inspection, issue the 28 day letter produced with the inspection pack. Check sheep ETAS within 28 days to confirm that the keeper has ordered tags. If necessary, remind the keeper to order tags within the 28 days. Record the results of your checks on file. If the keeper does not order tags, an intentional cross compliance breach applies. If sheep have never been tagged and should be, or have tagging faults, a cross compliance breach applies on discovery.

Take enforcement action (see section 3, 3 for guidance). Issue guidance where the keeper is mainly meeting the tagging requirements. Issue a written warning where the keeper has knowingly received untagged sheep/goats, or is obviously not complying with the regulations for home bred animals.

If you find tagging faults, or where it cannot be accepted that tags are being replaced, cross compliance penalties apply. The table at appendix 4 provides classification and the percentage reduction for first time negligent offences. Section 3, 4 provides further information on cross compliance penalties.

6. Using Concessions

6.1 Available concessions

A concession can be used if:

- stock graze a seasonal holding within five miles of the main holding and do not mix with another keeper's animals; or
- a crofter uses an active share of the common grazing within the same township and the keeper of the animals does not change; or
- holdings are covered by a licence.

If the keeper uses the five mile concession, he must record the seasonal land CPHs and the dates of occupancy. If a crofting concession is used, it must be recorded in the holding register. A licence must have been obtained by a 7000 keeper, from SGRPID, and a copy of that licence kept. See appendix 12 also.

6.2 Using five mile, crofting or licence concessions

The seasonal holding must be registered as a place where sheep are kept. The keeper must be registered at that holding with Animal Health. For movements between concessionary holdings, there is no need to:

- record movement details;
- complete a movement document;
- report movements to SAMU;
- tag animals before they are nine months old.

When tagging sheep kept on a location covered by a concession, the keeper can use the flock mark allocated to the main holding.

6.3 Recording internal business moves of electronically tagged animals

For internal business moves, the movement record for animals born or identified after 31 December 2009 does not need to include identification information, this applies regardless of distance. All other requirements apply, unless the movement is made under one of the concessions listed at 6.1.

7. Other Requirements

You may find breaches of legislation not directly related to a sheep inspection. You must act on, and record details of, any breach you identify. Examples of the kind of problem you are most likely to find are listed below.

7.1 Welfare concerns

If you find evidence of an animal welfare problem, report the facts to your PAO. They will seek advice from the Divisional Veterinary Manager (DVM). If welfare is a known concern it can be helpful to arrange a joint visit with the DVM.

7.2 Notifiable Disease

The presence of a number of livestock diseases within a flock must be notified to the DVM. The list of notifiable diseases is available from the link below, information pages for each disease can also be accessed.

<http://www.scotland.gov.uk/Topics/farmingrural/Agriculture/animal-welfare/Diseases/disease/notifiable>

From 17 December 2010, the [Sheep Scab \(Scotland\) Order 2010](#) requires any person who knows or suspects that sheep in their possession or care have sheep scab to notify their local DVM as soon as possible. The order does not apply in the Shetland Isles where the [Sheep Scab \(Shetland Isles\) Order 2003](#) remains in force.

If at inspection, you become aware that sheep are exhibiting symptoms that could be associated with sheep scab on an individual farm or within a defined local area, you are required to inform your local Animal Health Office by e-mail and copy the e-mail to the inspection file. The Shetland Islands Council would be informed in Shetland. Include in the e-mail the symptoms you witnessed, an approximation of how many sheep were affected and the location. You are not expected to be able to distinguish between sheep scab and diseases that exhibit similar symptoms, for example, lice. The Scottish Agricultural College website provides some helpful [information](#).

Sheep may be suspected as being infected with sheep scab if one or more of the following symptoms are exhibited:

- Mild to excessive rubbing/scratching against fence posts etc
- Mild to excessive nibbling and biting
- Dirty areas of fleece due to rubbing and scratching - especially with the hindfeet behind the shoulder.
- "Nibble" (touch hypersensitivity) response, spontaneous or in response to handling or manipulation of a lesion
- Tags of fleece on flanks due to biting or rubbing (similar to lice infestations)
- Clean areas of fleece due to licking/biting at or near lesions*
- Standing apart from flock, dull and depressed*

*Only when in combination with other symptoms described

During advanced stages of disease:

- Areas of wool loss and bare areas especially on shoulders and flanks
- Poor body condition
- Clumping or clotting of wool
- Damaged moist red skin
- Dry crusty scabs with moist red borders

7.3 Recording of Deaths

Inspectors will check during the course of a sheep inspection that the month and year of death for each animal born or identified after 31 December 2009 is recorded. Where a keeper fails to maintain these details, this will be a breach of cross compliance (SMR 8) that is addressed by the inspection.

It is a legal requirement that the keeper maintains a record of deaths found at every inspection of their animals. This record must include the full date and the number of animals. The record must include the deaths of animals that have not yet been identified. Failure to meet this requirement is a breach of cross compliance (SMR18) and details should be passed to the local animal health office.

7.4 Unburied carcasses

Carcasses must not be left unburied. This is a breach of [The Animal By-Products \(Scotland\) Regulations 2003](#), which the DVM is responsible for enforcing. You should report details to the PAO who will liaise with the DVM.

7.5 On-farm burial of stock

Since 1 October 2003* the EU Animal Bi-Products Regulations have prohibited on-farm burial or burning (unless using an approved incineration facility) of fallen stock. There is a derogation for areas designated as "remote". [Click here for the Remote Area map](#). If you discover a breach, notify the local authority who will take appropriate enforcement action. Please copy breach details to the [Customer Service Desk](#) to consider action necessary for the breach in good farming practice.

*A derogation to allow on-farm burial was introduced from 00:01 hrs on 5 August 2007 to 00:01 hrs 13 August as a result of the 2007 foot and mouth outbreak.

SECTION 3 – INFORMATION USED AND BREACH ACTION

1. Using SAMU reports

1.1 Aim

To establish by cross checking the records with on-farm documents if all animal movements have been accurately reported to the SAMU database, and update the database if necessary.

1.2 Description

A SAMU report shows all movements reported for a given holding. You set the date parameters when requesting the report. All reports you use must cover the inspection period – the year prior to the inspection start date.

The 2 location report provides movement information in a format that should mirror the holding register. It is aggregated by the system from information in the database.

The 3 location report shows all movements from farm to farm. If a market is involved in the movement, think of it as a 'third' location. For example, if a movement has taken place from the holding being inspected to a market and the animals have then been split into several lots going to different farms, the 2 location report will show the animals moving off the farm to the market. The 3 location report will show several movements from the farm to another farm, all with the same date. The number of animals for these moves should equal the number of animals shown on the 2 location report. The 3 location report also shows the unique flock mark(s) for each market lot / abattoir move if information has been uploaded to the Scot EID database by a CCP.

The information on the database is stored as shown on the 3 location report. To make an amendment to the number of animals involved in a market move, it is necessary to know which farm to farm movement details should be changed. The inspector must compare farm invoices to the 3 location report to establish this and include the market lot numbers on the return to SAMU to allow updates to be made.

1.3 Pre-inspection

Request a 2 location SAMU report for each holding listed on or added to the SG1. The report(s) must cover the 12 months before the inspection start date. You should take SAMU reports no more than three days before the inspection. Use comments to explain if no movement details for a holding are available on SAMU. You'll find instructions for requesting and printing SAMU reports in Objective E147730.

If the 2 location report shows market or abattoir movements, request a 3 location report for the holding covering the same period. If there has been a large number of market movements in the period, the 3 location report can be bulky. If so, you can reduce the report size by deleting details of movements that did not go through a market or abattoir. If the size of the inspection necessitates several visits to the farm, you may choose to identify on the 2 location report those market moves where the number of animals needs changed or any moves where CCP information is to be used. You can then select and print only the relevant details from the 3 location report.

1.4 Inspection

1.4.1 Identifying moves related to the inspected business

SAMU reports show the movements reported for the requested holding regardless of the sheep keeper. The print may show movements that don't relate to the inspected business. You don't need to verify these movements but you should clearly mark them on the SAMU report and comment on the SG1.

1.4.2 Verifying the SAMU information against the holding register

Check that:

- all movements reported to SAMU are recorded in the holding register;
- all movements recorded in the holding register have been reported to SAMU;
- all movement details on the SAMU report are accurate;
- movement documents are present on farm for every move reported to SAMU; and
- all movement documents on farm have a corresponding move on the SAMU report.
- All mandatory information is on the movement document.

1.4.3 Completing the SAMU report

You can verify a move if you find a corresponding entry for the move in the holding register or a movement document. Record your findings by ticking the holding register or movement document present tick box on the SAMU report. If all mandatory information is present on the movement document, tick the movement document complete box.

If you find a movement that's not on the SAMU report, add it unless a concession is operating. If movement details are incorrect, amend them. Instructions for updating and amending the SAMU report are in Objective E309166.

If the SAMU report shows a movement not in the holding register, establish whether the move is by the inspected keeper's business. If so, carry out minor updating if information can be found on farm documents or record a movement recording discrepancy.

You must update or correct the SAMU print and the holding register with movement details you discover during and after the physical inspection.

Points to Note:

- A location 3 print will show the correct movement date.
- The location 2 will always show the market date.
- If the location 3 is correct then there is no need to amend the date on the location 2.

- There should be no movements on the database that involve holding codes allocated to landless keepers (7000 series). Where this is the case establish the actual locations that were involved in the movement and correct the report. Refer to section 2, 3.6 for further explanation.
- If different businesses are moving sheep from one holding in a single movement, don't amend the number on SAMU unless it is known to be wrong but comment how many were from the business you are inspecting.

- Where there are imports / exports to and from Northern Ireland then this will be shown on the print as 98/860/7788 for imports and 98/860/7777 for exports. Moves to and from the rest of the world will be shown as 98/860/7799 for imports and 98/860/7766 for exports. Please use these codes if you have additional movements to add in these scenarios.

1.4.4 Outcome

At the end of the inspection, the SAMU report(s) becomes the file copy of the inspected keeper's movement records.

1.5 After inspection

Return the SAMU report(s) to SAMU to update the database, following the instructions in objective at E309166. File a copy of the report(s) returned to SAMU and the receipt from the mailbox.

2. Use of the Tagging Profile

You need only complete a tagging profile for electronically identified (EID) animals.

2.1 Aim

For animals born or identified after 31 December 2009, you must check the recorded information against the animals physically present using the flock mark of purchased animals and the full identification number of homebred animals.

2.2 Description

The tagging profile allows you to gather the information you need during the record check. Check the identities you see at the physical inspection against the prepared list. You do not need to locate individual animals in the records or revisit the records following the physical inspection, unless you find problems.

2.3 Purpose

Comparing the tagging profile to the animals physically present verifies that the keeper is:

- recording all movements;
- recording identity information for EID animals when they move;
- maintaining an identification record;
- maintaining a replacement tag record.

2.4 Completing the profile (farm office)

2.4.1 The animals to include

Sheep born, or tagged for the first time, after 1 January 2010 must be electronically identified. Older sheep may have electronic identifiers, especially if these have been used for replacement tags.

For goats, electronic identification is optional but the need to record identification details in the movement records is mandatory. Complete the profile for goats born or identified after 1 January 2010 in the same way you would for EID sheep, whether or not electronic tags have been used.

2.4.2 Record flock marks of purchased EID animals

As you check the records, record the flock marks of animals moved onto the holding in section A of the tagging profile. Only use the ScotEID information from the SAMU 3 location report if the keeper elects to do so and would otherwise have a cross compliance penalty for incomplete movement records for 2011 'on' moves, the information can be used directly for 2010 'on' moves but be aware that not all CCP's were uploading identity information, especially in the early part of 2010.

You need only record the flock marks of animals with electronic tags. The keeper must include full identities of breeding animals and flock marks of slaughter animals in the movement records for these animals. There is no need to include this information in the movement records of animals born or identified before 1 January 2010.

2.4.3 Record flock marks and identity range of homebred EID animals

As you check the records, record flock mark information in section A of the tagging profile and the tag range used for each flock mark in section B.

The keeper's identification record and replacement tag record must have details of all the tags applied. Compare the number of tags ordered on ETAS with the unused tags on farm as a guide when deciding if the records have been maintained.

If you record information at this stage accurately and completely, you are less likely to find unexpected animals at physical inspection. If you do find unexpected animals, you will need to extend the identity sample and investigate the actual record keeping failure. This will mean returning to examine records and on farm documents after the physical inspection. It is really important that you are thorough and discuss any anomalies with the keeper at this stage.

2.5 Completing the profile (physical Inspection)

Record the flock marks of all EID animals in the representative sample (60 sheep) you used for the tagging check – in section C. Check that all the flock marks recorded also appear in section A. If you check home bred animals with electronic tags, confirm (by answering question) that the individual numbers are within the expected range.

In section D record the full identity of any animal with a flock mark not listed in section A or, for home bred animals, not within the expected range of identities in section B. A slaughter animal will only have a flock mark printed on its tag but, when the tag is read, an individual identity including a six digit number will be displayed. You must record the full number and state that it is a slaughter animal.

If you record an unexpected animal in section D, extend the identity sample by checking a further 60 EID animals. If you need to record additional unexpected animals in section D, extend the identity sample to include all EID animals present on that holding. Do not include animals that are not tagged or have conventional tags in the extended identity samples. Record the number of animals checked and identity failures found in the first sample, in the physical inspection table on page 6 of the SG2. Record the numbers of animals checked and failures found in the second sample, in table 2 on page 6 of the SG2.

2.6 Investigating unexpected animals

2.6.1 Home bred animals

If the identification and replacement tag records do not include the individual identities of home bred animals, check if the missing information is available from farm documents. If it is, update the records. Record minor updating in the comments box on page 4 of the SG2 and add an explanation to the tagging profile.

If the information is not available, take enforcement action to rectify the existing problem and ensure that the keeper maintains the records correctly in the future.

A cross compliance breach will apply for failure to update the identification or replacement tag within 48 hours.

2.6.2 Purchased animals

If animals are present with flock marks that are not in the records, it is likely that movements have not been recorded or reported, or animal identities have not been included in the movement records.

The keeper may have information to help your investigation; ask the keeper to provide any documents that may explain the unexpected animal's presence.

2.6.2.1 Unreported movements

Comparing the physical count at inspection with the number of animals expected from the recorded information should indicate if there have been unreported moves. There may still be unreported moves even if the figures are close. Check any farm documents not already inspected, for example, invoices or diary or calendar.

If you discover movement details that explain the presence of the unexpected animal(s), comment on the tagging profile and take action to rectify the record keeping faults identified. A penalty will not apply if you can update the records and the SAMU print.

2.6.2.2 Identity details not included in movement records

Knowing the age and type of animal(s) that did not have their flock mark recorded, re-examine the records. If identity details are not included or appear incomplete for movements possibly involving the animal, use any available information to update the records. Invoices may provide more information on animal types. Scot EID information from the SAMU 3 location report could be used for 2010 movements or off movements in 2011 at will, for 'on' movements in 2011 use only if the keeper elects to do so on the basis that a cross compliance penalty would apply if this were not used.

