

Summary of Responses to the Public Consultation on

“Possible Changes of Use of Personal Data Held on the GB Poultry Register”

(13th November 2007 - 5th February 2008)

July 2008



Llywodraeth Cynulliad Cymru
Welsh Assembly Government



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1 Executive Summary

In December 2005, the Department for Environment, Food and Rural Affairs (Defra), in partnership with the Scottish Executive (SE) and the Welsh Assembly Government (WAG) established the Great Britain Poultry Register (GBPR) in response to an increased threat of an outbreak of highly pathogenic avian influenza¹. The uses to which it has so far been put have been largely limited to avian influenza risk assessment, prevention and control. As well as personal data being used for this purpose, we have also used aggregated data from the register, which does not reveal the identities of individuals or their premises, for various statistical purposes.

However, the GBPR is a major new resource which could significantly enhance Government's ability to prevent and control a variety of other diseases and infections of poultry, as well as providing benefits to the poultry industry itself by providing relevant information and advanced warning of threats or notification of outbreaks.

A consultation on the "Possible Changes of Use of Personal Data Held on the GBPR" was launched on the 13 November 2007 as part of the Government's 'Better Regulation' policy. Use of the GBPR data for other purposes could benefit both farmers and wider society, as it will allow better joined up government working and will reduce the need to ask for the same data on numerous occasions, whilst still satisfying obligations under the Data Protection Act and other legislation.

The consultation document set out a number of possible different uses to which the personal data held on the GBPR might be put, including -

- wider animal health and other civil emergencies
- other uses within Defra, its Executive Agencies and WAG
- other uses by other Government Departments and Non Departmental Public Bodies, such as the Environment Agency or HM Revenue and Customs.

The consultation period closed on the 5th February 2008. 469 individuals and 31 organisations responded to the consultation exercise. This report summarises the comments and views expressed in these responses. The document is organised according to the main themes identified above and the main conclusions drawn under each of these themes is set out in the Key Messages at section 2.

Defra is very grateful to all those stakeholders who took the time to respond to the consultation. This will be used by Government in considering any possible future changes to policy in this area.

The responsibility for operating and maintaining the GBPR has now transferred from core Defra (the Data processor for England, Scotland and Wales under the terms of the Data Protection Act 1998) to Animal Health, one of its executive agencies, which will be responsible for taking forward whatever decisions are taken as a result of this consultation. **The security of your personal data will continue to be a priority and the GBPR will continue to be covered by all applicable legislation including the Data Protection Act.**

¹ As of May 2008, some 44,000 keepers have registered

2 Key Messages

The questions in the consultation exercise were divided into three themes which reflected a possible future use of the Great Britain Poultry Register (GBPR). The key messages received in response to each of these themes is summarised below.

2.1 Part I – Animal Health and other Civil Emergencies

The majority of respondents supported proposals that data on the GBPR should be used

- for other notifiable diseases as it is for avian influenza
- to provide information to Category 1 and 2 responders expected to respond and recover from an animal disease outbreak, and
- to extend the use of the personal data in baseline surveys, and for surveillance and control programmes, in respect of zoonoses and other endemic diseases of poultry.

Most individuals and organisations [except notably the British Egg Industry Council (BEIC) and the British Poultry Council (BPC), which represent 90% of the UK egg producers the vast majority of the UK poultry meat production] also supported the proposal to extend the use of the GBPR to provide data to the European Commission to substantiate a claim for compensation from the European Union (EU) in the event of a disease outbreak.

There was a mixed response about whether the GBPR should be used to provide information to Category 1 and 2 responders expected to respond and recover from a wider civil emergency, such as flooding. Some 40% of individuals were in support. Most organisations which represented the poultry industry did not support this proposal, with the exception of BPC, BEIC and BASC who were supportive. Organisations which represented other sectors (e.g animal welfare and the wider public interest) were strongly in favour of using the GBPR for this purpose.

The majority of respondents did not support the proposal to allow Animal Health (AH) to use personal data on the GBPR to plan welfare inspections, or to plan visits to check farm medicine record books and take samples that will be tested for residues. However notably, the BEIC and the BPC, were in favour of AH using the data for these purposes as long as there was no additional data requirement imposed on those already registered.

2.2 Part II – Other Uses within Defra, its Executive Agencies and WAG

Most individuals and organisations representing the poultry industry (except the BPC) did not agree that information from the GBPR should be used to undertake ad-hoc surveys and/or to supplement regular agricultural surveys, or that Defra's and Welsh Assembly Government's (WAG) statisticians and economists could use personal data on the GBPR to inform their work. However, organisations representing other sectors (e.g. animal welfare or the wider public interest) were clearly in favour of these proposals, and traditional poultry keepers and the BPC were also more inclined to be supportive about the use of the GBPR for these purposes.

The majority of respondents did not support use of the GBPR -

- to allow AH and the Rural Payments Agency (RPA) to have access to the personal data to assist with the selection and the planning of appropriate visits to check that the statutory management requirements of the Single Payment Scheme are being met
- to send details of information or invitations to Defra and WAG events,

- to facilitate mail-shots from commercial companies, or
- to facilitate a 'one stop shop' approach for future customer contact planning.

2.3 Part III – Uses by Other Government Departments and Non Departmental Public Bodies

The majority of respondents did not support proposals that personal data on the GBPR could be made available to other government departments or NDPBs -

- such as the Environment Agency, so that concerns about public health or the environment can be addressed
- such as HM Revenue and Customs, when there is a good reason and any information sharing is in line with UK privacy and data protection laws.

2.4 Other Concerns

Although not specifically part of the consultation, it is worth noting that some respondents raised concerns about Government's ability to maintain personal data on the GBPR in a secure manner, leading to worries about -

- Animal rights activists obtaining copies of the data, and resultant attacks on person and property
- Rural theft, especially if their stock was particularly valuable
- Other data protection issues

A few respondents also commented adversely on the use of the data for the programme of human flu vaccination for poultry workers, even though the Data Protection Statement associated with the GBPR includes such use.

The NFU felt that individual signatories to the register should have the option to restrict the use of their individual data, by having the facility to contact Animal Health and request this restriction. For those who did not request such restriction, their data should be used solely for the purpose of preserving the health of flocks, and controlling disease.

Finally, some opinions expressed indicated a disagreement with the consultation exercise itself, because the information on the GBPR had been collected originally for avian influenza purposes, and confidentiality promises had been made accordingly at the time.

3 Introduction

3.1 Background

In December 2005 the GBPR was established in response to an increased threat of an outbreak of highly pathogenic avian influenza. It has the potential to be an important tool for the prevention and control of many poultry diseases, but its wider use has been restricted, as we had given strict assurances that the personal data on the register would only be used for a limited range of specified purposes relating to avian influenza. We have therefore been cautious about the further use of personal data from the register, although, we have used aggregated data, which does not reveal the identities of individuals or their premises, for various statistical purposes. In practice, this has meant we have had to spend considerable time and resources gathering information in other ways, when it was needed for purposes other than avian influenza.

It was decided to explore whether the personal data on the GBPR could be used more widely, to improve the service that we can offer to poultry keepers while continuing to ensure that it is kept secure and used lawfully. Use of this data for other purposes will benefit both government and farmers as it will allow better joined up working and will reduce the need to ask for the same data on numerous occasions. This is in the spirit of service transformation set out in the Varney report (http://www.hm-treasury.gov.uk/pre_budget_report/prebud_pbr06/press_notices/prebud_pbr06_pressvarney.cfm).

The consultation was issued on 13 November 2007 and over 500 organisations and everyone in England and Wales whose details were on the GB Poultry Register were invited to respond. The consultation document covered a range of issues where views were sought and to aid replies a **yes/no pro-forma** was devised to aid those wishing to respond. There was a 12 week consultation period and the closing date for receipt of responses was 5 February 2008. A few days grace was allowed for late responses.

Defra is very grateful to all those stakeholders who took the time to respond to the consultation.

3.2 Classification of Respondents

A letter which included 17 questions (and a proforma for replying) was sent to representative organisations and individuals registered as keepers, owners or occupiers of poultry premises on the GBPR. Responses from “individuals” as opposed to “organisations” were classified and considered separately.

Table 1 Breakdown of the number and type of responses received from individuals and organisations

Type of Respondent	Proforma returned	Proforma returned plus additional comments	No proforma returned. General feedback received by letter / email	Total
Individual	266	53	150	469
Organisation	10	19	2	31

3.3 Responses from Individuals

Of the 469 individuals who responded to the consultation, only 319 returned the proforma. These responses have contributed to the subsequent charts and graphs in this document. All general feedback received as letters, emails or supplementary comments has been reviewed and analysed separately and key points are highlighted in the discussion of each question in section 4.

The 319 individuals who returned a proforma can be categorised further by their country of origin, their role and the type of poultry they represent.

