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Dundonald House
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Date: Thursday 29th November 2018

FAO: Stephen Johnston and Paula Magill DAERA Agri-Food Policy II

FROM THE PRESIDENT

Ulster Farmers' Union- submission to consultation on “The Carcass Classification and Price Reporting Regulations (Northern Ireland) 2018”

The Ulster Farmers’ Union (UFU), which represents around 11,500 farming families in Northern Ireland, would like to provide the following submission.

Northern Ireland Legislation

DAERA proposes to implement the following new requirements of the EU Regulations through the Carcass Classification and Price Reporting Regulations (Northern Ireland) 2018:

- Increased thresholds for mandatory classification of beef carcasses (bovines aged 8 months and over) from 75 to 150 carcasses per week; and for mandatory classification of pig carcasses from 200 to 500 carcasses per week (both on an annual average basis).

The UFU would have concerns in relation to the increasing thresholds for mandatory classification of beef carcasses from 75 to 150 carcasses per week. The UFU believe that every bovine slaughtered in Northern Ireland should be classified. UFU are aware that there is only one slaughter factory processing under the 150 carcasses per week. In relation to openness and transparency, it is key that all bovines should be classified within the supply chain.

- Pig abattoirs which are classifying to provide the following details to the suppliers of animals sent for slaughter: classification results, carcass weights, carcass presentation and (where applicable) if the classification has been carried out using an automated grading technique. *Further details on the key changes for pig processing are outlined in Appendix 1.*

The UFU is supportive of this provision.

- Pig abattoirs slaughtering over the new thresholds (500 pigs per week) to supply details of deadweight prices for certain weight categories of pigs to the Competent Authority (or third party on behalf of the Competent Authority), who will then collate and send a weekly return to the European Commission. The categories are 60kg to <120kg (codes S and E) and 120kg to <180kg (code R).

The UFU is supportive of this provision.

- An additional deadweight category, U4 to be price reported to LMC for bovine carcasses of other female animals aged from 12 months.

The UFU are aware that this has already been taking place since July 2018 and would like this to remain in place going forward.

APPENDIX 2

RESPONSE ABOUT THE DEROGATION FOR MARKING OF CARCASSES

There is a derogation in the EU rules for the marking of carcasses not to be compulsory, provided that:

- (a) an official record is drawn up and includes for each carcass at least:
 - a. individual identification by any unalterable means,
 - b. warm weight of the carcass, and
 - c. result of the classification.
- (b) All the carcasses are cut, as a continuous operation, in a cutting plant approved in accordance with Regulation (EC) No 853/2004 of the European Parliament and of the Council and attached to the slaughterhouse.

Question 1. Should the derogation for the marking of carcasses be included in the NI regulations:

(i) for beef carcasses and pig carcasses?

YES

Please state why

The current system holds the right for the derogation and the UFU believe that this should remain. Currently official records are drawn up and carcasses are cut in a continuous operation. The UFU believe that the flexibility within the supply chain should remain should it be required in the future.

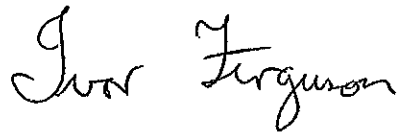
Question 2. To what extent is it important that we harmonise with the position in other parts of the UK?

The UFU believe that it is extremely important to harmonise with the position in other parts of the UK but that consideration must also be given to the position in the Republic of Ireland. Market access and the ability to trade across the UK and to the EU is key for the economic stability of farm businesses within Northern Ireland.

The UFU would like further clarification on the views of other parts of the UK on this matter and the views from the Republic of Ireland in order to make any further comment.

I trust that these comments are of use and will be fully considered in this consultation process.

Yours sincerely,

A handwritten signature in black ink that reads "Ivor Ferguson". The signature is written in a cursive, slightly slanted style.

Ivor Ferguson (UFU President)