If you discover movement details that explain the presence of the unexpected animal(s), comment on the tagging profile and take action to rectify the record keeping faults identified. A penalty will not apply if you can update the records and the SAMU print.

2.6.2.3 Missed reads at critical control points

AIT can investigate an individual animal if there is a chance that its flock mark is not in the farm records because of a missed read. We can access all CCP lists produced by Scottish Markets to find out if the animal has previously had its tag read. If so, the known locations of the animal are available to cross refer with the inspected holding, using SAMU information. This will allow us to decide if it is reasonable to accept that the animal is present on the inspected holding but not in the records because of a missed read. We will return documentation for file to justify our decision. If the animal is accepted as a missed read, this may affect the application of a cross compliance penalty. At time of writing, discussions are ongoing where there is elective use of CCP information and this is incomplete. Updates will be provided when the position is clear.

Every time an animal moves through a reader its 4% chance of not being read decreases until it is close to zero.

Send a report to the AIT mailbox to allow investigation of individual animals if:

- the animal is purchased;
- your investigation of potential unreported moves/identities in movement records confirms that the animal's details are not in farm documents;

- the numbers of animals you expected and found on the holding can be reasonably explained;
- CCP information is used as part of the movement records and that includes mixed batches
- Movements whose details (including invoice details) agree with the age and type of animal being investigated are of mixed batches.

Your report must include:

- CPH of holding(s) being inspected;
- the full identity of the animal to be investigated, including its five digit individual identifier if a slaughter animal;
- the animal's breed, age and sex;
- details or copy of the amended SAMU 2 location report if you have added any movements during the inspection; and
- the SAMU 3 location report with the batches highlighted that may be involved i.e. those of similar stock type to the animal in question.

Include any other information you think may help the investigation.

3. Enforcement Measures

3.1 Principles

We will take enforcement action every time we find a problem at an inspection.

Proportionate enforcement action applies to breaches of [The Sheep and Goats \(Records, Identification & Movement\) \(Scotland\) Order 2009](#). If you find a breach you must:

- ensure the keeper understands the requirement;
- explain how they should correct the breach and make sure they do;
- take appropriate enforcement action; and
- provide a detailed file record of all action.

Our enforcement principle is to take appropriate and proportionate action depending on the faults found, escalating where previous action has failed. Our enforcement framework is:

- Guidance
- Verbal warning
- Written warning
- Referral for prosecution (usually through the local authority)

We can also use a movement restriction to stop animals moving to and from holdings until problems are resolved.

Section 2 shows examples of appropriate enforcement action for common breaches. We are not obliged to take a set course of action for a given breach – we need to consider the appropriate action, case by case. If you are unsure how to proceed, ask your line manager or livestock co-ordinator. They will ask AIT for guidance if they need to.

If you believe that a keeper is attempting to mislead, or deliberately evade the ID and traceability requirements, we would expect you to issue at least a written warning. You should discuss such cases with your line manager or livestock co-ordinator and then ask AIT's advice.

3.2 Guidance

This will be your most common action. You must clearly state the problem identified, what should have happened and the action needed to put things right. Guidance can:

- be for future reference;
- relate to a problem that has already been fixed during the inspection – for example, keeper registration;
- require the keeper or inspector to resolve a continuing problem.

If you take follow up action, you should fully document the file at every stage. Include your guidance on the inspection report form (in the summary of inspection findings table) and explain it to the keeper.

The inspection letter will be populated from the text in this table and will be sent to the keeper for reference. You should give the keeper the opportunity to comment on the inspection report form.

You may issue guidance to the same keeper on more than one occasion, there is no compulsion to escalate the enforcement measure selected, a case by case assessment is required.

3.3 Verbal warnings

You can give a verbal warning if the keeper has not acted on previous guidance or you think they will not act on written guidance now. A written warning would be preferred to a verbal warning if the problem is particularly serious or if it is disputed by the keeper.

When giving a verbal warning:

- clearly inform the keeper that you are giving them a verbal warning;
- identify the problem;
- explain the requirement; and
- explain the action needed to correct.

You should state that you have given a verbal warning (and the date) in the summary of inspection findings table that will populate the inspection letter. If you take follow up action, you should fully document the file at every stage. Once the keeper has received and understood your warning, you should give them the opportunity to comment on the inspection report form.

3.4 Written warnings

You can use a written warning where guidance or a verbal warning has been issued but the keeper has made little effort to resolve the problem(s) highlighted. You could also issue a written warning immediately if a breach found at inspection is serious but does not justify immediate referral for prosecution. For example, you could use a written warning if a keeper has:

- deliberately evaded the ID and traceability requirements;
- deliberately attempted to mislead you;
- falsified information.

You must discuss the breach with your livestock co-ordinator/ line manager before issuing a written warning. They will consult AIT if they need further guidance. A written warning would normally be issued for a problem that the keeper needs to act on to resolve. It may relate to:

- a problem that could be rectified now by the keeper taking action set out for him; or
- the keeper taking future action when certain circumstances occur.

A written warning (Objective E285792) must:

- be dated and state clearly that it is a written warning;
- detail the problem(s) found and why the warning is needed;
- detail the requirement that the keeper has not met; and
- detail the action the keeper must take.

The action you set out for the keeper must be specific, realistic, assessable and, if it's needed to resolve an outstanding problem, have a set time scale. If you issue a written warning you would normally expect some follow up action.

You must record on the file details of all checks carried out, all written and verbal correspondence with the keeper and any other action you take. Issue the warning as a separate letter. In many cases it would be worthwhile delivering the warning letter personally or using recorded delivery.

You must record that you've issued a written warning and its date and purpose in the summary of inspection findings table that we will use to populate the inspection letter. You should discuss the written warning with the keeper and make sure he understands its content. You should give them the opportunity to comment on the inspection report form.

3.5 Prosecutions

Pass **all** potential prosecution cases to AIT before you go down this road. You will need to provide AIT with a report detailing the full facts and case history, including copies of warning letter(s) and other relevant correspondence. Cases referred for prosecution can be complex, but they usually fall into two categories:

- cases where there have been repeated warnings, often on multiple breaches but the keeper has made no attempt to resolve the problems found; or
- cases with very serious breaches of ID and traceability.

The Scottish Government aims to ensure compliance with the law and we try to achieve this by working with keepers. In general, therefore, we would not resort to prosecution if the keeper co-operates and attempts to resolve the problems found. In every case, you must fully document the file with all action taken and all correspondence (written and verbal) with the keeper.

3.6 Movement restrictions

You can use a movement restriction to stop animals moving to and from a holding. Movement restrictions are independent of other enforcement measures. Restrict movements if 'live' discrepancies are above 20%, if you are denied access to inspect, or no farm documents are presented. The 20% threshold is administrative rather than legal for sheep and goats. A 'live' discrepancy is one which remains uncorrected at the end of the inspection. For example:

- homebred animals not tagged by appropriate age;
- animals with missing tags not replaced at inspection;
- animals moved to another part of the business, not covered by a concession, and the animals have not been tagged;
- failure to record movements in the holding register;
- failure to notify movements to SAMU.

Use the form in Objective E311555 to calculate live discrepancies.

To serve a movement restriction complete a Movement Restriction Notice (SG3) on Objective E311654. When serving the notice make sure the keeper understands:

- why the notice has been served – you need to explain each individual problem;
- the requirement he is expected to comply with;

- the action he needs to take to correct any live discrepancies. You must set this out clearly, in writing. Each action must be specific, realistic and, in most cases, will have a timescale attached.
- how the restriction may be lifted – for example, you may agree a date for a follow up inspection or require that the keeper contacts the office when he has resolved the problems;
- that the restriction applies to the whole holding including other keepers' sheep and goats. In practice it may be wise for you to tell any other keepers affected by the restriction;
- that moving animals to or from a holding under restriction may result in the offending keeper being prosecuted;
- that the restriction will remain in place until the keeper receives a notice lifting it (SG4 - Objective E311654). Until that time, sheep or goats cannot move to or from the holding except under licence. Licences would generally be granted only if animal welfare was a concern. To obtain a licence, the keeper would need to contact the area office and the PAO would decide whether or not to issue one.

To lift a movement restriction issue form SG4 (Objective E311654) to the keeper. You should normally do a follow up inspection to check that the problem has been corrected before lifting the restriction.

If you have evidence that animals have moved to or from the holding under restriction pass a full report to AIT.

4. Cross Compliance Penalties

We apply cross compliance penalties if we find breaches of **record keeping** or **tagging** requirements. We **do not** apply penalties if breaches involve keeper registration, movement documents or notifying movements to SAMU.

4.1 Business warning paragraph in inspection result letter

If the **only** faults (record keeping and tagging) you find at inspection are caused by a failure to meet requirements when moving animals between holdings within the same business, you can indicate that a business warning paragraph should be included in the inspection results letter instead of recording a cross compliance breach. This only applies to **first** offences. If you have previously issued a business warning letter, you should treat breaches as if they relate to movements between businesses. You can issue a business warning letter for failure to:

- record internal business moves;
- maintain a distinct record of movements;
- record a separate annual inventory for each holding;
- apply ear tags before moving sheep off the holding of birth to another part of the business not covered by a concession; and
- use the flock mark allocated to the holding of birth when applying tags, on a unit not covered by a concession.

If you issue a business warning letter as a result of the inspection, **do not** record a breach of cross compliance. Indicate that a business warning letter has been issued on the inspection report form and on the capture screen – this should be clear from your comments entered in the summary of inspection findings table on page 9 of the SG2.

4.2 Cross compliance breaches

4.2.1 Failure to maintain correct records

We will apply cross compliance penalties for 'failure to maintain correct records' if the keeper:

- fails to keep records;
- refuses to provide records for inspection;
- fails to record mandatory movement details;
- fails to include identity information or the number of animals with each flock mark within a batch, for movements of animals born or identified after 31 December 2009;
- fails to maintain a replacement tag record;
- fails to record / replace missing tags within 28 days of discovery;
- fails to maintain an identification record for animals identified after 31 December 2009;
- fails to record the month and year of death of animals identified after 31 December 2009;
- fails to record the annual inventory;
- fails to maintain accurate records – the number of sheep present on the holding does not agree with the recorded information and the difference is beyond the scope of reasonable explanation;

- fails to maintain accurate records – the flock mark(s) of purchased animals or identity of homebred animals on the holding are not in the records

We will not apply penalties if:

- mandatory information is available from any farm document or from a central computer database and the keeper elects to use it. The keeper can keep the holding register in any format and we consider all farm documents and centrally held information to be part of the register;
- the annual inventory total does not match the figure in the records for 1 January, or no return has gone to DEFRA. This does not form part of the requirements of cross compliance.

4.2.2 Failure to correctly identify animals

We will apply cross compliance penalties for 'failure to correctly identify animals' if the keeper has:

- purchased animals that have never been tagged or do not have the correct number and type of identifiers for the age of animal;
- homebred animals over nine months old, born after July 2005, that have never been tagged;
- homebred animals over 12 months old, born after 18 January 2008, that have not been double tagged;
- sheep born or identified after 31 December 2009 that have not been electronically identified;
- sheep with an unacceptable combination of electronic identifier types;
- animals over 12 months old, born or identified after 31 December 2009, that have a single identifier. At inspection all animals will be taken to have reached 12 months on 1 July in the year after they were born;
- failed to use red replacements or tags identical to the original when replacing missing tags in purchased animals;
- failed to use the flock mark allocated to the holding of birth when identifying animals, and the holding is not covered by a concession (second or subsequent offence);
- not replaced missing tags within 28 days of discovering the loss and/or has not maintained the record of replacements;
- not replaced missing tags within 28 days, following the issue of a 28 day letter at inspection (intentional breach).

We will not apply penalties if:

- we identify an error that's not the fault of the keeper being inspected – for example, an animal moved on which the previous keeper has tagged incorrectly, provided the number and type of identifiers (EID v non EID) are correct for the age of animal.

If possible, you should rectify all tagging faults at inspection. If not possible to have all animals identified correctly on the day, the enforcement action you take must ensure that the keeper correctly identifies all his animals. Follow up checks may be appropriate.

4.3 Recording breaches of cross compliance

4.3.1 Repetition

For a sheep inspection you must establish manually whether any breaches you find are first or subsequent offences. The information is available from SIACS – select the ‘producer breach summary’ option from the Cross Compliance and GFP menu.

Repetition exists where the same line of the breach matrix at Annex 5 is breached at a second or subsequent inspection. Be aware that where there were several requirements breached at a previous inspection, you will need to consider the comments recorded to identify all affected lines of the breach matrix. Contact AIT if advice is required. You consider negligent and intentional breaches separately for the purposes of repetition – an intentional breach is not a repetition of a negligent breach even if it’s for the same offence.

4.3.2 Classification

The classifications for the most common breaches resulting from a sheep inspection are at Annex 5. The percentage reduction applied for first time negligent offences is also supplied for reference. If you cannot categorise an actual finding using this information, please discuss with your livestock co-ordinator and if necessary use CSD to consult AIT. You can find the percentage reduction that will result from intentional or repetitive offences on the cross compliance penalty matrix.

If you discover a breach that you suspect may be intentional, discuss with your livestock co-ordinator and prepare a report for AIT to consider before finalising the classification.

If the standard classification for the breach you find seems unduly harsh or lenient, please send full details to AIT, through your livestock co-ordinator. Although we can apply discretion in individual cases, it is essential that we act consistently across the country.

4.3.3 Recording the breaches

You should record cross compliance breaches on page 8 of the SG2; you capture the information on this page on to the breach recording screen on SIACS. In the SIACS sheep data capture, there is a question with a ‘yes/no’ radio button asking whether a breach of SMR 8 has been found. Answering ‘yes’ to this question calls the breach recording screen and you can enter data.

You should have summarised any problems found with records or tagging in the inspection findings table, with details of the enforcement action you took and an indication that cross compliance sanctions apply to your findings. You must explain your findings to the keeper. The inspection findings table populates the inspection letter that is sent to the keeper. You issue a separate letter to advise the keeper of the cross compliance penalty resulting from the sheep inspection.

4.3.3.1 Breaches to record

Record a maximum of **two** breaches in the breach finding table. **One** for ‘failure to maintain correct records’ and **one** for ‘failure to correctly identify animals’. Record the most serious breach, that is the one that would result in the highest percentage

reduction, considering intent and repetition. You can use the tables at appendix 5 to decide the classification.

Use comments to explain all breaches relating to either records or tagging. If you are not sure how to record breaches found, discuss with your livestock co-ordinator who will contact CSD for advice if necessary.