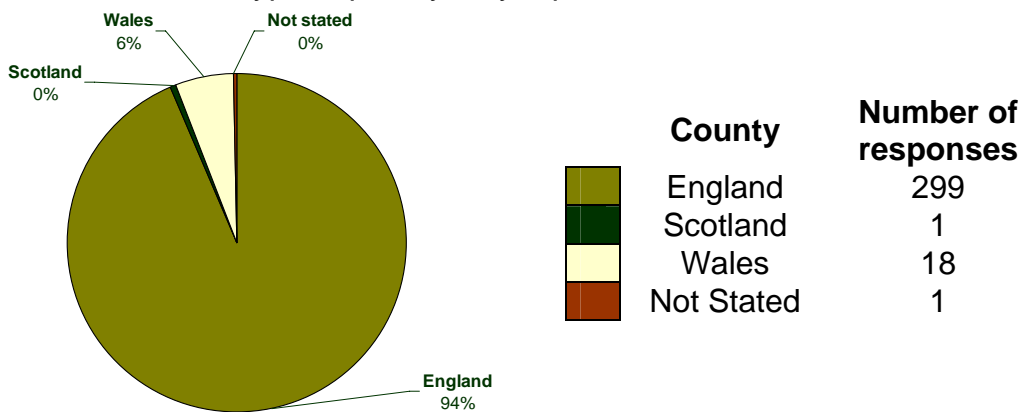


Figure 1 Number of individual respondents from England / Scotland / Wales

The vast majority (94%) of responses were from individuals in England. Only 6% of respondents were from Scotland, Wales or “Not Stated”. Further analysis of the data has shown that there were no clear differences in responses between respondents from different countries. Therefore answers from all countries have been combined and country-specific analysis has not been presented further in this document.



Figure 2 Number of individual responses received from keepers / owners / occupiers of poultry premises

Responses to the consultation were received from individuals from all different roles. Figure 2 shows a breakdown of the number of respondents that identify themselves as a keeper, owner,

occupier, other (i.e. those who identified themselves as a member of the public or as “other”) or not stated. This shows that the majority of responses were received from individuals who identify themselves as an owner or keeper of poultry. It also shows that the majority of respondents class themselves as more than one type (e.g. keeper and owner) and therefore the number of respondents in each category adds up to more than the total number of individual responses received.

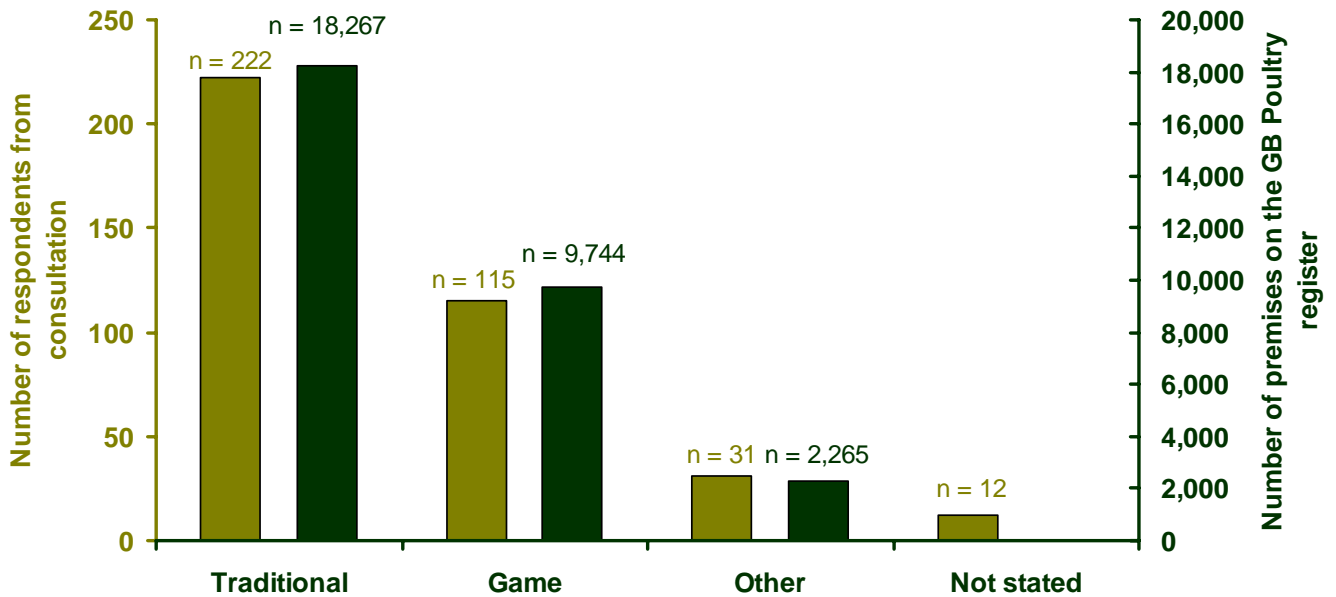


Figure 3 Number of responses received from individuals representing different types of poultry enterprises and the number of premises registered on the GBPR as keeping different types of poultry

Responses were received from individuals that kept traditional, game or other species of poultry. For the purposes of this report, traditional species were classed as chickens (including bantams), ducks, turkeys and geese. Game species were defined as partridges and pheasants and other species were classed as quail, guinea fowl, pigeons, ostriches, emus and rheas. If an individual kept more than one type of species (such as traditional and game species) then they will appear in more than one column in figure 3. Thus the number of respondents across all types of poultry will add up to more than the total number of responses received.

The proportion of respondents for each poultry type were very similar to the type of premises registered on the GBPR, as can be seen in Figure 3. The darker bars in figure 3 were produced from an extract of the GBPR taken on the 09 May 2008 and contained all premises registered as keeping poultry species (a total number of 24,310 premises). This shows that the individual respondents to the consultation can be considered to be a fair representation of the poultry enterprises currently registered on the GBPR.

3.4 Responses from Organisations

Of the 31 organisations who responded to the consultation, 29 returned the proforma. These 29 responses were further classified by those organisations representing some aspect of the poultry industry (organisations – industry) and those representing other sectors (organisations – other) and have contributed to the subsequent charts and graphs in this document. A summary of the number of organisations in each category is provided at figure 4 and the full list of organisations (with their abbreviations) and their corresponding classification is provided at Annex 1. All general

feedback received as letters, emails or supplementary comments has been reviewed and analysed separately and key points are highlighted in the discussion of each question at section 4.

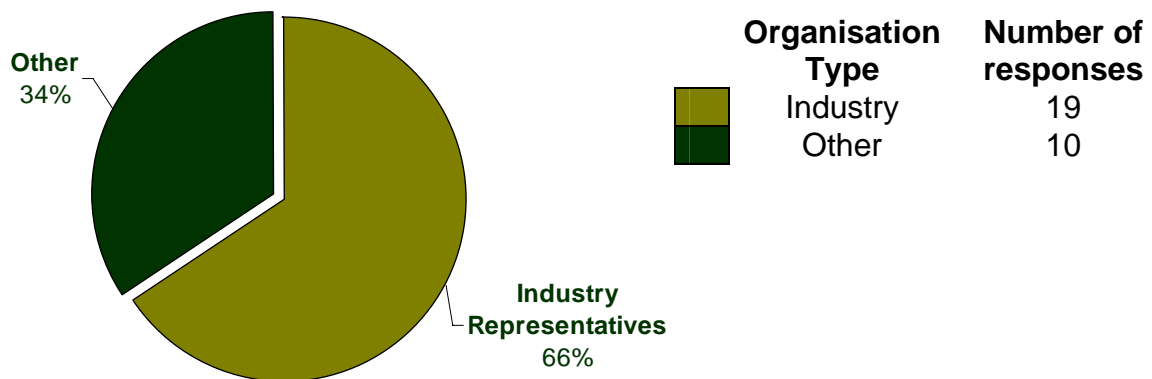


Figure 4 Number of responses received from organisations representing the poultry industry or other sectors

Having taken account of these responses, it was considered appropriate to consider particular bodies in terms of their representation of the poultry industry. For instance, The British Egg Industry Council (BEIC) represent 90% of the UK egg producers while the British Poultry Council (BPC) represent the vast majority of the UK poultry meat production. The single responses received from these organisations were considered to reflect the opinion of all their members. This was therefore taken into account and, where appropriate, highlighted in the analysis of responses so as to provide a balanced view across the poultry industry.

Below is a brief profile of some of the organisations which responded to the consultation, some poultry producers will be represented by more than one of these organisations:

British Egg Industry Council (BEIC)

The BEIC is an inter-professional organisation of 11 trade associations in the UK, which cover all aspects of the egg industry – breeding, rearing, laying, packing, egg processing and marketing. The principle function of the BEIC is to represent the interests of its Members (the UK egg industry) in discussions with Government, MPs, the European Commission, European Parliament, and other bodies. BEIC also finances research and development.

