



**COUNCIL OF
THE EUROPEAN UNION**

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**AGRILEG 148
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ADDENDUM TO NOTE

from:	General Secretariat of the Council
to:	Delegations
No. Cion prop.:	13700/11 - COM(2011) 525 final + 13701/11 - COM(2011) 524 final
Subject:	- Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 1760/2000 as regards electronic identification of bovine animals and deleting the provisions on voluntary beef labelling - Proposal for a Directive of the European Parliament and of the Council amending Council Directive 64/432/EEC as regards computer databases which are part of the surveillance networks in the Member States

Further to the meeting of the Working Party of Veterinary Experts (Animal Health) on 29 November 2011, delegations will find attached comments from the Finnish delegation on the above issue.

16733/11

Finland cannot support the amendment in article 1 paragraph 2 third indent therefore Finland would suggest that paragraph 2 is deleted from the proposal. It is sufficiently well indicated whether there are animals electronically identified in a holding, because it is set down a proposal of an obligation in the first paragraph of the same article to record the type of electronic identifier in the database individually for each animal.

16732/11

General comment

As Finland already in the meeting pointed out that when there is a provision empowering the Commission to adopt delegated acts the empowerment should be in force only for a limited time period of 5 - 7 years.

Article 4c

Finland would like to express a concern of the wording in article 4c paragraph 2 in the sentence: "For reasons related to the physiological development of the animals, that period may be extended to up to 60 days of age for the second mean of identification." The wording gives an impression that the animal could be sent out identified with just one identifier, because it is given a longer time frame to identify the animal with the second means of identification in the holding of destination. Irrespective whether the MS of destination has introduced a compulsory electronic identification or not the animal has to be identified with two means of identification before leaving the holding of birth. Thus the arriving animal is already identified with two conventional ear tags and in the holding of destination only one of the ear tags should be replaced by an electronic identifier. Therefore Finland would suggest that the wording of the sentence in question would be modified as follows:

For reasons related to the physiological development of the animals, that period may be extended to up to 60 days of age.