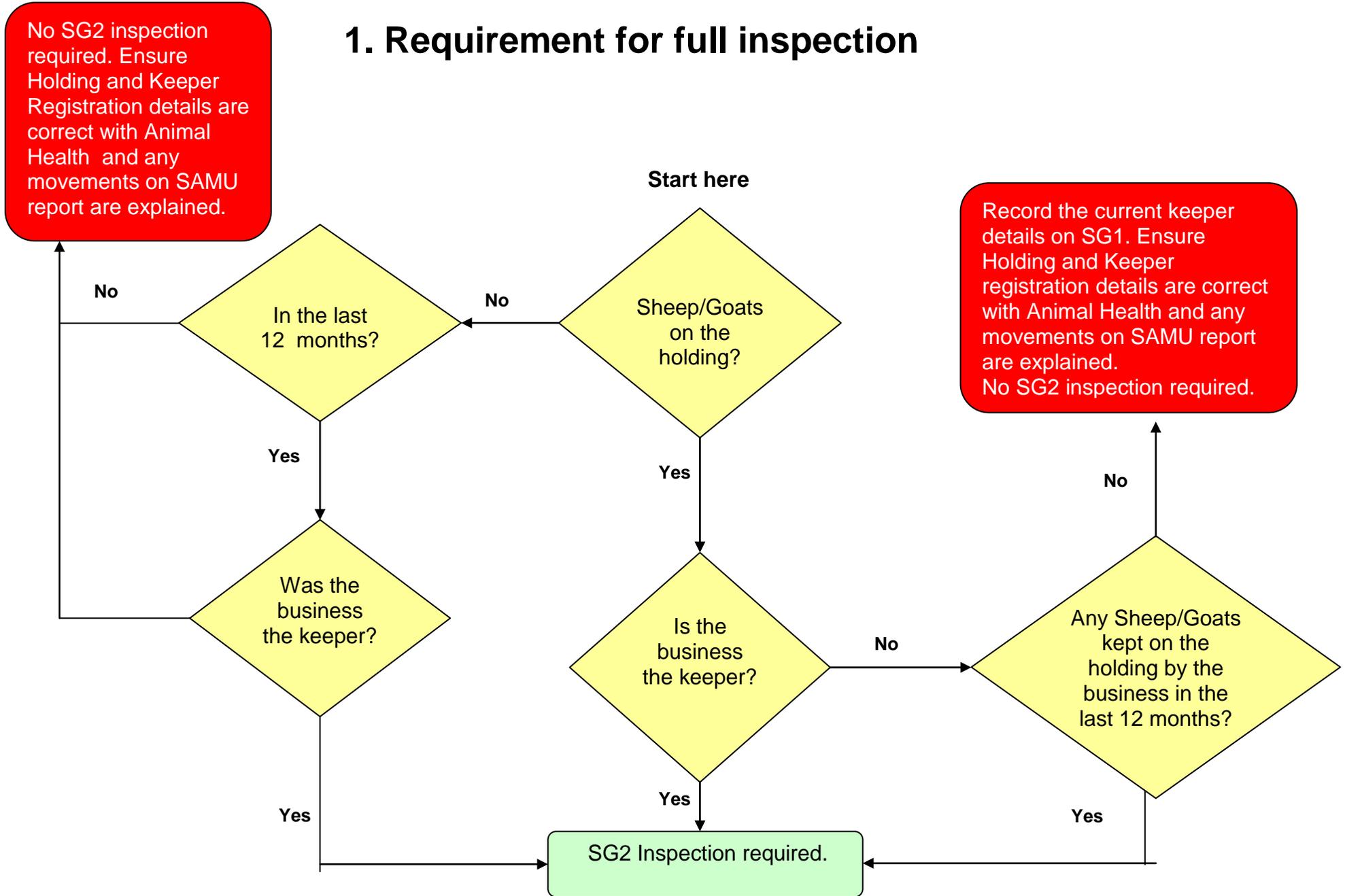
4.4 Cross compliance penalties letter (E795033)

If a sheep inspection results in a financial penalty, issue a cross compliance penalty letter. You should issue only one penalty letter. For first time negligent offences, the effects of multiple breaches are not cumulative; we will apply only one penalty. The level of penalty is dictated by the most serious breach discovered. If you have recorded intentional breaches, or breaches that are second or subsequent offences, contact AIT for advice on the penalty to apply.

4.5 Applying penalties

We apply cross compliance penalties at **business** level. We reduce (by a percentage) payments to the business in the calendar year in which the sheep inspection starts. We reduce all payments under the direct support schemes, including SFP and certain rural development support measures including LFASS. Issue a letter informing the keeper of the penalties that result from their sheep inspection. Be aware that the results of other inspections and checks may affect the keeper's final penalty. You can find details of how we apply penalties at part B of the cross compliance notes for guidance booklet.

1. Requirement for full inspection



2. Five Key Requirements.

Keeper registration

Section 2, 1.

Check holding and keeper are registered with Animal Health.



Confirm which holdings are used for sheep/ goats with keeper.



Where registration is incorrect update the Animal Health database



Take enforcement action

Notifying Moves to SAMU

Section 2, 3.

Compare the SAMU report(s) to records and farm documents.
Update as necessary.



Update report if necessary after findings of physical inspection are investigated.



Make a return to SAMU to update the database.



Take enforcement action.

Completion of Movement Documents

Section 2, 4.

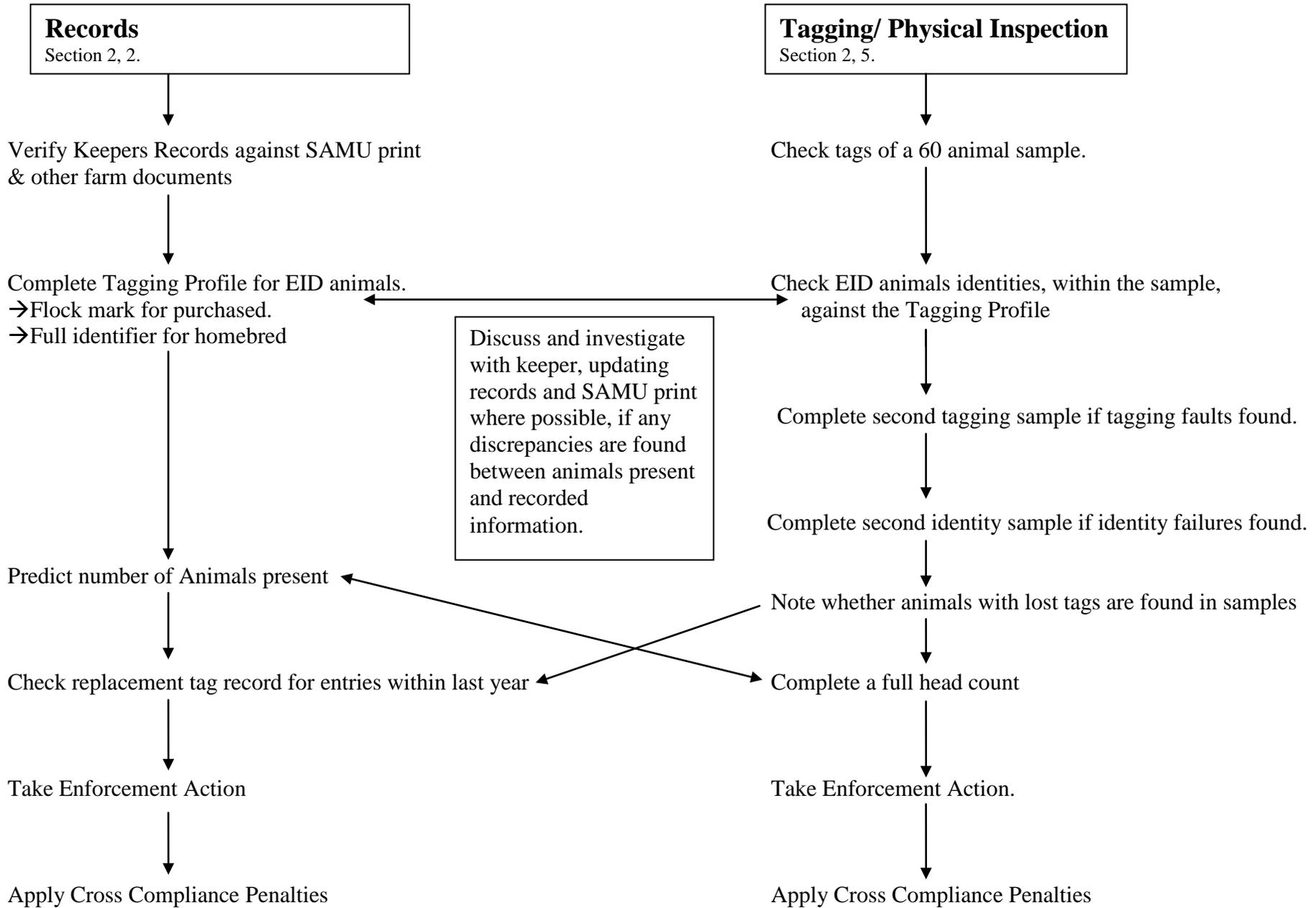
Compare movement documents details with SAMU report/keepers records and update as necessary



Check movement documents contain all mandatory information and record discrepancies on SAMU report



Take enforcement action.



3. Pre Inspection Preparation

3.1 You should carry a stock of the following forms that you may need on inspection:

- Keeper registration/removal of registration forms:
 - Main holdings (Objective E728045)
 - Seasonal holdings (Objective E728470)
 - Remove registration (Objective E728059)
- Blank secondary SG2 forms (Objective E1266711)
- Restriction calculation form (Objective E311555)
- SG3 (movement) restriction notice (Objective E311654)
- Inspection guidance (Objective E129406)
- Receipt book

Other documents that you can usefully refer to at inspection include:

- [Flock register](#)
- Movement Document Pad – 2011 issue
- Spare copies of [Keepers Guidance](#)
- Blank copy of the cross compliance penalty letter (Objective E1233177)
- Codes of recommendations for the welfare of sheep/goats

3.2 Preparing for an Inspection

Check the SAF form for gathering dates and try to schedule inspections to match.

- Print the inspection pack (SG1 & SG2)
- Complete the SG1. You will need to,
 - Complete keeper registration details using the spreadsheet from Animal Health (E1307063) and information from the Animal Health office for seasonal registrations.
 - Take all SAMU prints (section 3,1).
 - Obtain details of tag orders from sheep ETAS

Note any queries that need to be discussed with the producer.

- Establish whether the keeper has been selected for a 13 day check and/or separation check. You must be aware of any separation agreements that the keeper may have with SGRPID and take suitable bio-security precautions. An up to date list of keepers using separation agreements is maintained on Objective E375963 by area office staff.
- Establish the details of sheep inspections completed on the business in the preceding 3 years. The findings of any inspections may influence choice of enforcement action, you need to be aware of any previous cross compliance breach. Pre-printed information on the SG1 will help you identify previous inspections.

3.3 Notice

Inspections should be unannounced – up to three hours notice counts as unannounced. If your visit is announced, keep notice to the minimum necessary and only in very limited circumstances should it exceed 48 hours. The period of notice begins when you arrange a specific date and time to start the inspection. You must record reasons for any notice given on the inspection report.

You should expect the keeper to present the animals for inspection within 48 hours after the record check unless there are exceptional circumstances preventing this.

You should complete the inspection as quickly as possible. If it is conducted over a protracted period, you must comment and record your justification for the delay.

3.4 Contact

Initial contact with the keeper, whether by phone or in person, is an opportunity to get the inspection off to a positive start. Make sure the keeper understands why the inspection is being carried out, what is required and that it may take some time to complete. Explain that by doing the records first it is not necessary for them to be present all the time. Likewise, by doing the physical inspection following the record check, the keeper will have time to organise labour and equipment if needed. Should the keeper raise an animal welfare issue, please reassure them that you will take this into account during the inspection.

You should cover the following points during the initial contact:

- ensure that you are talking to the keeper or someone who is authorised to speak or act for the keeper and the business.
- the records and animals you need to inspect. If discussion reveals there are no sheep on the holding use the flowchart on page 6 to determine if an inspection is needed.
- the order the inspection will take (records then animals).
- the likely duration of the inspection.
- the need to have handling equipment and sufficient labour to complete the inspection safely.
- the locations of animals.
- Bio-security arrangements and whether animals will use a separation area covered by an agreement.

If discussion reveals that additional holdings will form part of the inspection, you will need to:

- obtain relevant SAMU reports for each holding (section 3,1);
- contact Animal Health to check registration information (section 2,1); and
- record the holding information on the SG1.

We are not operating counting groups for common grazings. You will be able to identify common grazings from the inspection list and your local knowledge. Contact the grazing clerk and decide gathering dates to allow you to organise the inspections. Normally, inspections involving common grazings should still be carried out unannounced. The period of notice will begin when you arrange a specific date and time with the individual keepers.

4. At the Farm

Before starting the inspection you need to confirm that you are speaking to the keeper or an authorised representative. You must check whether a separation agreement is presently in use. Bio-security practice needs to account for stock in isolation.

4.1 The keeper will need to provide for inspection:

- their records for the last 12 months;
- their movement documents for the last 12 months, including purchase invoices/market passes;
- all their sheep and goats;
- all unused ear tags;
- any supporting documentation you request or that the keeper suggests. This might include market invoices, diaries, calendars and so on.

4.2 Completing the SG1 with the keeper

Establish the holding(s) where stock are kept. If there are “surprise” holdings, add these to the SG1. and obtain SAMU report(s). If holdings are listed but not used for sheep or goats, explain on the SG1 why you will not include them in the inspection.

Establish what concessions are in use and for what holdings. Record this information on the SG1. Consider if it seems reasonable that the concession is being used.

Establish if the keeper has sole use of the holdings listed and identify any movements on the SAMU 2 location report that you do not need to verify. You should explain why movements are excluded from the inspection with comments on the SG1. Identify excluded movements (with comments) on the SAMU report(s).

4.3 Keeper registration

If the keeper was not registered at the holdings listed on the SG1 before inspection, discuss the requirements with him. Complete the relevant registration forms to pass to the local Animal Health Office after the inspection.

5. In the farm office

5.1 Decide how many SG2s to fill in (SG2, page 1)

If a business uses a single holding (or more than one but keeps records in a single register) record your findings on one SG2. If distinct sets of records are kept for each holding, fill in an SG2 for each holding. Secondary SG2's are completed only as far as page 6, the remaining pages record information relating to the business and this should be entered only on the SG2 for the main holding.

If an SG2 is used to record findings for more than one holding, you must record the other holdings for which records are checked or animals counted on page 1 of that SG2. Do not enter holding codes on this page if no checks were carried out.

The holdings listed on the SG1 should match those entered on the completed SG2(s). If necessary, enter comments to explain why a holding was not inspected.

5.2 Completing the tagging profile (SG2, page 2)

Fill in sections A and B of the tagging profile during the record checks. Scot EID information from the SAMU 3 location report may be used at the keepers discretion. You must record the use of 2011 'on' moves. Completing and using the tagging profile is described in detail at section 3,2.

5.3 Checking holding register requirements

5.3.1 Establish that the keeper has verifiable records (SG2, page 3, Q1)

If no records are presented record 'no verifiable records found'. A keepers records can include all information on farm documents or on a central computer database, including SAMU and ScotEID. This is a serious breach of ID and traceability legislation. Establish if the information can be obtained, discuss with your livestock co-ordinator and consider using a movement restriction.