British Poultry Council (BPC)

The BPC is the leading trade association in the poultry meat sector representing the vast majority of UK production. Membership of the BPC includes companies and individuals engaged in breeding, hatching, rearing, slaughtering, and processing chickens, turkeys, ducks and geese to produce poultry meat. BPC is also the representative organisation for poultry primary breeding in the UK.

National Farmers Union (NFU)

The NFU represents the interests of some 55,000 businesses which are engaged in a diverse range of agricultural, horticultural and related activities throughout England and Wales and more specifically, 5500 poultry businesses in England and Wales.

The Poultry Club of Great Britain

The Poultry Club of Great Britain was founded in 1877 and exists to safeguard the interests of all pure and traditional breeds of poultry, both in Great Britain and throughout the world. As guardians of the 'British Poultry Standards', the club has a crucial role in safeguarding stock bloodlines which have been maintained for generations.

Laid in Britain Producers Ltd and UK Egg Producers Association

Laid in Britain Producers are members of the United Kingdom Egg Producers Association, which caters for the smaller to medium sized egg producer who wishes to have the closest contact with the end user, their customers. Laid in Britain is an extension of this arrangement.

British Association for Shooting and Conservation (BASC)

BASC was founded in 1908 as the Wildfowlers' Association of Great Britain and Ireland and is the UK's largest shooting association. BASC is constituted as an Industrial and Provident Society and has a membership in excess of 127,000. BASC is the representative body for sporting shooting and the well being of the countryside throughout the UK and overseas.

National Gamekeepers' Organisation (NGO)

The National Gamekeepers' Organisation is the national representative body for gamekeepers in England and Wales. It was established in 1997 by a handful of gamekeepers who felt their profession was inadequately represented and who wanted to explain and defend their livelihood. The NGO has over 12,000 members. It defends and promotes game keeping, helps gamekeepers and ensures high standards throughout the profession.

Game Farmers' Association (GFA)

The GFA is a trade organisation dedicated to the production of quality game birds for the UK shooting industry. Most game farmers in Britain are members and the Association represents their interests, as well as encouraging everyone who rears game to pursue high standards. The Association was founded over eighty years ago and now has in excess of 200 game farming members.

3.5 How to Obtain Copies of Responses from Organisations

Copies of responses from the industry representatives and other organisations responding to this consultation have been placed in the Defra library at the Information Resource Centre (IRC) at Ergon House, c/o 17 Smith Square, London SW1P 3JR (Telephone 020 7238 6712). For those wishing to obtain copies of comments, an administrative charge to cover copying and postage will be made. To enable requests to be dealt with efficiently and to avoid delay for those calling at the Library in person, it would be appreciated if personal callers could give the Library at least 24 hours' notice of their requirements.

4 Consultation Questions

Part I – Animal Health And Other Civil Emergencies

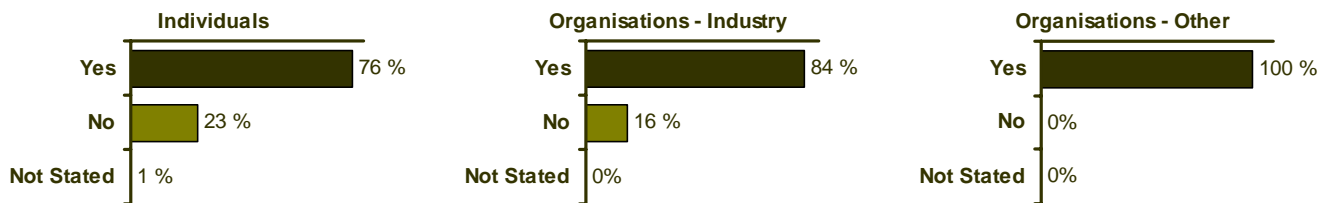
4.1 Question 1

Do you agree that data on the GB Poultry Register should be used for other notifiable diseases, as it is for avian influenza?

4.1.1 Analysis of Responses to Question 1

The majority of proforma responses received from individuals, industry and other organisations were positive.

Figure 5 Summary of proforma responses to Question 1*



Further analysis of the returned proformas showed that similar support was received from all individual respondent types and was not related to poultry type, role type (e.g keeper or owner etc.) or flock size.

The majority of industry organisations also gave positive responses and all responses from organisations representing other sectors were in favour of this proposal, notably -

- The BEIC, BPC, BASC, GFA, NGO, NFU, The Poultry Club of Great Britain and Laid in Britain all provided positive responses.

Many organisations commented that the GBPR had demonstrated its effectiveness during recent outbreaks of avian influenza and were supportive of further use of the register to support the control of other disease outbreaks in poultry. Examples of some comments include:

- The BEIC said that the Poultry Register had demonstrated its effectiveness during the recent outbreaks of notifiable avian disease and was supportive to the use of personal data held on the GB Poultry Register for other notifiable poultry diseases.
- The BPC were also supportive and commented that the register was a very useful database and should be available to assist with the implementation of poultry disease and control beyond just Avian Influenza and Newcastle Disease and that this could also include zoonotic diseases such as Salmonella.

* The actual number of positive/negative responses to each question is provided at Annex 2

- The NFU said ‘the NFU believe that use of the register for disease control purposes could be prudent.’
- The BASC were supportive and saw merit in extending the GBPR to include Newcastle disease and other appropriate diseases.
- AVOIRNIS were supportive that the GBPR should be used for notifiable diseases, purely for containing the disease. However, they did not accept that the data should be used for any other purpose without the prior consent of the individual or organisation concerned.
- The British Waterfowl Association, although supportive of the GBPR being used for the prevention and control of poultry diseases, had data security concerns and did not wish the data to be passed to third parties.

4.1.2 Summary of Responses to Question 1

The majority of responses from individuals, industry and other organisations supported the proposal that data on the GBPR should be used for other notifiable diseases as it is for avian influenza.

4.2 Question 2

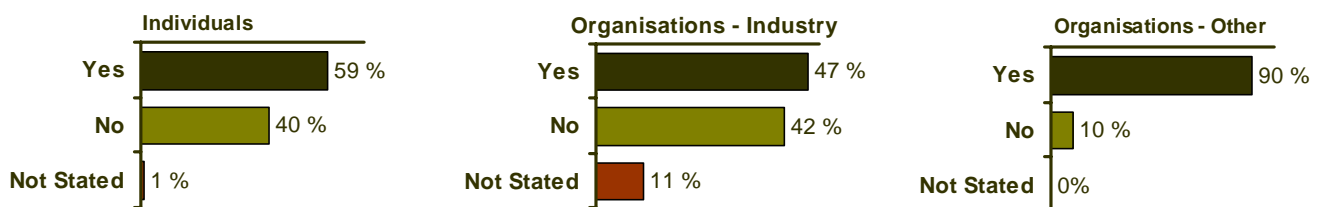
In addition to personal data being available to Defra, its executive agencies and WAG should personal data from the Register be provided to those bodies expected to respond to an **animal disease outbreak**³ (the Civil Contingencies Act refers to them as Category 1 and 2 responders) (information would be provided for planning purposes and/or responding and recovering from an animal disease outbreak only) so that:

Question 2a: they can plan for and **respond and recover from** an animal disease outbreak?

4.2.1 Analysis of Responses to Question 2a

The majority of proforma responses received from individuals and other organisations were positive. However an equally balanced positive and negative response was received from organisations representing the poultry industry.

Figure 6 Summary of proforma responses to Question 2a*



Further analysis of the returned proformas showed that for individual respondents, similar support for question 2a was received from all respondent types and was not related to the poultry type, role type or flock size.

An equal number of positive and negative responses were received from industry organisations, whereas the vast majority of other organisations gave positive responses, notably -

- The BEIC, BPC, BASC, GFA, and the NGO all provided positive responses.
- The NFU indicated that 'the list should only be accessed centrally by Animal Health, and relevant data then supplied to emergency services or relevant bodies, and always *if possible* in an anonymous aggregated format'. Given this ambiguity, the NFU response to this question was categorised as 'not stated' in the chart above.
- Laid in Britain provided a negative response.

The general feedback received indicated that respondents recognised a need to provide information to ensure that effective planning and responding to an animal disease outbreak was possible. Examples of some comments received are:

- Countryside Alliance commented that it was clearly desirable that those responsible for planning and responding to a disease outbreak should have the necessary information to make that planning and response possible... *"The Alliance accepts that in dealing with any*

³ See Chapter 6 of Defra's Emergency Response Plan for exotic animal diseases which sets out how the police, the Environment Agency and others contribute to the multi-agency response to disease outbreaks <http://www.defra.gov.uk/animalh/diseases/control/contingency/exotic.htm>

* The actual number of positive/negative responses to each question is provided at Annex 2

disease outbreak the speed of response and effective dissemination of information is key and that the Poultry Register is an important resource for ensuring this.” They did however question whether the sharing of personal information was necessary beyond Category 1 Responders (Category 1 and 2 Responders are defined in Annex D of the consultation document). Their agreement to an extension of the use of the Poultry Register as proposed in Question 2 was subject to this reservation.