5.3.2 Check the holding and keeper details (SG2, page 3, Q2)

For each holding used, there must be a record of the:

- CPH;
- address;
- type of production (for example, meat, wool or hobby); and
- name and address of the keeper.

If missing, ask the keeper to provide these details to update the register at inspection (minor updating). Record a 'yes' answer if details have been updated. Only record a 'no' answer if it is not possible to obtain the details. You would expect this only in exceptional circumstance which you must explain with comments.

5.3.3 Check that an identification record has been maintained (SG2, page 3, Q3)

From 31 December 2009, for all animals identified for the first time, the holding register must contain the:

- identification number of the animal (flock mark for slaughter animals or individual for breeding animals);
- year of birth;
- date of identification;
- breed and genotype (if known).

Where lambs are tagged as they leave the holding and the IDs are not in the movement record the Scot EID information on the SAMU 3 location report can help in updating the record.

We accept a single record entry for a batch of animals, for example, UK 0 24442 00127 – 00150.

The identification record or replacement tag record should contain details of all the tags used. From the pre-inspection ETAS check, you will know how many EID tags have been ordered. The keeper must present all unused tags. This will help indicate what to expect in the records.

Record a 'yes' answer if the record has been fully maintained. Record a 'no' answer if the information is not available from farm documents. Remember to reconsider this answer, if necessary, after your tag check at the physical inspection.

5.3.4 Check that a replacement tag record has been maintained (SG2, Page 3, Q3)

If a tag is replaced, there must be a record of:

- the date of replacement;
- the replacement tag/tattoo number; and
- the previous number, if known.

Record a 'yes' answer if the record appears to be fully maintained. Record a 'no' answer if the information is not available from farm documents. Remember to reconsider this answer, if necessary, after your tag check at the physical inspection.

Note whether there have been entries in the record within the last year, this will be used to decide whether we can accept the keeper has discovered the loss of any tags missing within the physical sample at inspection.

Animals with missing tags at the physical inspection should, where possible, have replacements fitted at inspection and you should update the replacement tag record before leaving the farm.

5.3.5 Check that a death record has been maintained (SG2, page 3, Q4)

For animals born after 31 December 2009, a record must be made of:

- the month and year of death of each animal; and
- each animal's full identity.

When answering question 4 you should only consider whether the requirements of SMR8, for animals born after 31 December 2009, have been met. It is not necessary to identify a dead animal to record its death; a description of the animal will suffice. Record a 'yes' answer if it appears that the requirements have been met. Record a 'no' answer if a record has not been kept or is obviously incomplete and the information is not available from farm documents. Remember to reconsider your answer, if necessary, after the head count at inspection.

By law, the keeper must maintain a record of deaths found at every inspection of their stock. This must include the full date and animal details. Animals that die before they are identified must be included. This is a requirement of SMR18, subject to inspection by Animal Health. If the keeper has failed to maintain a record of deaths, discuss with your livestock co-ordinator and pass a report to the local Animal Health office.

5.3.6 Check batch identity details are recorded (SG2, page 3, Q5)

From 31 December 2009, animals under a year old and intended for slaughter within twelve months of birth, can be identified with a single slaughter tag showing only the flock mark.

When moving batches of slaughter animals, the keeper must include the flock mark of the animals within the movement record. For mixed batches, the keeper must record the number of animals that share each flock mark. Example record:

10/01/10	Off	120	UK123456 (70 lambs) UK123457 (50 lambs)	11/112/8002	A haulier NL237YT
----------	-----	-----	--------------------------------------------	-------------	-------------------

Remember to note all flock marks of purchased animals in section A of the tagging profile. The accuracy and completeness of the information that you record at this stage will determine how likely it is that unexpected animal will be found at physical inspection. Where unexpected animals are found, the sample used at the physical inspection will require to be extended. If unexpected animals are found you would also have to return to the records/ farm documents after the physical inspection.

Record a 'yes' answer where flock marks appear to have been included in the relevant movement records or are present on the SAMU 3 location report, provided that the keeper elects to use the information for 2011 'on' movements, on the basis that they would receive a cross compliance penalty if they did not. Record a 'no' answer where details are not present, the information is not available from farm documents and it is clear that slaughter animals have moved. Identity information does not need to be recorded for internal business moves.

Remember to reconsider your answer, if necessary, after the identity check at the physical inspection.

5.3.7 Check individual identities are recorded (SG2, page 3, Q6)

For animals born or identified after 31 December 2009 and fitted with a pair of breeding tags, the keeper must record the animals' individual identification numbers each time they move. Identities need not be recorded for internal business moves. Example record:

10/01/10	Off	3	UK 0 123456 00224 UK 0 123457 00010 UK 0 123456 00210	11/112/8002	A haulier NL237YT
11/01/10	Off	56	UK 0 123456 00114-00170	11/111/8001 A Market	A haulier NL237YT

Animals born before 1st January 2010 do not need their individual IDs recorded even if they are electronically tagged.

Keepers can elect to use information from the SAMU 3 location report. The report may show the electronic identities of older sheep but these can be ignored.

Remember to note all flock marks of purchased animals in section A of the tagging profile. At this stage, identifying any animals on the holding with flock marks that do not appear in the records will help you avoid having to extend the identity sample at physical inspection. If you find unexpected animals you will also have to return to the records/farm documents after the physical inspection.

Record a 'yes' answer if identity details are available in the relevant movement records or from the SAMU 3 location print and the keeper elects to use the information for 2011 'on' movements, on the basis that they would receive a cross compliance penalty if they did not. Record a 'no' answer if details are not present, the information is not available from

farm documents and it is clear that batches with individual identifiers, born or identified after 31 December 2009 have moved. Remember to reconsider your answer, if necessary, after the identity check at physical inspection.

5.3.8 Check that movement records are maintained at holding level

(SG2, page 3, Q7)

The need to record movements applies at holding level. If the business uses more than one holding, not covered by a concession, movements between holdings must be recorded. The business must record movements on to and off the business using the actual CPHs the animals move from and to.

Record a 'N/A' answer if the business uses one holding or only holdings covered by concessions. Record a 'yes' answer if movements appear to have been recorded correctly. Record a 'no' answer if it is clear that movement records have not been maintained for each holding and the information is not available from farm documents.

Remember to reconsider your answer, if necessary, after comparing the animals expected and found at physical inspection. In particular, consider if records exist for each holding you counted animals on.

5.3.9 Check that the annual inventory figure is recorded (SG2, page 3, Q8 – 10)

The business must take an inventory of all the sheep/goats on each holding they use at 1 January each year, record the inventory figure(s) in the holding register, and return on a form supplied to DEFRA by 1 February. The figure(s) returned to DEFRA should match what is recorded in the holding register.

Question 9: Record a 'N/A' answer if the keeper did not have sheep or goats at 1 January and use a comment to explain. Record a 'yes' answer if the inventory figure is recorded or has been returned and is shown on the SG1- this information is held on a central computer database (AMLS) and can be used at the keepers discretion. Record a 'no' answer if the figure is not recorded or returned and the information is not available from farm documents.

Question 10: Record a 'N/A' answer if the business uses one holding. Record a 'yes' answer if separate inventory figures are recorded for each holding that was in use. Record a 'no' answer if the figure is not recorded for each holding and the information is not available from farm documents.

Question 11: Record a 'yes' answer if the figure populated on the SG1 for each holding matches the figure in the records. Record a 'no' answer if the figures do not match or no return was made.

5.3.10 Check unused ear tags (SG2, page 3, Q11)

Only approved ear tags ordered through the Ear Tag Allocation System (ETAS) can be applied as official identification. Check unused ear tags and confirm they are approved; these are embossed with the code PAS66. Ear tags not carrying this code should not be used as official identification. Advise the keeper not to use these tags and send a report to AIT detailing where and when the keeper purchased the tags. A keeper may choose to use any tag for management purposes but it must not contain the letters 'UK', show the flock mark, or be red or black. Advise the keeper if they are not storing the ear tags securely.

Record a 'N/A' answer if the keeper has no unused ear tags on the holding. If you intend sending a report to AIT detailing the use of unapproved tags or you have serious concerns

about safe storage, record a 'no' answer. This is a breach of cross compliance. Otherwise record a 'yes' answer.

5.4 Check the movement records and compare with the SAMU report(s)

Movement records must contain at least:

- the CPH or the address of the holding of destination/departure;
- the date of the movement; and
- the number of animals moved.

Movement records of animals leaving the holding must have the name of the transporter and their vehicle registration. Movements between holdings covered by a concession need not be recorded. All movements that need to be recorded must be notified to SAMU.

When moving animals born or identified after 31 December 2009, recording their individual identities in the movement record, or the flock mark for slaughter animals is mandatory. Where a mixed batch of slaughter animals move, the number of animals with each flock mark must be included in the record. It is the tags fitted to the animal that dictate the requirement of the movement record.

5.4.1 Compare the SAMU report(s) with the movement records

Check that:

- all movements on the SAMU report(s) are recorded in the holding register;
- all movements recorded in the holding register are on the SAMU report(s);
- all mandatory information is present in the movement records; and
- all movement details on the SAMU report agree with those in the holding register.

5.4.2 Investigate, update and correct movement details

5.4.2.1

If movements are shown on the SAMU report but not in the keeper's records:

- Check if the movement took place and if it was made by the inspected keeper.
- If the keeper made the movement, establish if the mandatory movement information is available from farm documents/ central computer databases.
- If the movement details are available, add the movement record to the register and record as minor updating in the comments box on page 4 of the SG2.
- If movement details are not available, record as a discrepancy in the table on page 4 of the SG2.
- If the keeper did not make the movement but the movement may have taken place, indicate on the SAMU report that the movement was not made by the inspected business but **do not** request an amendment on the report.
- If there is conclusive evidence that the movement did not take place, for example, if it is obviously a duplicate and no other keepers use the holding, request deletion from the SAMU report in your return, with an explanation.

Remember to reconsider, if necessary, after comparing the animals expected and counted at physical inspection.

5.4.2.2 If movements are shown in the keeper's records but not on the SAMU report, and provided these are not to concessionary locations that do not need to be recorded:

- Record the movement details on the SAMU report. If the movement took place within five days of the extract, record as a recent movement (code AR), otherwise record as an additional movement (code A).

- If you add movements 'on' to the holding to the SAMU report, answer 'yes' to the question on page 7 of the SG2.

Enter the number of SAMU reports to which you added movements in the boxes provided. Include all 'on' movements regardless of where the movement was from.

Remember to reconsider, if necessary, after comparing animals expected and counted at the physical inspection. Recalculate figures entered on page 9 of the SG2 if movements are added to the report because of the movement document check.

5.4.2.3 If mandatory movement details are missing from the records:

- Establish if the information is available from farm documents or the central computer databases.
- If the movement details are available, update the record and record as minor updating in the comments box on page 4 of the SG2. Invoices, movement documents or other sources, for example, a diary can be used to establish missing details.
- If movement details are not available, record as a discrepancy in the table on page 4 of the SG2.

5.4.2.4 If the movement details shown on the SAMU report differ from the keeper's records:

- Use farm documents to establish the correct movement details.
- Update the details on the SAMU report and/or in the keeper's records to ensure they are both correct.
- If you have amended the records, record minor updating in the comments box on page 4 of the SG2.

Remember to reconsider, if necessary, after comparing animals expected and counted at the physical inspection.

5.4.2.5 You may elect to advise the producer on future practice where minor updating has been carried out. Guidance should be recorded in the summary of inspection findings table that will pre-populate the inspection letter.

For 'on' moves from a market, the movement document will be a market pass / invoice.

5.5 Checking the movement documents

5.5.1 Compare movement document details with the holding register/verified SAMU report

Check the movement documents against the holding register/SAMU report for accuracy. Tick the MD seen box on the SAMS report when a match is found. Investigate and correct as appropriate where movement document information conflicts with the verified SAMU report/holding register.

If the holding register/SAMU report is corrected, record details of minor updating carried out in the comments box on page 4 of the SG2.

Remember to review information previously recorded where records are amended at this stage

5.5.2 Check each movement document for mandatory information

Tick the MD complete box on the SAMS report if all mandatory information is present. Where the movement document is missing or incorrect/incomplete indicate this on the SAMS report. Note that one list of animal identities on farm is sufficient to meet the requirements of the movement record and movement document. Only the identities of breeding animals (double tagged with individual number printed on the tag) are required on the movement document.

Do not record as incomplete or take enforcement action if the only anomalies you find are on market documents. Please report details of markets not meeting the required movement document standard on their invoices to the AIT mailbox (through your livestock co-ordinator).

5.5.3 Recording details of missing / incomplete / incorrect movement documents

Answer 'yes' to the question on page 7 of the SG2 where there are movement document faults recorded on the SAMS print. Enter the number of SAMS prints on which you have indicated movement document faults.

6. Completing the animal projection

6.1 Consider using the keeper's running total

If the keeper has a running total in his records and any changes made in the register have been carried through to the running total, we have now verified that this is correct. Check the arithmetic through the records for the inspection period. Enter the running total in the bottom line of the 'number of animals expected table' on page 5 of the SG2.

6.2 Complete the projection from the verified SAMU report

If you do not elect to use the running total, complete the projection as specified on the number of animals expected table, using the verified SAMU report. It is expected that the on/off figures entered will exactly match those on the verified SAMU report from the 1st January in the given year. The totals from each SAMU report should be added together where multiple reports relate to the inspection. The annual inventory should match the pre-printed entry on the SG1. In certain practical situations, you may wish to adjust the figures used, if you do so, you must comment explaining and justifying the use of alternative figures. The projection may either include figures for the entire business or for an individual holding and be compared to the count for the same. All elements of the projection and the count must always relate to the same entity.

6.3 Consider Birth and Death rates

Having completed the projection, consider the percentage birth and death rate you have recorded, using the annual inventory figure. If the birth rate seems particularly low, use comments to explain why this is the case and justify why Animal Welfare is not a concern. The birth rate will vary across farm type, 60% lambing would be expected on a hill farm. On a lowground farm, it could be between 100 and 200%, depending on breed of sheep and intensity of farming system. If the death rate is high, use comments to explain why this is the case and justify why Animal Welfare is not a concern. The average death rate across all farm types is 8%. If the death rate is particularly low, comments used to explain may also be helpful, particularly in the context of any explanation offered to justify accepting the difference between the number of animals expected and found.

7. Physical Inspection

You should postpone the physical inspection of animals if a disease outbreak is notified or suspected during the inspection.

The keeper must provide suitable handling facilities and assistance to allow you to inspect the animals. Please consider health and safety and animal welfare at all times during the physical inspection. If the facilities are inadequate, stop the inspection and give the keeper five days to provide suitable facilities.

7.1 Animals that are not the keeper's responsibility

You may find animals that are not the inspected keeper's responsibility. Establish who the responsible keeper is, record their details, and satisfy yourself that they are meeting the ID and traceability rules. You must consider:

- keeper registration;
- notification of moves to SAMU;
- tagging requirements; and
- animal welfare.