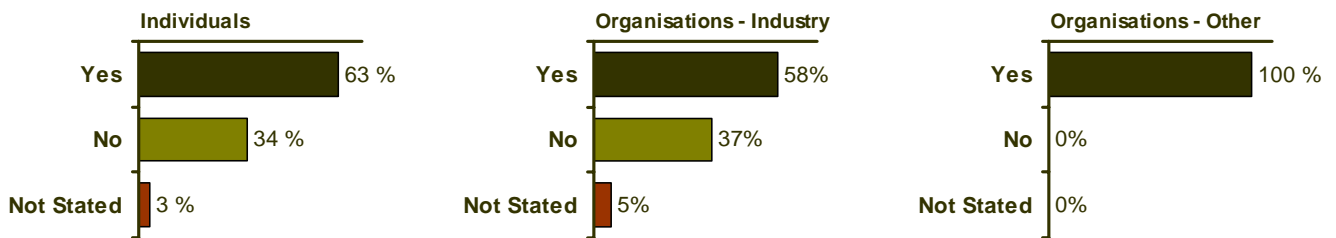
- ADAS although supportive in their response, commented that although they recognise the importance of access to information in the face of a disease outbreak, they had concerns regarding the number and range of organisations classified as Category 1 and 2 Responders, and therefore the associated risk of data being used beyond purposes for which it was originally intended.

Question 2b: they can respond and recover from an animal disease outbreak?

4.2.2 Analysis of Responses to Question 2b

The majority of proforma responses received from individuals, industry organisations and other organisations were positive.

Figure 7 Summary of proforma responses to Question 2b*



Further analysis of the returned proformas showed that for individual respondents, similar support for question 2b was received from all respondent types and was not related to the poultry type, role type or flock size.

The majority of responses from industry organisations were positive and all other organisations were in favour of question 2b, notably -

- The BEIC, BPC, BASC, GFA, NGO and The Poultry Club of Great Britain provided positive responses.
- The NFU and Laid in Britain responses were the same as for question 2a.

Overall, the general feedback comments received were the same as those presented for question 2a.

4.2.3 Summary of Responses to Question 2a and 2b

The majority of responses from individuals, and other organisations supported the proposal to use the GBPR to provide information to Category 1 and 2 responders expected to plan for and respond and recover from an animal disease outbreak. Organisations representing the poultry

* The actual number of positive/negative responses to each question is provided at Annex 2

industry were in favour of providing data to respond and recover from a disease outbreak, but gave an equally balanced response about whether the data should also be used to plan for an outbreak.

4.3 Question 3

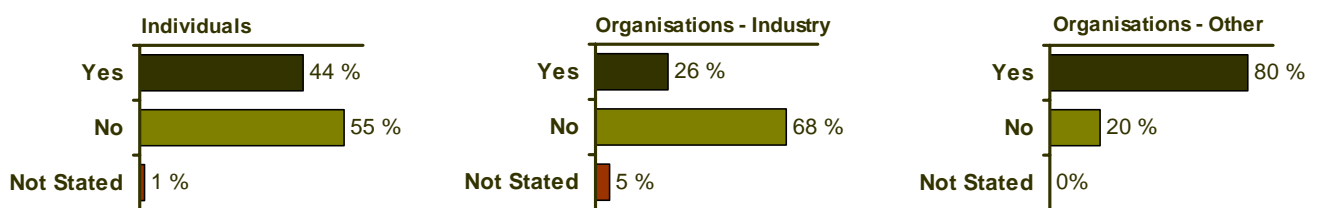
Should personal data from the Register be available to Defra and WAG and also be provided to those bodies expected to respond to a **civil emergency**⁶ in your area, (the Act refers to them as Category 1 and 2 responders) (information provided could only be used for planning purposes/responding and recovering from an emergency) so that:

Question 3a: they can plan for and respond and recover from all civil emergencies (including outbreaks of animal disease)?

4.3.1 Analysis of Responses to Question 3a

The majority of proforma responses from individuals and organisations representing the poultry industry were negative, but the majority of responses from organisations representing other sectors were positive.

Figure 8 Summary of proforma responses to Question 3a*



Further analysis of the returned proformas showed that although the majority of individuals gave negative responses to question 3a, respondents which kept traditional poultry species provided more balanced responses (49% were positive) whereas those which kept game species were more negative (37% were positive). Responses also differed dependent on role; the majority of occupiers were positive (67%) although the majority of keepers (41%) owners (40%) and mixed (49%) were not in favour of question 3a, however this apparent trend may be due to the low numbers of responses from occupiers.

The majority of proforma responses from industry organisations were negative, however responses from organisations that represent traditional poultry types were more balanced than organisations representing mixed poultry types. The majority of other organisations were strongly in favour of question 3a:

- The BEIC, BPC, BASC and the majority of other organisations provided supportive responses.
- The NFU, GFA, NGO and Laid in Britain provided negative responses.

Question 3b: they can **respond and recover from** all civil emergencies (including an outbreak of animal disease)?

4.3.2 Analysis of Responses to Question 3b

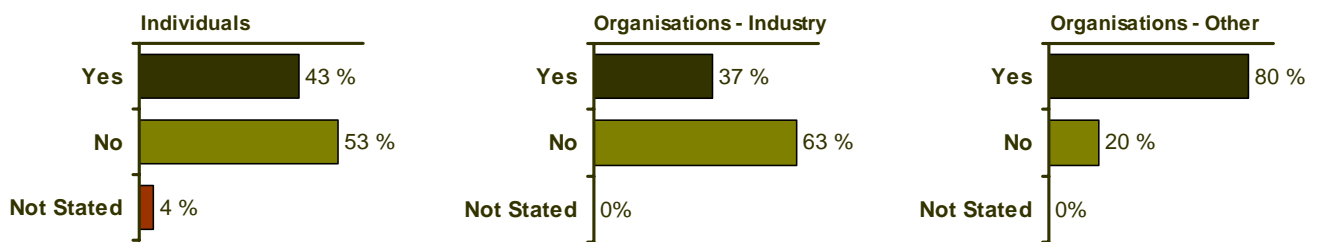
The proforma responses for question 3b were very similar to the responses received for question 3a. The majority of responses from individuals and industry organisations were negative although

⁶ Civil emergencies could take a variety of forms, for example action to protect poultry premises from flooding.

* The actual number of positive/negative responses to each question is provided at Annex 2

the majority of responses from other organisations were positive.

Figure 9 Summary of proforma responses to Question 3b*



Further analysis of the returned proformas showed that as for question 3a, the majority of responses from different groups of individuals were negative although there was indication that the responses from traditional keepers were evenly balanced (47% were in favour) than the responses from individuals who kept game poultry (only 39% were supportive). As with question 3a, occupiers were also more supportive of this proposal (67% positive) than other roles.

The majority of responses from industry organisations were negative, however responses from organisations that represent traditional poultry enterprises were more evenly balanced than organisations representing other types of poultry. Organisations representing other sectors were strongly in favour of question 3b.

- The BEIC, BPC, BASC and the majority of other organisations provided supportive responses.
- The NFU, GFA, NGO, The Poultry Club of Great Britain and Laid in Britain provided negative responses.

The Countryside Alliance felt that extending access to Category 1 and 2 responders for all civil emergencies was unnecessary and that in the event of a civil emergency it would be for Defra to use the information on the GBPR to contact individuals who may be affected. It was also considered that aggregated data would suffice, for instance, in the event of escaped gases.

4.3.3 Summary of Responses to Questions 3a and 3b

The majority of responses from individuals and organisations representing the poultry industry did not support proposals to use the GBPR to provide information to Category 1 and 2 responders expected to plan for and/or respond and recover from a civil emergency. However, organisations representing other sectors were strongly in favour extending the use of the GBPR to include this purpose.

* The actual number of positive/negative responses to each question is provided at Annex 2

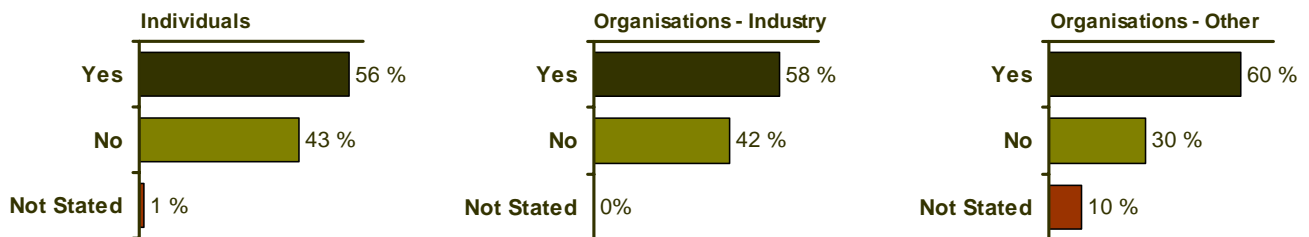
4.4 Question 4

Should personal data from the GB Poultry Register be provided to the Commission to substantiate a claim for compensation from the EU in the event of disease outbreak?