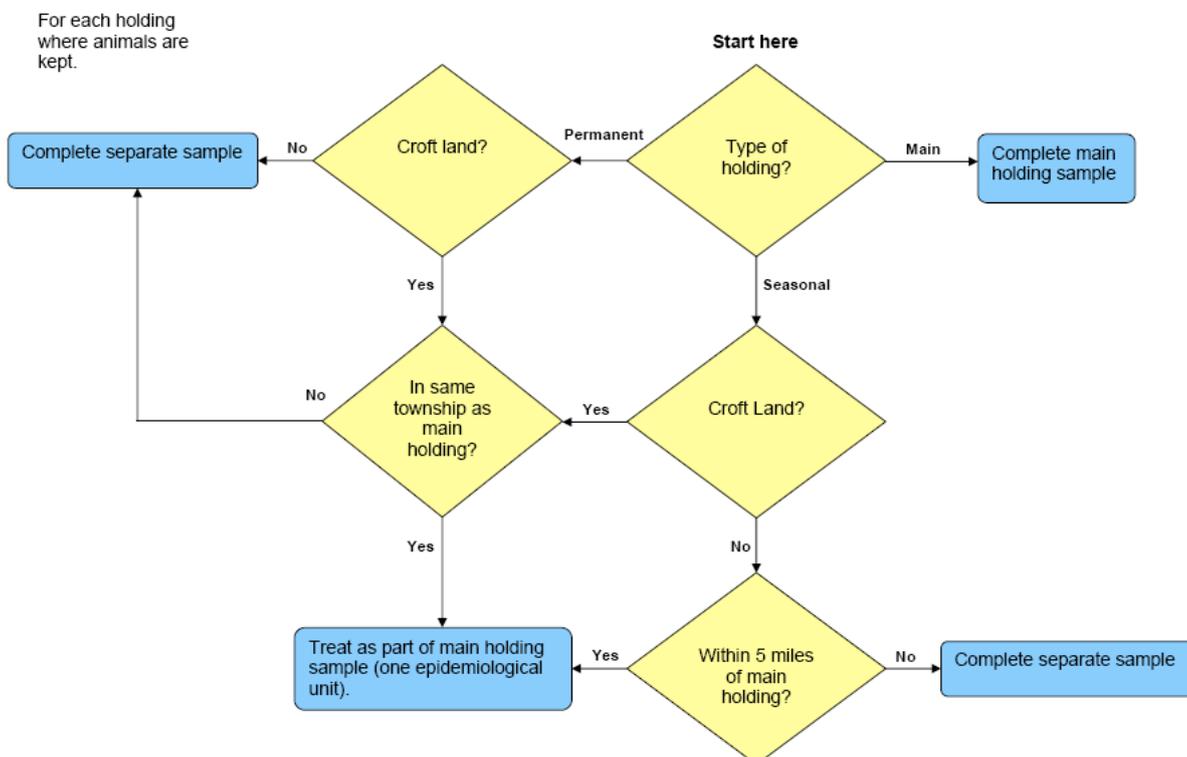
Take any action you deem necessary to satisfy yourself that ID and traceability requirements are being met. If you suspect problems, raise a manual inspection against the responsible keeper.

7.2 Physical inspections outside office area

We need to inspect all the sheep/goats the business owns regardless of their location. It is important that we inspect the entire flock/herd within a reasonable time and you may need to liaise with colleagues in other area offices to achieve this.

7.3 Ear tag and recorded identity check

You will need to do a 60 animal ear tag check on each holding not covered by a concession. If the keeper uses more than one holding use the flowchart below to determine how many separate samples you will need.



If a holding does not need a separate sample, include the count with the main holding's count when recording in the physical inspection table on page 6 of the SG2.

7.4 Selecting the sample

Your sample must represent the animals standing on the holding(s). If you expect EID animals at the physical inspection they must be represented within the sample. The sample should not include untagged animals which do not yet require a tag, unless less than 60 animals are tagged. Avoid selecting and handling animals where there may be a welfare problem. If untagged animals form part of the check you must satisfy yourself that the animals do not need to be tagged. Check all animals if there are less than 60 on the holding.

7.5 Examine each ear tag

When checking the sample(s) you should examine **each** ear tag to verify that animals are correctly identified. Check the identity of animals with EID identifiers against the information in sections A and B of the tagging profile. Record the flock marks found and enter them in section C. If you find an unexpected animal, record its full identity and enter in section D.

7.6 Sample failures

The 60 animal sample serves two purposes. If you find failures, the action you need to take differs:

1. **Tagging failures (see paras 7.7 and 7.8 below)**
2. **Identity failure (see para 7.10 below)**

7.7 Reasons for tagging failures

A sample will fail if you find any one of the sixty animals with an ear tag discrepancy (which is the keeper's fault). A discrepancy exists if the keeper has:

- purchased animals that have never been tagged or do not have the correct number and type (EID v conventional) of identifiers for the age of animal;
- homebred animals over 9 months old, born after July 2005, that have never been tagged;

- homebred animals over 12 months old, born after 18 January 2008, that have not been double tagged;
- sheep, born or identified after 31 December 2009, that have not been electronically identified;
- sheep with an unacceptable combination of electronic identifier types;
- animals over 12 months old, born or identified after 31 December 2009, that have a single identifier. At inspection all animals will be taken to have reached 12 months on 1 July in the year after they were born;
- failed to use red replacements, or tags identical to the original, when replacing missing tags in purchased animals;
- failed to use the flock mark allocated to the holding of birth when identifying animals, and the holding is not covered by a concession (Business Warning can be considered for first offence); or
- not replaced missing tags within 28 days, following the issue of a 28 day letter at inspection (intentional breach).

All tagging faults should be rectified, as far as possible, at inspection. Where it is not possible to have animals identified correctly on the day, the keeper must be required to have the animals correctly identified as part of the enforcement action taken. Follow up checks may be appropriate. Note that plastic slaughter tags can be used for slaughter animals in England and Wales, there is no fault if these tags are found. The tags show only the flock mark. There is a fault where tags, that were suitable for 2009 requirements have been used to identify animals in 2010. On 2009 tags, slaughter tags have a flock mark and an individual number and breeding tags do not have a zero in front of the flock mark.

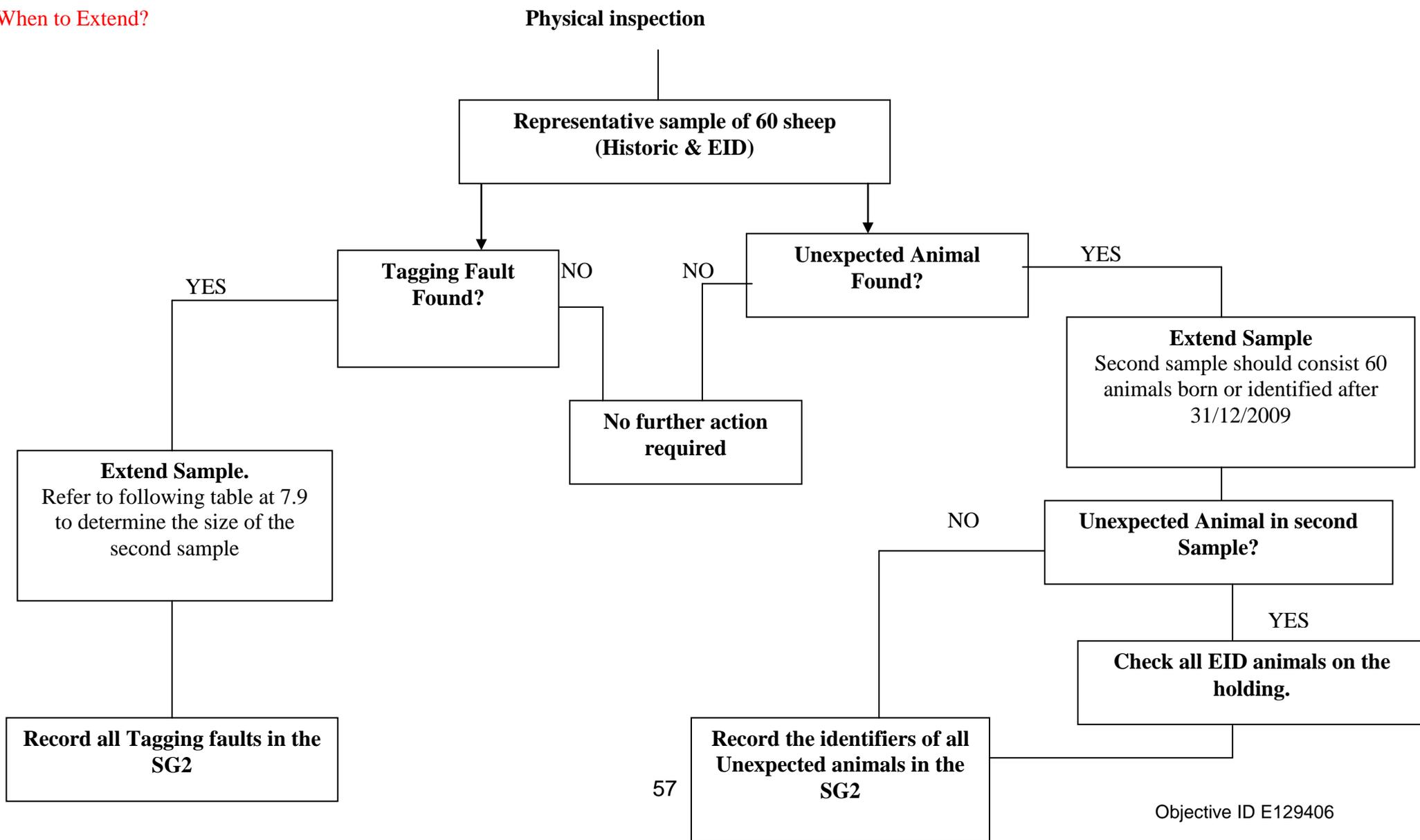
Where electronic tags are found not to read at inspection, replacements must be fitted and recorded. This is not a tagging fault, provided the animal is correctly identified.

7.8 Lost ear tags

Missing tags will not require an extended sample. Where there are lost tags within the sample(s) of animals answer 'yes' to the question on page 6 of the SG2. You will also need to answer the second question, to confirm whether or not there are entries in the replacement tag record within the last year. If there are lost tags at inspection and no record of replacements within the last year, this is a breach of cross compliance. We can not accept that the missing (lost) tags were discovered at inspection. The keeper has either failed to replace tags within 28 days of discovering the loss or has failed to record the replacement of tags.

Encourage the keeper to fit replacement tags at the time of the inspection and record the replacement in the holding register. Otherwise, instruct them to fit tags and record the use of replacements, within 28 days. Issue a 28 day tagging letter at the inspection, copies of which are produced with the inspection pack. Inform the keeper that we will carry out checks to ensure that they order tags. If they fail to do this within 28 days they will have intentionally breached the cross compliance requirement of the Single Farm Payment regime. An intentional breach could result in a 30% reduction in payments to them.

When to Extend?



7.9 Second sample size-Tagging

A failure in the first sample will require you to check a second sample for the holding with the failure. The size of the second sample depends on the number of animals that remain unchecked on the holding (a holding will be the epidemiological unit). Use the table below to find out how many animals need to be checked. Record sample size and any faults found in Sample 2, Table 1 (page 6 of the SG2).

2 nd Sample Table					
Size of flock/herd remaining	Sample Required	Size of flock/herd remaining	Sample Required	Size of flock/herd remaining	Sample Required
61 – 515	All	951 – 1000	710	1901 – 2000	1100
516 – 550	515	1001 – 1100	745	2001 – 3000	1270
551 – 600	530	1101 – 1200	785	3001 – 4000	1445
601 – 650	545	1201 – 1300	825	4001 – 5000	1625
651 – 700	560	1301 – 1400	865	5001 – 6000	1685
701 – 750	575	1401 – 1500	900	6001 – 7000	1750
751 – 800	600	1501 – 1600	940	7001 – 8000	1810
801 – 850	630	1601 – 1700	980	8001 – 9000	1875
851 – 900	655	1701 – 1800	1020	9001 – 10000	1950
901 – 950	680	1801 – 1900	1060	>10000	2300

7.10 Reasons for identity failures

When inspecting the sixty animal sample, if you find a flock mark, or individual number on the tag of an electronically identified home bred animal, that you did not expect, record the full identity as an unexpected animal in section D of the tagging profile.

7.11 Second sample size – identity

If you find a failure in the first sample you will need to check a second sample from the holding with the failure. The second sample should be 60 electronically identified animals. If you find a failure in the second sample you will need a third sample, comprising all electronically identified animals on that holding. You need not include unidentified or conventionally identified animals in the second and third samples. If the number of EID animals present restricts extending the sample, record the number of animals checked and add comments to explain. Record the number of animals checked and the number of failures found in sample 2, table 2 on page 6 of the SG2. You should update Section C of the tagging profile with further flock marks found. Record the full identification number of any more unexpected animals in section D.

7.12 Headcount of animals

Count all the animals present on each holding and record in the physical inspection table on page 6 of the SG2. Include the count of animals on concessionary locations with the count for the main farm code in the table.

8. Compare the findings of the physical inspection with the recorded information

Accurate records will reflect the number and identities of animals present on the farm.

8.1 Consider the implications

One of the aims of a sheep inspection is to confirm that the keeper has maintained accurate records. If accurate records have been maintained, the number of animals expected and found should be within 5%, provided the keeper has had a reasonable gather. Unexpected animals should not be present.

If unexpected animals are present or the numbers expected and found differ substantially, there are a number of possible causes:

- entire movements have not been reported/recorded;
- required movement details (individual numbers, flockmarks or batch within batch details) have not been entered in the records;
- movement details have been recorded incorrectly;
- record keeping requirements (identification record, record of deaths, replacement tagging record) have not been complied with in part or in full;
- there could be an underlying animal welfare problem.

8.2 Discuss and investigate with the keeper

When an unexpected animal or a difference between the number of animals expected and present is found, this should always be discussed with the keeper and investigated to establish whether the actual record keeping discrepancy can be identified/ rectified. Where the keeper expects that a poor gather is the reason for the difference found, he should be asked to back gather if possible or gather again, sheep may have to be marked to allow this to take place.

8.3 Record findings of investigation

If there have been movements during the inspection, these should be recorded in the register and on the SAMS report. If you discover additional movements, or inaccurate or incomplete movement records, record these as discrepancies or as minor updating in the SG2 and amend the SAMS report/records where necessary. If you amend the SG2 at this stage, please remember to review earlier entries. The report must be consistent throughout. You can explain changes made following investigation in the comments box on page 5 of the SG2.

8.4 Investigating unexpected animals

Guidance in section 3, 2 covers using the tagging profile. Record the outcome of your investigation on the tagging profile.