4.4.1 Analysis of Responses to Question 4

The majority of proforma responses from individuals, industry and other organisations were positive.

Figure 10 Summary of proforma responses to Question 4*



Further analysis of the returned proformas showed that although the majority of individuals gave positive responses to question 4, respondents which kept traditional poultry species were more strongly in favour (63%) than respondents that kept mixed poultry (53%) or game (45%). No other clear trends were apparent in the data, indicating that responses were not dependent on flock size or role.

The majority of responses from both types of organisations were supportive, however:

- Whilst the GFA, NGO, BASC, The Poultry Club of GB and Laid in Britain provided positive responses.
- The BEIC and BPC provided negative responses.

The NFU felt that ‘provided the information is in an anonymous aggregated format, the list could be used to support compensation claims from the EU Commission.’

The Countryside Alliance were supportive and commented that although they accept that in the event of a claim for compensation from the EU, it may be necessary to provide personal details from the Poultry Register to the European Commission. Any provision of details should be limited to those premises covered by the claim and not the entire register.

ADAS had concerns as to the accuracy of the register (validation of data) for this purpose. It was considered that compensation substantiation had been managed successfully to date without the GBPR.

4.4.2 Summary of Responses to Question 4

The majority of respondents from individuals, industry and other organisations supported the proposal to extend the use of the data to provide personal data from the GBPR to the Commission to substantiate a claim for compensation from the EU in the event of disease outbreak.

* The actual number of positive/negative responses to each question is provided at Annex 2

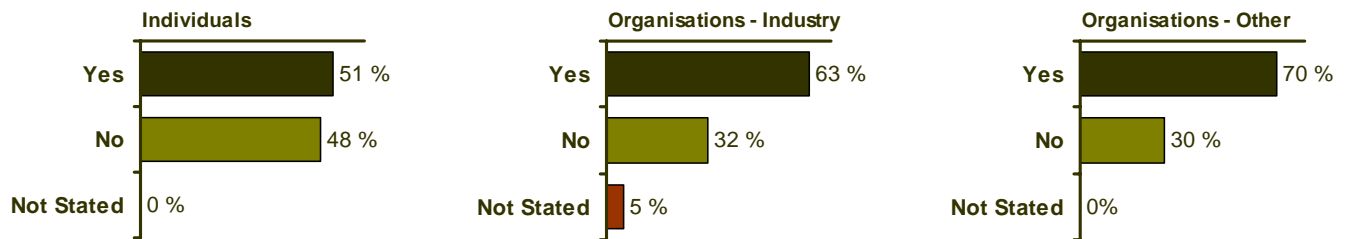
4.5 Question 5

Do you agree that personal data should be used in respect of the baseline surveys, described above (see consultation document), and for surveillance and control programmes, in respect of zoonoses and other endemic diseases of poultry provided, where necessary, there are confidentiality safeguards and personal data will not be published?

4.5.1 Analysis of Responses to Question 5

The majority of proforma responses received from individuals, industry and other organisations were supportive.

Figure 11 Summary of proforma responses to Question 5*



The majority of individuals gave positive responses and there were no clear patterns within the data to suggest that responses were dependent on poultry type, flock size or role. The majority of responses from both types of organisations were also positive:

- The BEIC, BPC, Poultry Club GB, BASC and Laid in Britain provided positive responses.
- The NFU, GFA and NGO provided negative responses.

Most respondents recognised that Defra, its executive agencies and WAG had an ongoing need to work with the poultry industry to carry out surveillance for a number of key animal diseases under domestic and EU legislation. Some examples of further comments included:

The BEIC commented that it would expect Defra or its executive agencies to work with industry in such surveys.

ADAS questioned the integrity of the data on the register and also whether it could provide a sampling frame to generate a random sample.

The Countryside Alliance accepted the use of the Poultry Register in respect of zoonotic diseases and surveys, as this formed an important part of monitoring and preventing disease. This was however on the understanding that access to the data was limited to DEFRA and its executive agencies and WAG, and subject to proper security and safeguards.

4.5.2 Summary of Responses to Question 5

The majority of respondents supported the proposal to extend the use of the personal data in respect of the baseline surveys, and for surveillance and control programmes, in respect of zoonoses and other endemic diseases of poultry provided, where necessary, there are confidentiality safeguards and personal data will not be published.

* The actual number of positive/negative responses to each question is provided at Annex 2

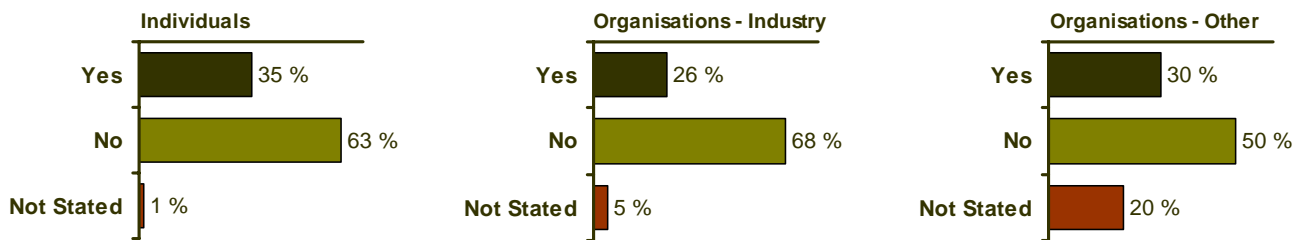
4.6 Question 6

Do you agree that AH should use the personal data on the Register to plan visits to check farm medicine record books and take samples, that will be tested for residues?

4.6.1 Analysis of Responses to Question 6

The majority of proforma responses received from individuals, industry and other organisations were negative.

Figure 12 Summary of proforma responses to Question 6*



Further analysis of proforma responses showed that for individuals, the majority of all respondents gave negative responses except individuals with a flock size of 50 or fewer, which gave a split response.

For industry organisations and other organisations, the majority of responses were negative, however:

- the BEIC and BPC provided positive responses.
- the NFU, NGO, GFA, The Poultry Club of Great Britain, BASC and Laid in Britain provided negative responses.

The BEIC supported this proposal and commented that the 'Lion Code of Practise', set higher standards of both hygiene and animal welfare than is currently required by UK or EU legislation.

ADAS felt that this had been managed successfully to date from existing information sources.

4.6.2 Summary of Responses to Question 6

The majority of responses from individuals, industry and other organisations did not support the proposal to allow Animal Health to use personal data on the GBPR to plan visits to check farm medicine record books and take samples, that will be tested for residues.

* The actual number of positive/negative responses to each question is provided at Annex 2

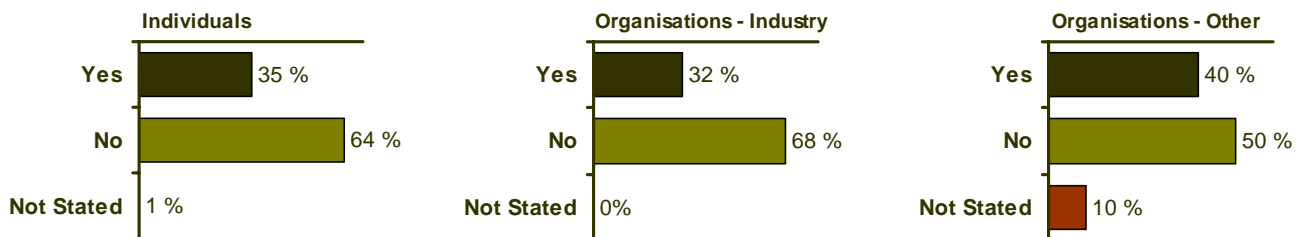
4.7 Question 7

Do you agree that personal data, held on the GB Poultry Register, should be used by Animal Health to plan welfare inspections?

4.7.1 Analysis of Responses to Question 7

The majority of proforma responses from individuals, industry and other organisations were negative.

Figure 13 Summary of proforma responses to Question 7*



Further analysis of proforma responses showed that for individuals, the majority of respondents gave negative responses, except for those individuals with a flock size of 50 or fewer, which gave a split response.

For industry organisations, the responses were mixed. Responses from game organisations were positive, whilst responses from organisations representing the traditional poultry species were split approximately 50:50. The majority of responses from other organisations were negative.

- the BEIC and BPC provided positive responses.
- The NFU, BASC, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain provided negative responses.

The NFU stated 'should Defra decide that the Poultry Register will be used for animal health and welfare enforcement, all reasonable steps must be taken to ensure that list in its entirety is safeguarded...the NFU believes that turning the Poultry Register into an enforcement tool will disenfranchise producers who would otherwise be willing to update information, and generally cooperate voluntarily'.

The BPC commented that the GBPR could be used for tracking the spread of new disease challenges, and for other Defra health and welfare policies although this must be done without any additional data requirement being imposed on those already registered.

The RSPCA supported the use and sharing of data held on the GBPR where the welfare of poultry will be improved, for example, by helping plan welfare visits to poultry farms and assisting in the prevention and control of poultry diseases.

Cage & Aviary Birds on behalf of IPC Media did not agree that it was necessary to use the GBPR to plan routine welfare inspections, as this would amount to unnecessary and costly bureaucracy and that such visits should be rare and made in response to welfare alerts only.

* The actual number of positive/negative responses to each question is provided at Annex 2

4.7.2 Summary of Responses to Question 7

The majority of responses from individuals, industry and other organisations did not support the proposal to allow Animal Health to use personal data held on the GBPR to plan welfare inspections.

Part II – Other Uses Within Defra, Its Executive Agencies And WAG

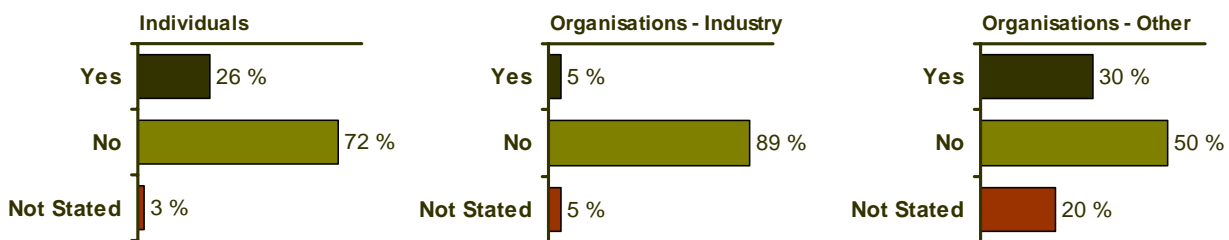
4.8 Question 8

Do you agree that AH and the RPA should have access to the personal data to assist with the selection and the planning of appropriate visits to check that the statutory management requirements of the Single Payment Scheme are being met?

4.8.1 Analysis of Responses to Question 8

The majority of proforma responses from individuals, industry and other organisations were negative.

Figure 14 Summary of proforma responses to Question 8*



Further analysis of the proforma responses showed that although the majority of responses from individuals were negative, those respondents who kept traditional species were actually very supportive (71% positive) whereas individuals which kept game birds were negative (13% positive). The majority of responses from organisations were negative:

- The BEIC, BPC, NFU, BASC, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain all provided negative responses.

ADAS also commented that RPA claimants would already be on the RPA records.

4.8.2 Summary of Responses to Question 8

The majority of responses from individuals, industry and other organisations did not support the proposal to allow AH and the RPA to have access to the personal data to assist with the selection and the planning of appropriate visits to check that the statutory management requirements of the Single Payment Scheme are being met.

* The actual number of positive/negative responses to each question is provided at Annex 2

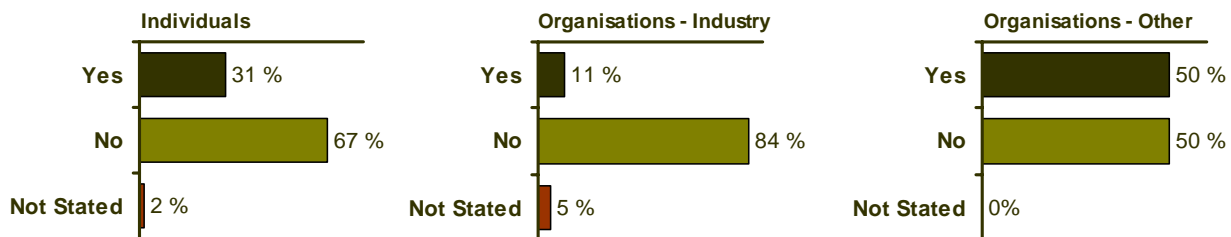
4.9 Question 9

Do you agree that personal data on the GB Poultry Register should be used for effective ad-hoc surveys, provided there are confidentiality safeguards and personal data will not be published?

4.9.1 Analysis of Responses to Question 9

The majority of proforma responses from individuals and organisations representing the poultry industry were negative, but responses from other organisations were split 50:50.

Figure 15 Summary of proforma responses to Question 9*



Further analysis of proforma responses showed that for individual respondents, similar responses were received from all respondent types there were no underlying trends related to poultry type, role type or flock size.

The majority of responses from industry organisations were negative, whereas the responses received from other organisations were equally balanced.

- The BPC supported this proposal.
- The BEIC, NFU, BASC, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain provided a negative responses.

ADAS questioned the accuracy of the data on the register for this purpose given the number of premises and sites covered and the risk of the information becoming out of date.

4.9.2 Summary of Responses to Question 9

With the exception of BPC which was supportive, the majority of responses from individuals and industry organisations did not support the proposal to allow personal data on the GBPR to be used for effective ad-hoc surveys. However, responses from other organisations were equally split.

* The actual number of positive/negative responses to each question is provided at Annex 2

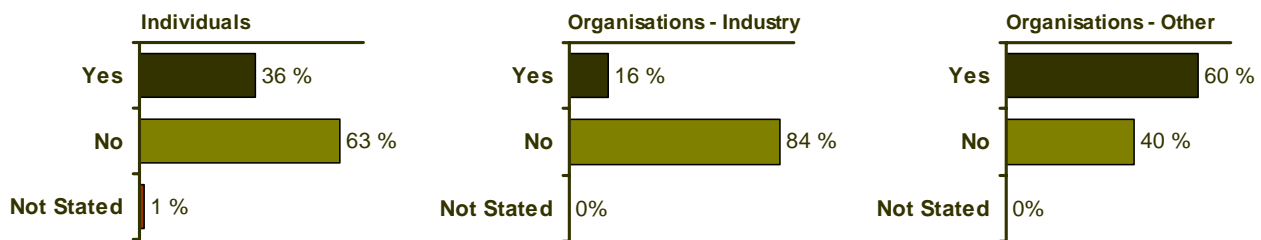
4.10 Question 10

Do you agree that information from the GB Poultry Register can be used to supplement regular agricultural surveys which may result in you not being contacted to complete these in future provided there are confidentiality safeguards and personal data will not be published?

4.10.1 Analysis of Responses to Question 10

The majority of proforma responses received from individuals and industry organisations were negative, but the responses received from other organisations were positive.

Figure 16 Summary of proforma responses to Question 10*



Further analysis of proforma responses showed that for individuals, the majority of respondents provided negative responses regardless of poultry type, flock size or role.

The majority of responses received from industry organisations were negative but the majority of responses received from other organisations were positive.

- The BPC provided a positive response.
- The BEIC, NFU, BASC, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain provided a negative response.

4.10.2 Summary of Responses to Question 10

The majority of responses from individuals and organisations representing the poultry industry did not agree that information from the GBPR could be used to supplement regular agricultural surveys, however the BPC and organisations representing other sectors did support this proposal.

* The actual number of positive/negative responses to each question is provided at Annex 2

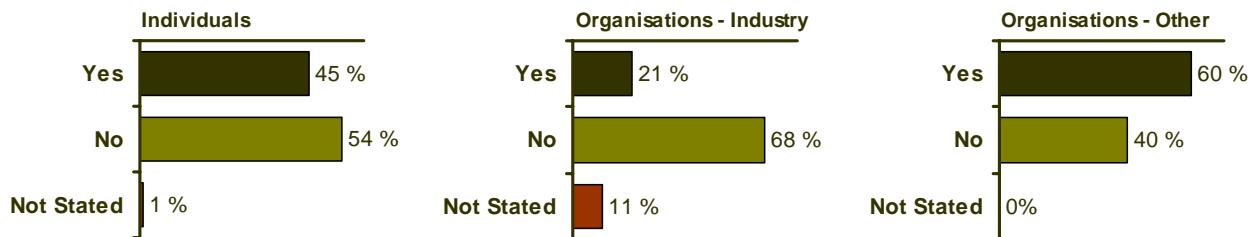
4.11 Question 11

Do you agree that **Defra's and WAG's** statisticians and economists could use personal data on the Register to inform their work, on the understanding that any published analysis did not identify individuals or their farm(s)?

4.11.1 Analysis of Responses to Question 11

The majority of proforma responses received from individuals and industry organisations were negative, but responses from other organisations were positive.