8.5 Complete the SG2 if you consider the difference between numbers counted and expected is reasonable

Complete the SG2, page 5 by stating whether the Number of animals expected and found has been accepted as verification that the keeper has maintained accurate records.

Where a Yes answer is given the inspector should use the comments box below to explain and justify why any difference has been accepted as reasonable.

If an actual fault has been identified, for example unreported movements or a discrepancy involving the number of animals in the annual inventory declaration, explain how this has affected the number of animals expected and provide a revised figure. The revision may account for the difference or partly explain the difference. Further comments are necessary to explain any remaining difference. Take action to address the fault and record details as appropriate in the SG2.

In some cases, the differences found on individual holdings within a business may be beyond the scope of reasonable explanation but the sum of the number of animals expected and found for the business as a whole acceptable. In such circumstance, provided that failure to record movement details between business holdings is addressed as part of the inspection, the decision on whether to accept the difference can be based upon business information. Make clear in your comments that business information has been considered.

The decision on whether a difference between the number of animals expected and found can be accepted is a matter for professional judgement of inspectors. This allows us to use the on farm knowledge that only the person carrying out the inspection could have and the local knowledge that is available in Area Office to cover variances between farm types and across different areas of the country. The table below provides a rough guide to the percentage differences and how often we would expect inspections finding that level of difference to result in a cross compliance penalty- assuming that the actual fault, for example, an unreported/unrecorded move can not be identified. Percentage differences are not a suitable way to consider differences in flocks with only a few sheep.

Percentage Difference	How often would this be expected to result in a cross compliance penalty?
Less than 5%	Occasionally
5 to 10%	More often than not
10 to 15%	Frequently
15 to 20%	Almost always
More than 20%	Always

Where a No answer is given, and there is no reasonable explanation for the difference between number of animals expected and found, provide full details in the comments box and record a breach of SMR8 on page 8 of the SG2. Accurate records should reflect the number of animals on the ground.

8.6 Consider Animal Welfare problems or the issue of a movement restriction

Complete the questions at the foot of page 5, in consultation with your line manager/ livestock co-ordinator where you are considering action. Answer 'yes' to both questions if there are no problems. If there is evidence that could suggest animal welfare problems for example, high death rates, low birth rates or the presence of disease or general condition of the animals concern you, tick 'no' and file a report with the DVM.

If animals are displaying symptoms (section 2,7.2) that could be sheep scab inform your local Animal Health office by e-mail, copying to file. Note that the presence of suspected sheep scab in itself does not necessarily mean that an Animal Welfare problem exists. Answer the question 'no', only if you intend to file a report detailing evidence of animal welfare problem.

If you intend to issue a movement restriction (section 3,3.6) answer the question as 'no' on page 5 of the SG2.

9. Concluding the Inspection on Farm

9.1 Completing the remaining sections of the SG2

Enter details of compliance with the requirements of keeper registration (section 2,1) at the top of page 7 of the SG2.

Enter details of 'on' movements, regardless of who should have reported the moves, added to the SAMU report on page 7 of the SG2.

Enter details of movement document faults, where the keeper has not retained or correctly completed the documents on page 7 of the SG2.

Decide what level of enforcement action is to be taken where problems were found. Refer to section 2 and 3,3 for guidance on the use of enforcement tools. Record the action taken on page 7 of the SG2. Issue guidance or record the issue of a verbal warning in the table on page 9 of the SG2. This table will populate the inspection results letter.

Complete page 8 with details of any breaches of cross compliance. Refer to section 2 and 3,4 for guidance on the application of cross compliance penalties. Throughout the SG2, indication is given where recording a fault will lead to the application of cross compliance penalties. In 2011, cross compliance penalties should be recorded and a letter issued at conclusion of inspection. If it later becomes necessary to penalise for incomplete CCP information, affected businesses will be informed under separate cover. This is explained on the cross compliance penalties letter you issue.

Complete the summary of inspection findings table on page 9 of the SG2. Where there were no findings of non-compliance populate the tick box at the bottom of the page and do not enter comments under the headings. Where findings of non-compliance have been made, complete the box(es) for the relevant requirement. Guidance on the appropriate information to include is given in paragraph 9.4 below.

9.2 Reviewing the completed inspection report

The information in the report must be consistent throughout. The report includes the SG1, the SG2, ETAS report(s), SAMU report(s) and any other documents that form part of the record. If you included additional information or made amendments late in the inspection, you must reconsider information recorded earlier.

Provide a full picture of any problems you found. Write the report so that any person with a reasonable knowledge of the industry and inspection procedures would be able to determine what was found, what action was taken and what follow up action is necessary. All follow up action taken must be documented on file when this takes place.

9.3 Signing and updating the holding register

Confirm with the keeper that they have presented all their records. Each holding's register must show the name and signature of the competent authority's representative who checked the register, and the date he checked it. An entry should be made in the records to accurately reflect the number of animals on the ground at the end of the inspection. This can be a simple count total. If the register is computerised, sign a printed copy (covering the inspection period) and leave this with the keeper. If there are discrepancies, sign two copies, leaving one with the keeper. Sign any paper documents used by the keeper to back-up the electronic records. The signature that you leave on any document

will normally take the form of 'seen by SGRPID inspector U number, name, date'. When signing the holding register, you would also record the count of animals at inspection.

9.4 Discussing the completed report with the keeper

Present the inspection findings to the keeper. You must explain and discuss your findings with the keeper. If there have been any misunderstandings you can resolve these at this stage and update the report. Invite the keeper to view the entire inspection report if he wishes to, but the summary of inspection findings table would be a good base for discussion. This discussion should cover:

- **The problems found** – explain each requirement and the follow up action the keeper and/or the inspector needs to take, to sort the problem. The inspection results letter contains the inspection findings table and provides a summary for the keeper.
- **Enforcement action** – state what action we are taking and explain the form it will take. We will act on every problem we find at inspection. If this entails guidance, it will be part of the inspection results letter. If the keeper is to receive a verbal or written warning you should make this clear to him.
- **Cross compliance sanctions** – these apply if you found problems with the record keeping or tagging elements of the inspection. We will only apply one sanction as a result of the inspection. This will be dictated by the most serious breach. We must also consider repetition. You can inform the keeper of the sanction that we will apply as a result of the sheep inspection but **you can not inform the keeper of the final sanction to his single farm payment because other checks or inspections may affect this.** As a result of a sheep inspection, we will either:
 - issue a business warning letter; or
 - issue a cross compliance penalties letter.Section 3, 4 provides information on cross compliance penalties.
- If you wish to discuss with your co-ordinator or seek advice from CSD about the appropriate action required for a particular issue identified, make this clear to the keeper. State the issue and when/how you will supply the information to them.
- If you will take any action beyond the scope of the sheep inspection, for example, reporting an Animal Welfare concern, explain this and make sure that they understand the likely consequence of your actions.

9.5 Making inspector's comments and offering the keeper opportunity to comment

The summary of inspection findings table on page 9 of the SG2 written for issue by letter will be the first point of reference for anyone viewing the inspection. The inspectors comments may start with a brief summary statement of the findings.

Any information relevant to findings not recorded elsewhere in report must be included, for example:

- tagging errors or other faults that were not attributed to the inspected business;
- the fact that tagging faults were corrected or replacement tags fitted and recorded at inspection;
- the presence of symptoms typical of sheep scab that will be notified to the Animal Health Office

Background information that may help the reader in interpretation of the report can also be included.

Keepers should be given the chance to make any comment they wish when you ask them to sign the report. The keeper may have a copy of the report, if they wish. You will send them an inspection findings letter as standard – it has the summary of inspection findings

table on it. You may also issue further letters to advise of any financial penalty resulting from the sheep inspection. This may not be the final penalty we apply to his single farm payment as other checks and inspections may affect this.

9.5.1 Declaration of elective use of CCP information

Where CCP information is present as part of the movement record(s) but is not 100% complete for 2010 or for 'off' movements in 2011, this can be accepted. Identity information in 'on' movement records from 1st January 2011 must be 100% complete or movement details need to be recorded as described below.

At the conclusion of the inspection there are three possibilities regarding the identity information required in the movement records:-

1. It is all present, complete and correct

There are lists of individual identities for breeding animals and the flock mark or number of animals with each flock mark for slaughter animals as part of the movement record. In this case, tick the declaration stating that the keeper does not wish to use CCP information. Note that if the keeper presents CCP information for 'on' movements on farm and it is not complete or supplemented by their records to the point of 100% complete, you can not use this option. The flock marks on market invoices can be used to update movement records for slaughter animals, provided that these are the flock marks of the animals moved. Most market invoices will show the flock mark allocated to the main holding of the vendor on the market back office system. These may or may not be the flock marks of the animals moved – that can be verified against the ScotEID information on the 3 location report.

2. There is a Medium severity cross compliance penalty for failure to maintain correct records

In this case, tick the declaration stating that the keeper does not wish to use CCP information before asking them to sign the report. Use of this information would not affect the penalty applied in any case. You can note in the comments for the breach screen, describing all the breaches found, that the ScotEID information was used as part of the movement records and this may have been incomplete.

3. Unless the keeper used the ScotEID information from the SAMU 3 location report for 'on' moves in 2011, a cross compliance penalty would apply or a cross compliance penalty of low or very low severity applies for failure to maintain correct records.

In this case, advise the keeper to use the information from ScotEID (SAMU 3 location) and if they agree, tick the elect to use box on the declaration before they sign the report form. Complete the details of moves as directed – remembering that only non-EID animals included in the same lot need to be detailed. There may be non-EID animals that were involved in the same movement but sold/bought in different lots. Advise the keeper that the position regarding application of cross compliance penalties for identity information in 'on' moves that is incomplete is not clear – there may or may not be a penalty applied, if so, they will be informed under separate cover and will have the opportunity to appeal at that time.

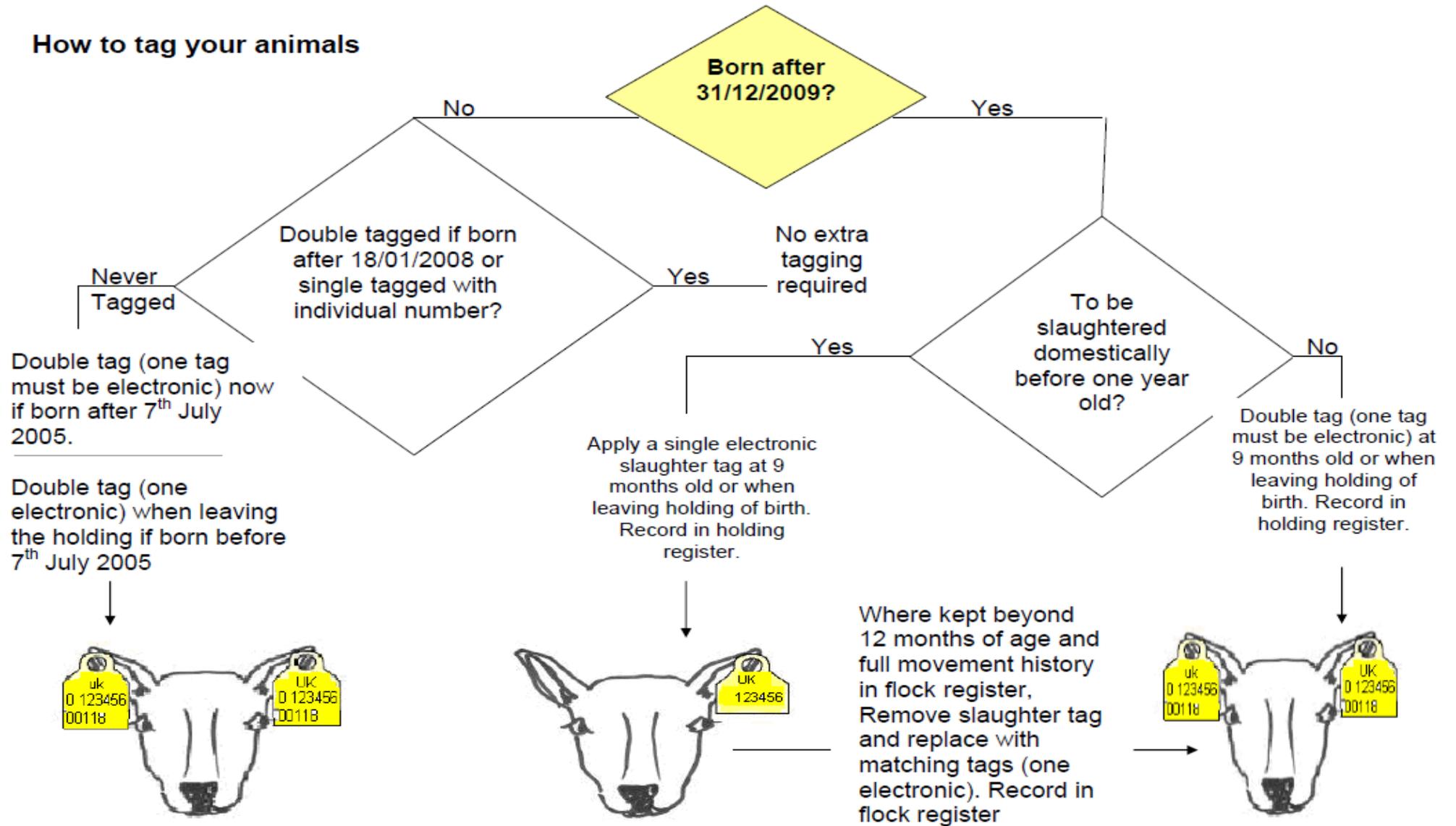
If the keeper refuses to use this information, tick the declaration box stating that before they sign the report. Make sure they are clear that this will result in a cross compliance penalty whereas there may not be one if they did use the information. The penalty applied will be for an incomplete movement record – the level will depend on the number of records that are incomplete. Movement details require to be recorded within 48 hours. Moves that have taken place around the inspection or movements corrected on the SAMU

report, for example, the addition of another lot to a market move may have identity information available on ScotEID. If so, this will be available on a 3 location report requested after the corrections have been made at SAMU. Note that markets / abattoirs do not hold an information store of identities beyond ScotEID which is available on the 3 location report, keepers may be able to obtain information from the departure location / destination location of the animals moved, if so, they can supply this to be considered at the PAO's discretion or as part of an appeal. The inspection must be processed in the first instance using the information available at that time.

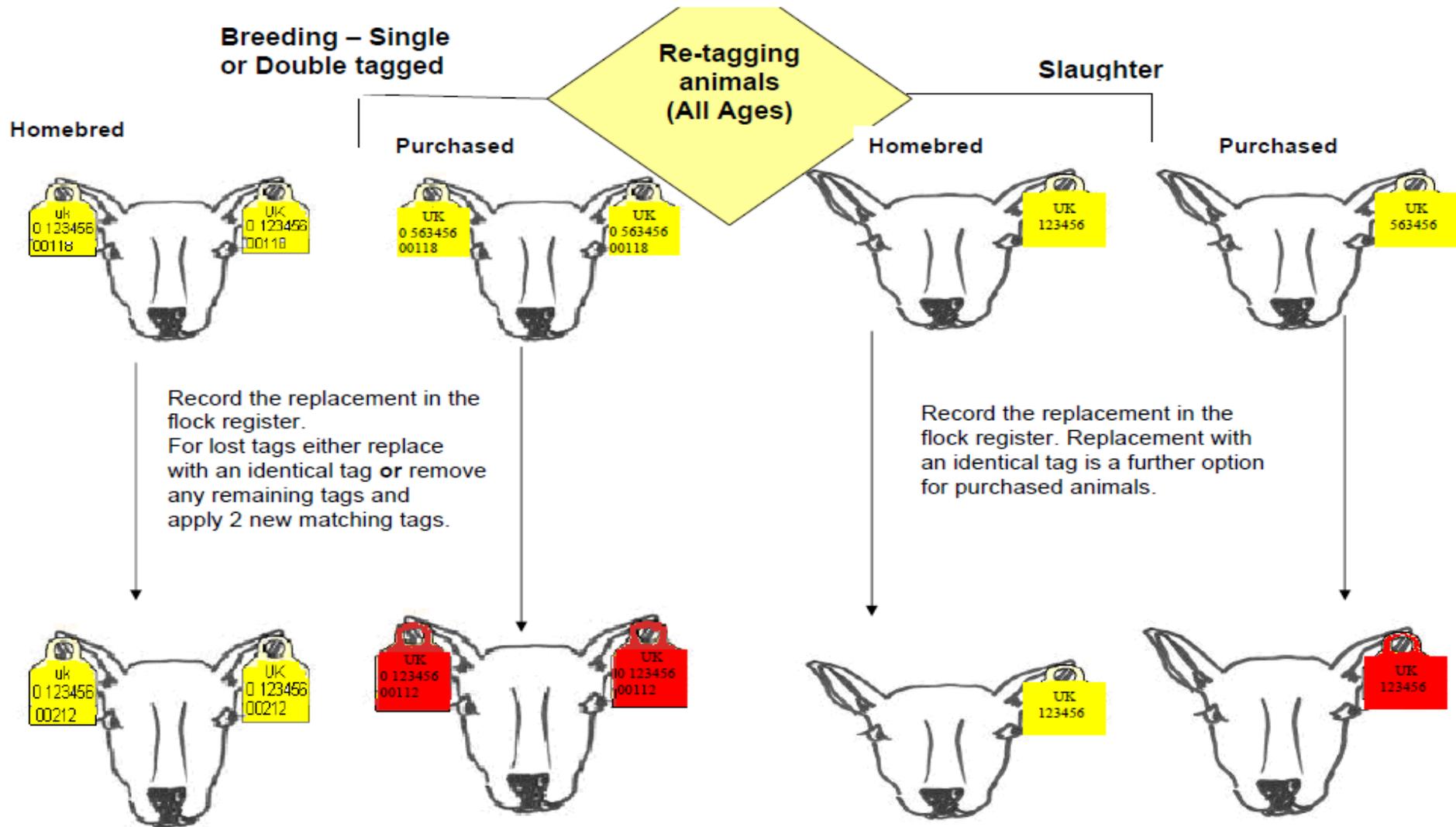
9.6 Completing and documenting the file with all follow up action

The post inspection checklist at Appendix 6 is a memory aid to keep on file. Certain inspections may need additional follow up action.

How to tag your animals



Replacement tagging- Tags must be replaced within 28 days of discovering the loss.



2010 Movement Document

Scottish Animal Movement Unit (SAMU)
161 Brooms Road, Dumfries, DG1 3ES

Tel: 0845 601 7597 Fax: 01387 274457
email: samu@scotland.gsi.gov.uk



Sheep and Goat Movement Document

DEPARTURE LOCATION – All grey fields must be completed

DEPARTURE CPH

ADDRESS OF KEEPER

DEPARTURE DATE Date of Loading (if different)

Time First Animal Loaded Time of Departure

VEHICLE REGISTRATION NAME OF DRIVER

HAULAGE COMPANY PERMIT NUMBER

NUMBER BEING MOVED

SHEEP	GOATS
<input type="text"/>	<input type="text"/>

DESTINATION CPH

I declare that the above details are correct.

KEEPER'S SIGNATURE PRINT NAME

CONTACT PHONE NUMBER

RECEIVING LOCATION – All grey fields must be completed

ARRIVAL DATE Date of Unloading (if different)

NUMBER RECEIVED Time Last Animal Unloaded

SHEEP	GOATS
<input type="text"/>	<input type="text"/>

I declare that the above details are correct / as amended (delete as appropriate)

KEEPER'S SIGNATURE PRINT NAME

CONTACT PHONE NUMBER

- Receiving keepers or exporters located in Scotland should send white copy to SAMU within 3 days of the movement taking place.
- Receiving keepers located out with Scotland should send white copy to their Local Authority within 3 days of the movement taking place.

No. 1234567

2011 Movement Document (issued May 2011)

sheep pads BLACK inner_Layout 1 02/03/2011 12:08 Page 1

Scottish Animal Movement Unit (SAMU)
161 Brooms Road, Dumfries, DG1 3ES

Tel: 0845 601 7597 Fax: 01387 274457
email: samu@scotland.gsi.gov.uk



Sheep and Goat Movement Document

Section 1: To be completed by keeper moving animals off

DEPARTURE CPH _____ / _____ / _____

NUMBER MOVED

SHEEP	GOATS
-------	-------

DEPARTURE DATE ____ / ____ / ____ Date of Loading (if different) ____ / ____ / ____

DESTINATION CPH _____ / _____ / _____

Time First Animal Loaded _____ Name of Driver _____

Time of Departure _____ Vehicle Registration _____

Permit Number _____ Haulage Company _____

Animal Identification Details: To be completed by keeper moving animals off

Where applicable (see pad cover), please list identities in the box below, supply an attached list including the reference number of this SAMU document and departure CPH, or indicate how identities will be supplied.

To be provided by CCP to the ScotEID database I have uploaded to the ScotEID database

--

Food Chain Information (FCI) - to be completed by keeper moving animals off - tick one box only

Slaughter animals - All animals in consignment satisfy FCI statements on reverse.

Store or breeding animals - All animals in consignment satisfy FCI statements on reverse.

OR

The FCI statements are not satisfied for all animals in the consignment and the additional information described on the reverse is supplied.

Food Chain Information is not relevant for this movement. E.g. moves within business or to shows.

I declare that the above details are correct.

KEEPER'S SIGNATURE _____ PRINT NAME _____

ADDRESS OF KEEPER _____

CONTACT PHONE NUMBER _____

Section 2: To be completed by keeper receiving animals

ARRIVAL DATE ____ / ____ / ____

NUMBER RECEIVED

SHEEP	GOATS
-------	-------

Date of Unloading (if different) ____ / ____ / ____ Time last animal unloaded _____

I declare that the details in Section 2 are correct

KEEPER'S SIGNATURE _____ PRINT NAME _____

CONTACT PHONE NUMBER _____ No.

Requirement: Identification	Extent [Impact limited / not limited to an on-farm effect]	Severity [Very Low, Low, Medium or High]	Permanence [Rectifiable or Permanent]	Reduction for First Time Negligent offence
Animals have not been tagged or have been incorrectly tagged before leaving a holding or reaching the appropriate age	<p>On farm effect: where the animals that have never been tagged or are incorrectly tagged are still on the holding</p> <p>Off farm effect: where there is evidence that animals that have never been tagged or are incorrectly tagged have moved off of the holding</p>	<p>Low: Less than 5 animals.</p> <p>Medium: 5 or more animals or between 10% and 20% of the animals sampled.</p> <p>High: More than 20% of the animals sampled.</p>	Permanent	<p>Low: 3%</p> <p>Medium: 3%</p> <p>High: 5%</p>

**Inspector's note: The severity will normally be dictated by the number of non-compliant animals, illustration of severity:
Where 5 animals are non-compliant in a flock of 20 this will result in HIGH severity. More than 20% of the animals are non-compliant.**

Requirement: Replacement of Identification	Extent [Impact limited / not limited to an on-farm effect]	Severity [Very Low, Low, Medium or High]	Permanence [Rectifiable or Permanent]	Reduction for First Time Negligent offence
The keeper has not recorded the replacement of identification within 48 hours.	<p>On farm effect: where the animals are still on the holding</p> <p>Off farm effect: where there is evidence that the animals have moved off the holding.</p>	<p>Very Low: Failure to make entries in the replacement identification record. The information is not available from farm documents.</p> <p>Medium: No replacement identification record has been kept. The information is not available from farm documents.</p>	Permanent	<p>Very Low: 1%</p> <p>Medium: 3%</p>
<p>The keeper has not replaced lost identification within 28 days and/ or the record of replacements has not been maintained.</p> <p>Inspector's note: This breach would be applied as a result of the findings of the physical inspection.</p>	On farm effect	<p>Medium: Animals with missing identification are present at inspection. There are no entries in the record of replacements within the last year.</p>	Permanent	3%
Animals with lost or illegible identification that has not been replaced within 28 days	On farm effect	<p>Medium: Keeper has failed to comply with a request, issued at inspection, requiring that they order and fit tags within 28 days.</p>	Permanent	This would be considered as an intentional breach.
Ear tags have been removed or replaced without the permission of the Scottish Government.	<p>On farm effect: where the animals are still on the holding</p> <p>Off farm effect: where there is evidence the animals have moved off the holding</p>	<p>High: any animal is found to have had official ear tags removed or replaced, without permission.</p>	Permanent	5%

Requirement: Record Keeping	Extent [Impact limited / not limited to an on-farm effect]	Severity [Very low, Low, Medium or High]	Permanence [Rectifiable or Permanent]	Reduction for First Time Negligent offence
Inspector's Note: Breach applies only where the information is not available from farm documents or a central computer database.				
Failure to keep records or failure to provide the records for inspection.	<p>On farm effect: evidence suggests no animal movements have taken place.</p> <p>Off farm effect: animal movements may have taken place</p>	High- no verifiable records	Permanent	5%
Failure to record movement details within 48 hours.	<p>On farm effect: where the missing information relates to animals moved on to the holding</p> <p>Off farm effect: where the missing information relates to animals that have moved off the holding</p>	<p>Very Low: Less than 5 movement records do not have all the required information.</p> <p>Low: 5 to 10 movement records do not have all the required information.</p> <p>Medium: 11 or more movement records do not have all the required information.</p> <p>Medium: Less than 5 movements are not recorded.</p> <p>High: 5 or more movements are not recorded.</p>	Permanent	<p>On farm, Very Low 1%</p> <p>High: 5%</p> <p>Other categorizations: 3%</p>
The keeper has not updated the identification record within 48 hours. (Inspector's note: Applies only to animals born or identified for the first time after 31/12/2009)	On farm effect	<p>Very Low: Failure to make entries in the identification record.</p> <p>Medium: No identification record has been kept.</p>	Permanent	<p>Very Low: 1%</p> <p>Medium: 3%</p>

<p>The keeper has not recorded the month and year of death of an animal within 48 hours. (Inspector's note: Applies only to animals born or identified for the first time after 31/12/2009)</p>	<p>On farm effect: in locations covered by the remote areas derogation. Off farm effect: in all other locations</p>	<p>Very Low: Failure to make entries of death details. Medium: No death record has been kept.</p>	<p>Permanent</p>	<p>On farm, Very Low: 1% Others: 3%</p>
<p>Annual inventory as at 1st January not recorded by 1st February</p>	<p>On farm effect</p>	<p>Very Low: The annual inventory has not been recorded, by 1st February and no return has been received.</p>	<p>Permanent</p>	<p>1%</p>
<p>Inspector's note, the following breaches of the requirements of record keeping would be applied as a result of the findings of the physical inspection.</p>				
<p>Records are not accurate- do not predict the number of animals present. The difference found is beyond the scope of reasonable explanation. The actual record keeping fault can not be identified.</p>	<p>On farm effect: evidence suggests difference has not involved live animal movements. Off farm effect: animal movements may have contributed to the difference found.</p>	<p>The difference between the number of animals expected, from the records, and counted at inspection is, Low: less than 10% of the flock. Medium: between 10% and 40% of the flock High: more than 40% of the flock</p>	<p>Permanent</p>	<p>Low/ Medium 3% High 5%</p>
<p>Individual identities of home bred animals, present on the holding, are not in the records. The identification or replacement tag record have not been maintained.</p>	<p>On farm effect</p>	<p>Very Low: less than 10% of the animals whose identities are checked are not present in the records. Medium: 10% or more of the animals whose identities are checked are not present in the records.</p>	<p>Permanent</p>	<p>Very Low: 1% Medium: 3%</p>
<p>Flock marks of purchased animals, present on the holding, are not in the records. Movements have not been recorded or records of movements are incomplete.</p>	<p>On farm effect</p>	<p>Medium: less than 5 flock marks of animals whose identities are checked are not present in the records. High: 5 or more flock marks of animals whose identities are checked are not present in the records.</p>	<p>Permanent</p>	<p>Medium 3% High 5%</p>

Post Inspection Checklist 2011**For All Inspections-**

- File inspection report and all documents including letters relating to inspection
- Data capture findings onto SIACS. (XC breaches via inspection program)
- Send the inspection results letter.

Where necessary- **Make a return to SAMU**

If changes to the database are required. Guidance is available at Objective ID E309166.

 Provide keeper registration forms to Animal Health.

(main holding E728045, seasonal holdings E728470, remove registration E728059)

 Check ETAS/ remind producer within 28 days.

If tags could not be replaced at inspection and 28 day letter was issued.

 Issue written warning. (E285792)

Retain a copy on file. Include record of guidance or verbal warnings in table page 9 of SG2.

 Serve movement restriction. (E311654)

Where 'live' discrepancies (uncorrected at end of inspection) are above 20% or where access to allow inspection is denied. Retain a copy on file.

 Issue letter advising keeper of cross compliance penalties. (E1233177)

Retain copy of issued letter on file.

 Send report to DVM if there are animal welfare issues.

Problems should be discussed with line manager/ livestock co-ordinator/ PAO.

 Report suspicion of sheep scab to Animal Health

Where there were sheep exhibiting symptoms that could be sheep scab, on inspected farm or in surrounding area.

 Report failure to record deaths to Animal Health

Failures should be discussed with line manager/ livestock co-ordinator/ PAO.

 Send report to Local Authority if there is evidence of on farm burial.

Problems should be discussed with line manager/ livestock co-ordinator/ PAO.