Figure 17 Summary of proforma responses to Question 11*



Further analysis of proforma responses showed that although the majority of individuals provided a negative response, individuals which kept traditional poultry were more supportive (51% positive) than those who kept a mix of poultry types (41% positive) and game poultry (38% positive). Individuals who kept 50 or fewer birds were also more supportive (58% positive).

The majority of responses from industry organisations were negative, but the majority of responses from other organisations were positive.

- Laid in Britain provided a positive response.
- The BEIC, BPC, NFU, The Poultry Club of Great Britain, GFA, NGO provided negative responses.

Although the NFU provided a negative response to this question about the use of personal data on the register, they did approve of the register being made available to Defra and Animal Health offices in an aggregated format for statistical analysis.

The BPC also did not support this proposal for the use of personal data, but supplemented their response with the comment that the GBPR was a very useful resource for aggregated poultry sector statistics and that they would want Defra to maintain it as an up-to-date resource.

The majority of responses from other organisations did support this proposal. ADAS commented that there should be a commitment to undertake regular updating and verification of the GBPR to overcome the risk of skewed conclusions being drawn.

* The actual number of positive/negative responses to each question is provided at Annex 2

4.11.2 Summary of Responses to Question 11

Other organisations and individuals which kept traditional poultry species, did support the proposal for Defra's and WAG's statisticians and economists to use personal data on the register to inform their work. However, the majority of responses from individuals and industry organisations did not agree, although notably the NFU and BPC acknowledged that it could be a useful source of aggregated statistics for this purpose.

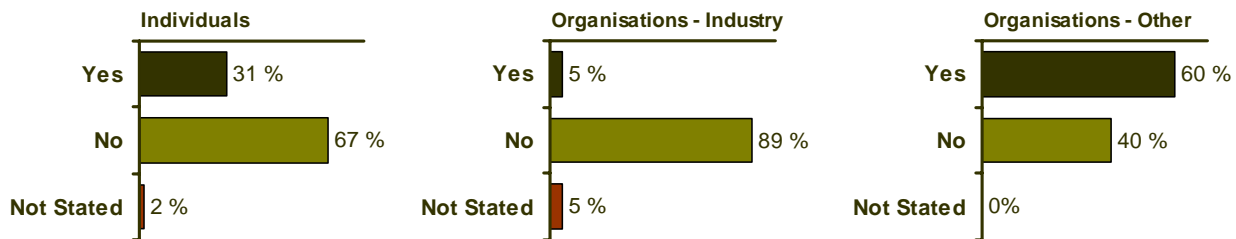
4.12 Question 12

Do you agree that statisticians and economists, under **contract to undertake work for Defra and WAG**, (and subject to a confidentiality agreement) could use personal data on the Register to inform their work, on the understanding that any published analysis did not identify individuals or their farm(s)?

4.12.1 Analysis of Responses to Question 12

The majority of proforma responses from individuals and industry organisations were negative although responses from other organisations were positive.

Figure 18 Summary of proforma responses to Question 12*



Further analysis of proforma responses showed that for individual respondents, all respondent groups (regardless of poultry type, flock size and role) provided negative responses.

The majority of responses received from industry organisations were negative, but the majority of responses received from other organisations were positive.

- The BEIC, BPC, NFU, BASC, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain provided negative responses.

4.12.2 Summary of Responses to Question 12

The majority of responses from individuals and industry organisations did not agree that statisticians and economists, under contract to undertake work for Defra and WAG, could use personal data on the GBPR to inform their work, even on the understanding that any published analysis did not identify individuals or their farm(s). However the majority of other organisations did support this proposal.

* The actual number of positive/negative responses to each question is provided at Annex 2

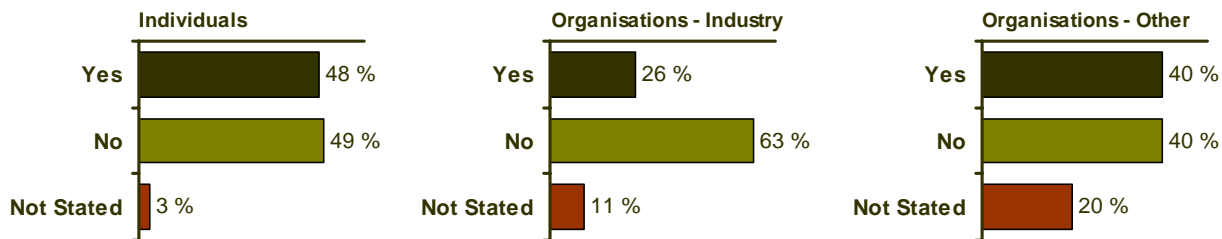
4.13 Question 13

Do you think it would be helpful if the 'one stop shop' concept applied to your dealings with Defra, its executive agencies and WAG in respect of your statutory obligations?

4.13.1 Summary of Responses to Question 13

The majority of proforma responses from industry organisations were negative but the overall responses received from individuals and other organisations were neutral.

Figure 19 Summary of proforma responses to Question 13*



Further analysis of proforma responses showed that traditional poultry keepers were more supportive (55% positive) than other poultry types, and also that there was another trend associated with flock size. Individuals who kept 50 or fewer birds, and between 50-999 birds were supportive of this proposal (62% and 50% positive respectively).

The majority of responses received from industry organisations were negative, but the responses received from other organisations were equally split.

- Laid in Britain Ltd, Poultry Club of Great Britain and BASC provided positive responses.
- The NFU, GFA, NGO provided negative responses.

The Poultry Club of Great Britain commented that the nature of poultry and the difference in the numbers of birds kept is vast and whilst a 'one stop shop' approach could well be of benefit to the commercial world, it still needed to be able to separate the two types of poultry keepers in order to cater for such a huge contrast in situations.

BASC supported attempts to improve Defra's response to tackling diseases and the 'one stop shop' concept may have a role in this, subject to further clarification. They would need reassurance that any proposals would not compromise the interests of their membership and that robust safeguards are in place.

4.13.2 Summary of Responses to Question 13

The majority of responses from industry organisations did not support the 'one stop shop' proposal, although individuals and other organisations gave more evenly divided opinions.

* The actual number of positive/negative responses to each question is provided at Annex 2

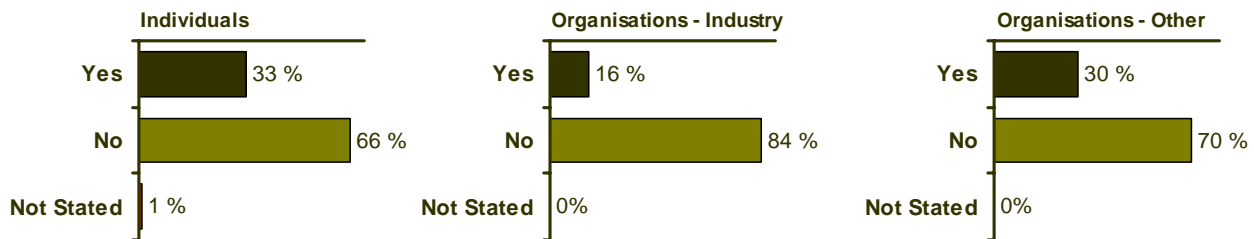
4.14 Question 14

Would you be content to allow Defra and WAG to use the information held on the GB Poultry Register in a similar way as data on the Census so that Defra and WAG could send details of information or invitations to Defra and WAG events which may be of interest to you?

4.14.1 Analysis of Responses to Question 14

The majority of proforma responses from individuals, industry and other organisations were negative.

Figure 20 Summary of proforma responses to Question 14*



Further analysis of the proforma responses showed that for individual respondents, all groups (regardless of poultry type, flock size or role) provided negative responses.

The majority of responses received from industry organisations and other organisations were also negative.

- BASC provided a positive response.
- The BEIC, BPC, NFU, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain provided negative responses.

CAGE & Aviary Birds commented that although the request to use the details on the register to send out general Defra information and invitations to events is helpful, and one which they would support, care should be taken not to disclose information other than a name and address as they did not consider mailing houses secure.

4.14.2 Summary of Responses to Question 14

The majority of responses from individuals, industry and other organisations were not content to allow Defra and WAG to use the information held on the GBPR in a similar way as data on the Census so that Defra and WAG to send details of information or invitations to Defra and WAG events.

* The actual number of positive/negative responses to each question is provided at Annex 2

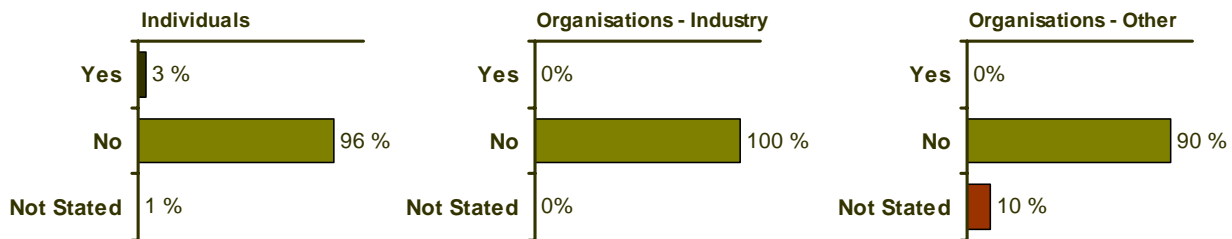
4.15 Question 15

Would you welcome use of GB Poultry Register personal data to facilitate mail-shots from commercial companies?