Rule of Thumb on what you may find at 2011 inspection (Tagging)

Description	Home bred animals (on HOB)	Animals that have left HOB (except concession)
This year's lambs born May 2011 – no big teeth	No tags	Intended for slaughter – single electronic tag, flock mark only. Replacement slaughter tags. Breeding animals – double tagged, with five digit individual number. One tag electronic. Any replacement tags in matching pairs.
Gimmers born May 2010- 2 big teeth	Double tagged, with five digit individual number. One tag electronic. Any replacement tags in matching pairs.	
One and Two crop ewes born May 2009 & May 2008 – 4 & 6 big teeth	Double tagged with conventional identifiers, six digit individual number. Replacements were fitted singly before 1/1/2010, these sheep may have two tags with different individual numbers (red or HOB) and may have one replacement and one HOB tag.	
Three and Four crop ewes born May 2007 & May 2006- Full mouth	Single Tag either S baseline or UK baseline with flock mark and six digit individual number. May also have S movement tags in (just flock mark, no individual number). If never tagged should be double tagged at inspection (baseline tags for holding it is on) Requirement in place to tag at 9 months of age for sheep born after July 2005.	
Five crop ewes & older sheep- Born May 2005 or before	No Tags or tag with no individual number. To be double tagged with one tag electronic when they leave the holding. (baseline tags for holding it is on)	Single tag Either UK baseline or S baseline with flock mark and six digit individual number.

Glossary of terms

AIT	Animal Identification and Traceability	A support team based in headquarters dealing with identification and traceability livestock issues.
AR	Add Recent	A code used on the SAMS report when adding a recent movement.
CPH	County Parish Holding	The identification system used by SGRPID to locate holdings (farms / crofts).
CSD	Customer Service Desk	A contact point when needing help.
EC	European Commission	
EU	European Union	
EID	Electronic Identification	Sheep born after 1/1/2010 require to have two identifiers fitted one of which must be electronic.
HOB tag	Holding of birth ear tag	A tag printed with the flock/herd mark belonging to the holding an animal was born on.
HSLO	Health and Safety Liaison Officer	A member of staff dealing with Health and Safety issues for your office.
Keepers Guidance	Sheep and Goat Identification and Traceability- Guidance for Keepers in Scotland January 2010	Guidance booklet issued in hard copy to industry and SGRPID area offices in January 2010
Knackery		A company or person who removes dead or casualty animals from farms.
MD	Movement Document	A form use to report animal movements between holdings / markets /slaughterhouses.
Objective		An electronic filing system used by the Scottish Government to store documents.
PAO	Principal Agricultural Officer	The person in charge of an area office or offices.
SAM	Animal Health Database	The computer database which stores information on people keeping sheep / goats.
SAMS	Scottish Animal Movement System	The computer database which stores information on sheep & goat movements in Scotland.
SAMU	Scottish Animal Movement Unit	The resource responsible for operating SAMS. The unit is currently based in Dumfries.
SG1	Sheep and Goat 1	The first part of our sheep/goat inspection form used by inspectors when doing an inspection.
SG2	Sheep and Goat 2	Part two of our sheep/goat inspection form used by inspectors when doing an inspection.
SG3	Sheep and Goat 3	A notice to restrict the movement of animals to and from a holding.
SG4	Sheep and Goat 4	A notice to lift a movement restriction from a holding.
SGII	Sheep and Goat Identification Inspections	A name for our inspections.
SGRPID	Scottish Government Rural Payments and Inspections Directorate	Our name.
SIACS	Scottish Integrated Administration & Control System	The Scottish Government's Common Agricultural Policy computer database.
SMR	Statutory Management Requirement	The keeper's obligations under existing laws.

Rural and Environment
Directorate
Animal Health and Welfare
Division

Animal Health and Welfare
P Spur
Saughton House
Edinburgh
EH11 3XD

α β γ δ ε φ η ι ω

March 2011

Dear Owner/Keeper

The Sheep Scab (Scotland) Order 2010, as amended

Sheep scab is considered to be endemic in many areas of Great Britain and if left untreated can seriously affect the welfare of the sheep affected. Given the highly contagious nature of the disease even those flocks with good management regimes are continuously fighting against infection. To assist the sheep industry in Scotland to deal with scab, new legislation was recently introduced which requires suspicion of disease to be notified and requires action to be taken to treat affected sheep.

The following information is provided as guidance for you to know what **action you must take** if you suspect the presence of sheep scab in your flock.

- The Order places a legal obligation on any person who knows or suspects that sheep in their possession or care have the disease to notify their local Divisional Veterinary Manager (DVM) as soon as possible. Failure to notify is a criminal offence.
- If you know or suspect sheep scab in your flock, you should restrict the movement of any sheep either onto or off the premises and take all reasonable steps to prevent affected sheep from straying or coming into contact with other sheep outside the premises.
- These restrictions will apply until all affected sheep have either been treated or slaughtered, all affected carcasses disposed of and 16 days have elapsed since the last disposal or treatment AND these actions have been notified to the DVM. Notification of treatment should also include details such as the date of treatment, number of sheep treated and the treatment used.

Other Key Points to note

- Where notification of suspected sheep scab is made to the DVM by someone other than the owner/keeper of the sheep, the owner/keeper will be advised of that fact by the DVM.
- Restrictions may then be imposed on the premise in question until such time as the owner/keeper's own veterinary surgeon can confirm in writing to the DVM that, in their opinion there are no affected sheep or carcasses on the premises.
- Exceptions to the movement restrictions include sheep being moved for treatment, slaughter, or under the authority of a licence issued by an Inspector
- If an inspector suspects that sheep scab exists, and owners have failed to either treat or slaughter affected sheep, a notice may be served requiring the owner/keeper to arrange and

pay for a veterinary enquiry to determine whether or not sheep scab is present. (If present follow steps outlined above).

- If sheep scab is suspected at markets or shows a notice can be issued by an Inspector requiring the affected sheep to be removed from the premises. either directly to a slaughterhouse, back to the premises from which they were brought for treatment or to any other premises approved by the Inspector for detention and isolation.
- If sheep scab is suspected on common grazing's, a clearance notice may be issued requiring all sheep on the land to be removed. Before sheep can be returned to the land written confirmation must be sent to the Local Authority detailing the date of treatment, number of sheep treated and the treatment used. No sheep can be moved back onto common grazing's until the Local Authority has provided written authorisation for them to do so.
- Local Authorities may also seize and detain any sheep found on common grazing's which are not authorised to be there. In order to regain possession of their sheep, an owner must prove ownership and pay any expenses incurred by the Local Authority in seizing and detaining those sheep within 7 days of seizure.

Useful Links

For the Order, the amendment Order, guidance on the order and info on sheep scab:

<http://www.scotland.gov.uk/Topics/farmingrural/Agriculture/animal-welfare/Diseases/disease/SheepScab>

For information and requirements of the Order – NFUS

<http://www.nfus.org.uk/news/2010/december/go-flow-scottish-sheep-scab-order>

Technical note and treatment options -

<http://www.sac.ac.uk/mainrep/pdfs/tn636sheepscab.pdf>

For disposal licences - SEPA - <http://www.sepa.org.uk>

QMS - <http://www.qmscotland.co.uk>

SOPA - <http://www.sopa.org.uk>

NSA - <http://www.nationalsheep.org.uk>

NOAH - <http://www.noah.co.uk>

Any queries arising from this letter should be addressed to either the address provided above or to Angela.McMorland@scotland.gsi.gov.uk or telephone number 0300 244 9805.

Yours faithfully,

Angela McMorland
Animal Welfare and Endemic Diseases

Animal Health Pro-forma (Keeper Registration)				
(Sheep) SIACS Producer Business Name:				
MFC (CPH):				
		Are the CPH's in Column A, registered on VETNET/SAM as holdings where sheep or goats are kept?	Is Our (MFC) Producer registered on VETNET/SAM to keep sheep at the CPH's in Column A?	Flock Mark
	Column A (CPH)			
Main Farm Code (CPH):		Yes or No*	Yes or No*	
Other CPH permanent or seasonal*:		Yes or No*	Yes or No*	
Other CPH permanent or seasonal*:		Yes or No*	Yes or No*	
Other CPH permanent or seasonal*:		Yes or No*	Yes or No*	
Other CPH permanent or seasonal*:		Yes or No*	Yes or No*	
Other CPH permanent or seasonal*:		Yes or No*	Yes or No*	

*** Delete as appropriate
Requested by SGRPID**

NAME: _____

DATE: _____

Completed By Animal Health

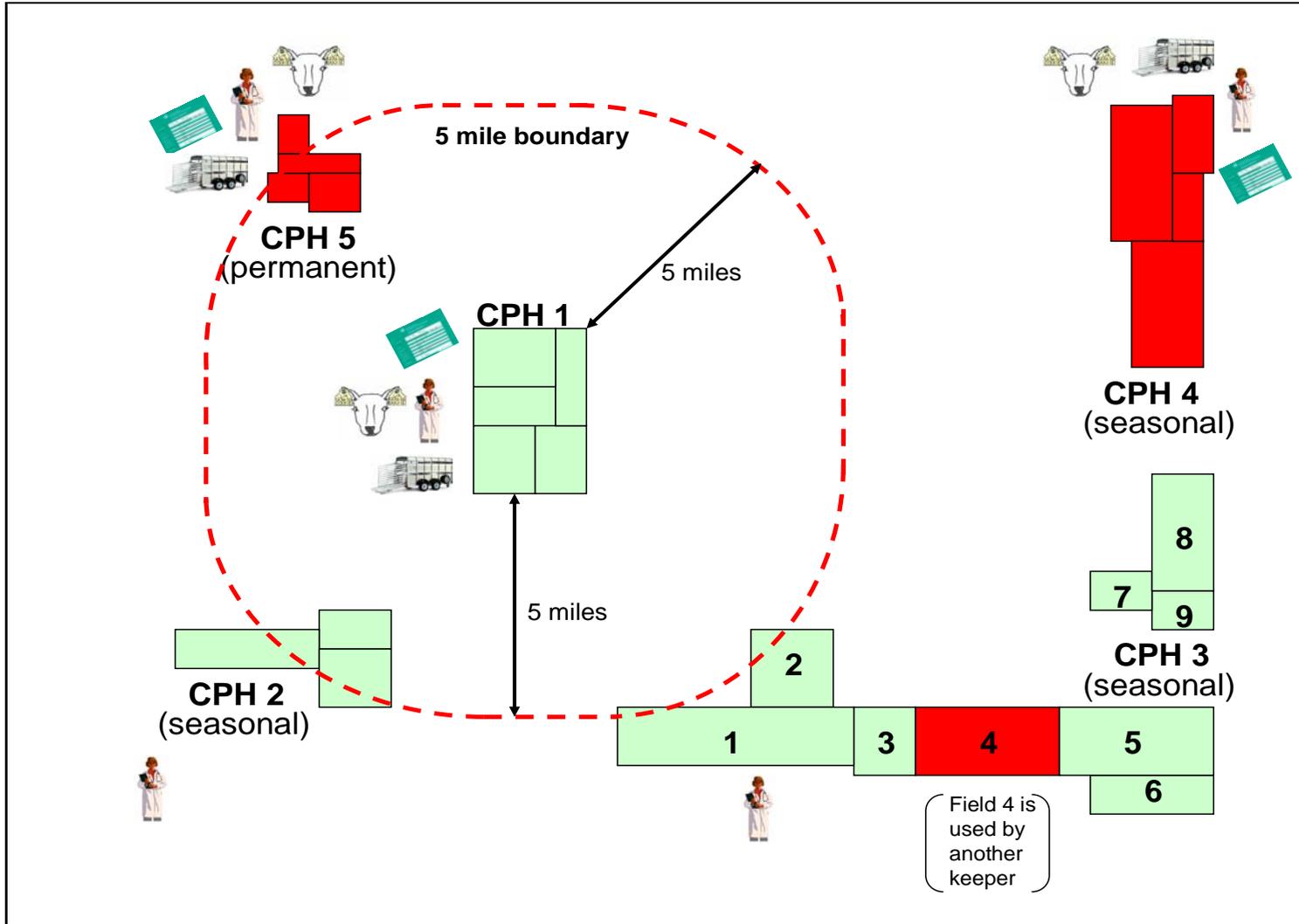
NAME: _____

DATE: _____

Market Common CPH Numbers	
Location	CPH number
Avon Logie (Islay)	68/149/8005
Ayr Market	69/176/8004
Borderway Mart (Carlisle)	08/067/8019
Caithness - ANM	73/282/8600
Castle Douglas Market	82/492/8004
Dalmally UA	68/171/8001
Dingwall & Highland Marts	91/740/8600
Dumfries Market	75/300/8001
Elgin - ANM	85/592/8000
Forfar Market	67/102/8001
Fort William UA	79/455/8600
Huntly UA	66/077/8000
Islay UA (Bridgend)	68/149/8001
Kelso Sales	92/785/8002
Kirkwall Market	87/620/8007
Lairg UA	96/834/8600
Lanark Market	83/536/8300
Lerwick Market	94/875/8001
Lewis & Harris Market	91/755/8600
Lochmaddy UA	79/457/8600
Lockerbie Market	75/319/8004
Lochboisdale UA	79/465/8601
Longtown Market	08/181/8000
Newton Stewart Market	98/856/8003
Oban CM	68/174/8000
Portree UA	79/461/8600
St. Boswells	92/796/8003
Stirling CM	95/808/8301
Stirling AC (UA)	89/718/8008
Thainstone - ANM	66/062/8001
Tiree Market (Crosspol)	68/168/8001
Wooler Market	31/173/8000

Abattoir Common CPH Numbers	
Location	CPH number
A P Jess Ltd (Brechin)	67/084/8004
Barra Slaughterhouse	79/443/8001
Blackwaterfoot Slaughterhouse	72/274/8003
Buitelaar (Kilmarnock)	69/206/8002
Caithness Beef & Lamb	73/283/8501
D S Slaughterhouse Ltd (Dunblane)	89/715/8501
Dunbia (Preston)	21/012/8011
G D Vivers & Son (Annan)	75/297/8000
Heather Isle Meats (Stornoway)	91/755/8500
Highland Meats Ltd (Saltcoats)	69/216/8000
Isle of Mull Slaughterhouse	68/166/8000
James Chapman Butchers (Shotts)	83/548/8500
John Munro Ltd (Dingwall)	91/740/8500
Lockerbie Abattoir	75/319/8005
Mathers Ltd (Inverurie)	66/062/8005
McIntosh Donald (Portlethen)	80/471/8000
Orkney Meat Ltd	87/620/8002
R Miller Ltd (Grantown-on Spey)	85/586/8500
Ramsay of Carluke	83/531/8500
Rhinds of Elgin	85/593/8000
Sandyford Abattoir (Paisley)	90/725/8004
Scarinish Slaughter House (Tiree)	68/168/8002
Scotbeef (Bridge of Allan)	89/715/8500
Scotch Premier Meat Ltd (Dornoch)	96/830/8004
Scottish Border Abattoir (Galashiels)	92/796/8004
Shetland Abattoir	94/883/8002
St Andrews Abattoir Co Ltd	78/431/8002
West Scottish Lamb(Carlisle Abattoir)	08/067/8000
Wick Slaughterhouse	73/283/8500
Wishaw Abattoir	83/546/8500
Woodhead Bros. (Turriff)	66/083/8000

5 Mile concession



-  Keeper Registration Required.
-  Tagging Required.
-  Separate flock register required.
-  require to complete movement documents and notify moves to SAMU.