4.15.1 Analysis of Responses to Question 15

The majority of proforma responses from individuals, industry and other organisations were negative.

Figure 21 Summary of proforma responses to Question 15*



Further analysis of proforma responses showed that for individual respondents, negative responses were received from all respondent types regardless of poultry type, role type or flock size

The majority of responses from industry organisations and other organisations were also negative.

- The BEIC, BPC, NFU, BASC, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain provided negative responses.

The NFU commented 'we also feel that under no circumstances should the register be used for any commercial purposes, like mailings by veterinary or pharmaceutical companies.'

The Poultry Club of Great Britain said that their members were expressly concerned about personal information being passed to commercial companies.

4.15.2 Summary of Responses to Question 15

The majority of responses from individuals, industry and other organisations did not support the use of GBPR personal data to facilitate mail-shots from commercial companies.

* The actual number of positive/negative responses to each question is provided at Annex 2

Part III – Uses By Other Government Departments And Non Departmental Public Bodies

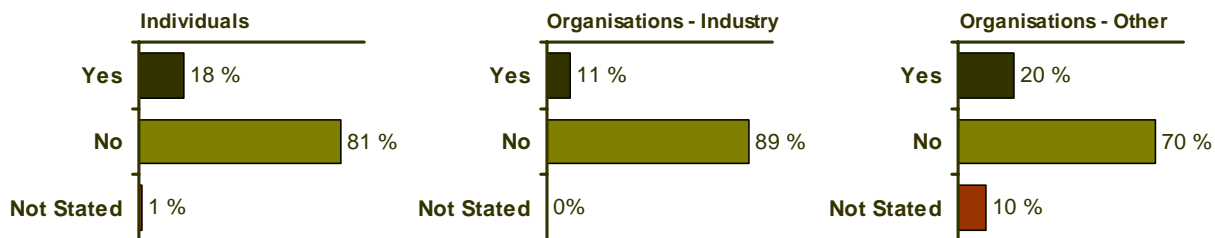
4.16 Question 16

What are your views on personal data held by Defra and WAG on the GB Poultry Register being made available to other government departments or a NDPB such as Environment Agency so that concerns about public health or the environment can be addressed. Do you consider that this would be a good use of the personal data held on the GB Poultry Register?

4.16.1 Analysis of Responses to Question 16*

The majority of proforma responses received from individuals, industry and other organisations were negative.

Figure 22 Summary of proforma responses to Question 16



Further analysis of the proforma responses showed that for individual respondents, similar negative responses were received from all respondent types, regardless of poultry type, role type or flock size.

The majority of responses from industry organisations and other organisations were also negative.

- The BEIC, BPC, NFU, BASC, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain all provided negative responses.

The BPC said that they do not advocate personal data on the GBPR being made available to other departments or agencies for unrelated subjects and policies, such as the Environment Agency for IPPC. They added that the register was conceived, and confidential data amassed, as a tool for disease control and management. Altering this so that it becomes a tool for different or unrelated policies would undermine the basis on which the information is collected.

4.16.2 Summary of Responses to Question 16

The majority of responses from individuals, industry and other organisations did not support the proposal that personal data on the GBPR could be made available to other

* The actual number of positive/negative responses to each question is provided at Annex 2

government departments or NDPBs such as the Environment Agency so that concerns about public health or the environment can be addressed.

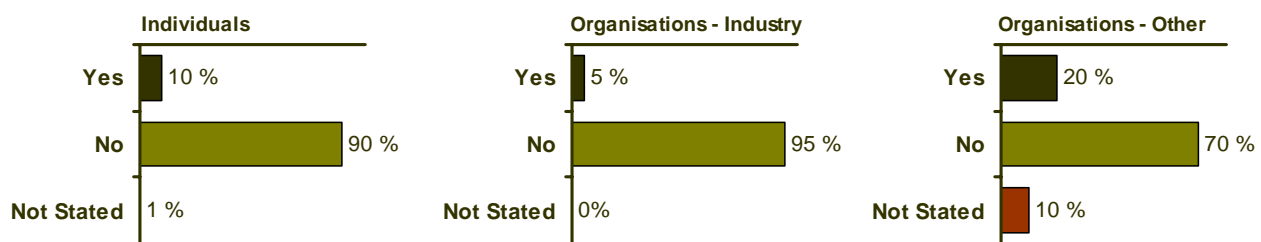
4.17 Question 17

What are your views on personal data held by Defra and WAG on the GB Poultry Register being made available to NDPBs or other government departments such as HM Revenue and Customs when there is good reason to do so and provided that any information sharing is in line with UK privacy and data protection laws. Do you consider that this would be a good use of the personal data held on the GB Poultry Register?

4.17.1 Analysis of Responses to Question 17

The majority of proforma responses received from individuals, industry and other organisations were negative.

Figure 23 Summary of proforma responses to Question 17*



Further analysis of the proforma responses showed that for individual respondents, similar negative responses were received from all respondent types, regardless of poultry type, role type or flock size.

The majority of responses received from industry organisations and other organisations were also negative.

- The BEIC, BPC, NFU, BASC, The Poultry Club of Great Britain, GFA, NGO and Laid in Britain all provided negative responses.

In addition to the comment provided by the BPC in response to question 16, there were further concerns from a number of individuals, industry and other organisations regarding the security of the data should it be passed to other government departments.

4.17.2 Summary of Responses to Question 17

The majority of responses from individuals, Industry and other organisations did not support the proposal that personal data held on the GBPR being made available to NDPBs or other government departments such as HM Revenue and Customs when there is a good reason and any information sharing is in line with UK privacy and data protection laws.

* The actual number of positive/negative responses to each question is provided at Annex 2

Annex 1 – List of Respondents

The largest proportion of responses from organisations came from those representing the livestock industry and farmers or keepers of animals. This was followed by organisations representing research, commercial, animal welfare and veterinary.

Representatives of the Poultry Industry (Industry Organisations)

Acona Club and Buff Orpington Club
Anonymous Industry Representative (wished to remain unknown)
Aviornis U.K.
British and Irish Association of Zoos and Aquariums
British Association for Shooting and Conservation (BASC)
British Egg Industry Council (BEIC)
British Poultry Council (BPC)
British Waterfowl Association
Country Land and Business Association
Farmoor Services LLP
Game Farmers Association (GFA)
Home Shire Growers
Indian Runner Duck Association
National GameKeepers Organisation (NGO)
National Farmers Union
Peter Greenwood & Co
Scots Dumpy Club
The Poultry Club of GB
UK Egg Producers association LTD and Laid in Britain LTD Producers

Representatives of Other Sectors (Other Organisations)

Adas UK LTD
Animal Aid
Association of Vets in Industry
Carlisle City Council, Greenspaces Team
Countryside Alliance
Farm Crisis Network
IPC Media (comment only)
The Arthur Rank Centre
The Indian Game Club (comment only)
RSPCA
Trading Standards Institute
Vega Research

Annex 2 – Number of Responses to Each Question

This table summarises the responses received to all the questions in the consultation letter. Answers are categorised by Individual, Industry Organisation or Other Organisation and by whether the respondent said “Yes”, “No”, or “Not Stated”.

Question	Yes			No			Not Stated		
	Individuals	Organisations - Industry	Organisations - Other	Individuals	Organisations - Industry	Organisations - Other	Individuals	Organisations - Industry	Organisations - Other
1	243	16	10	74	3	0	2	0	0
2.a	187	9	9	129	8	1	3	2	0
2.b	200	11	10	108	7	0	11	1	0
3.a	140	5	8	175	13	2	4	1	0
3.b	137	7	8	170	12	2	12	0	0
4	179	11	6	136	8	3	4	0	1
5	164	12	7	154	6	3	1	1	0
6	113	5	3	202	13	5	4	1	2
7	113	6	4	204	13	5	2	0	1
8	82	1	3	229	17	5	8	1	2
9	99	2	5	215	16	5	5	1	0
10	115	3	6	200	16	4	4	0	0
11	144	4	6	172	13	4	3	2	0
12	99	1	6	214	17	4	6	1	0
13	153	5	4	157	12	4	9	2	2
14	106	3	3	210	16	7	3	0	0
15	11	0	0	306	19	9	2	0	1
16	58	2	2	258	17	7	3	0	1
17	31	1	2	286	18	7	2	0	1