



THE BRITISH DRIVING SOCIETY LTD.

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**BDS Response to
Draft Regulations on the Identification of Equidae
Update on developments and urgent consultation dated 20 4 07**

The British Driving Society's response to the urgent Consultation issued by DEFRA on 20th April 2007 is as follows :

Microchips

We strongly support DEFRA's position that microchips should remain voluntary, certainly for semi-feral equidae. We can see no practical purpose in requiring owners of non-commercial equidae to microchip their animals. Very few equidae go for slaughter for human consumption in the UK – most are euthanased or die at home. Making private owners microchip their animals puts an unnecessary financial burden on hundreds of thousands of horse owners.

We have previously expressed, in the strongest possible terms, our opposition to the previous Commission proposal that owners be required to remove microchips from dead horses, even where horses die or are euthanased at home. We reiterate that we consider requiring owners to remove a microchip from a horse which has not been sent for slaughter for human consumption is totally pointless, since horses euthanased at home will not enter the human food chain. That it would be an unnecessary expense on the owner to have the vet remove the microchip. That it would be unnecessarily distressing to the owner (especially where many UK horses are family pets) to have their dead horse cut about. Where the owner is unable to afford the additional vets fees, it is totally unacceptable to expect anyone to carve up their dead horse in an effort to find a microchip.

PATRON : HRH THE PRINCE PHILIP, DUKE OF EDINBURGH, KG, KT

PRESIDENT : J CORBETT

TO PROMOTE INTEREST IN ALL ASPECTS OF EQUINE DRIVING



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Hot Branding

Whilst we recognise that some method of physical identification is desirable, we are concerned that hot branding might result in considerable controversy. It is highly likely that animal rights groups would make a great deal of mileage out of the concept of 'burning little foals, scarring them for life', etc. As our native foals are exceptionally 'cute', and as the general public conception is of them living wild and free in the New Forest, etc, hot branding could become a very unpleasant issue.

Saying 'the EU insist that we hot brand foals' is hardly likely to endear the Commission to the general public – if anything is likely to make the British public anti-EU, it is the suggestion that the EU insist on 'torturing innocent little British ponies so the French can eat horsemeat' ! It is so easy to make hot branding an emotive issue.

What are the implications of hot branding under the Animal Welfare Act 2006 – presumably it comes under the heading of 'mutilation'.

What are the problems with freeze branding, which is much more publicly acceptable – if the argument is that freeze brands can be altered, then how much more difficult is it to alter hot brands ?

What about lip or ear tattoos ?

Keepers instead of owners being responsible for Passports

We strongly oppose this on the grounds that :

- How do you define a 'keeper' ?
- Will this be someone who is looking after the horse whilst the owner is on holiday for a couple of weeks ?

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- Will this be the owner of land on which a horse owner has the tenancy to graze a group of miscellaneous horses – in this case, the landowner will have to constantly monitor the identity of each horse grazing on the land.
 - What is the horse owner supposed to do if the horse needs veterinary treatment, and the keeper is away for the weekend, so the Passport is unavailable ?
 - What is the horse owner supposed to do if they want to sell the horse, and the keeper is unavailable to supply the Passport ?
 - Will a livery yard owner become responsible for obtaining and amending passports for all horses in their care ? In which case -
 - How is a keeper supposed to know if the horse owner's details change
 - How will owners and keepers resolve the situation if the horse is jointly owned by a married couple who divorce and each claim the horse ? This puts the keeper (especially a livery yard or landowner) in an impossible position.
 - If the owner dies, how will the keeper be responsible to his/her estate for the passport ?
 - How are PIOs supposed to know who is the keeper of the horse at any given time ? The ownership of the horse only changes upon sale or gift of the horse, but an owner may move livery yards on a regular basis (and some do).
 - What will be the position where a horse is seized on welfare grounds ? Will this allow abusive or negligent owners to duck out of their responsibilities, simply by persuading some unwary person to be the ' keeper' ?

We agree with DEFRA that making the keeper responsible will cause enormous confusion, and will put a huge, unnecessary burden upon owners, keepers and on PIOs.

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Register of Equine Holdings

The BDS is completely unconvinced of the necessity of registering equine holdings in this context. Registering equine holdings will not, in itself, prevent the spread of infection.

Whilst we are aware of the potential problems of infectious diseases such as African Horse Sickness entering the UK, we feel that this is not the way to deal with the issue.

More stringent controls over horses entering the UK from areas of actual or potential infection would be more useful. Vaccination programmes are also more viable and useful – equine ‘flu was a major problem in the UK until the very robust vaccination programme was adopted. If equidae can be vaccinated against ‘hot weather’ infections and diseases, then they will cease to become a problem.

It would be more useful if the Commission provided funding for robust national vaccination programmes, rather than to waste time and effort by trying to address the problem by means of bureaucracy.

Most commercial establishments are already registered with either their local council, the British Horse Society, British Driving Society, Harness Horse Training Board, British Horseracing Board, etc. There would not seem to be any major problems with sharing this information with DEFRA, should the need arise.

Creating yet another register is putting an unnecessary burden on the commercial horse sector.

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In any case, a commercial horse is no more likely to contract or spread infection than a privately owned horse. Indeed, privately owned horses make more journeys – to local horse shows, etc – than commercially-owned horses.

To register all private equine holdings would be enormously expensive – presumably the burden for this will fall on PIOs, who will have to yet again make a charge to horse owners and keepers – and will lead to accusations that DEFRA/PIOs are just trying to make money out of the private horse sector.

Owners already have to notify a change of address to their PIO, for which they are charged an administration fee. Most people keep their horses relatively close to where they live; what will a Register of Equine Holdings achieve that this requirement does not ?

Rather than put a blanket burden on the whole horse sector, it would be more cost-effective and more practical to simply require horse owners to notify DEFRA if they have a horse living within an infection-control area when the need arises.

The horse sector would also be much more likely to support DEFRA in an obvious effort to control infection as and when it occurs, rather than to be constantly notifying DEFRA every time they move a horse to a new place.

Equine Holdings – lists of horses entering and leaving premises

The BDS oppose this measure in the strongest possible terms. What possible useful purpose could such lists serve ?

For commercial horse owners, this is a totally unnecessary burden in terms of paperwork and cost, and absolutely pointless.

For private horse owners it is unnecessary, burdensome and would almost certainly constitute an invasion of their privacy.

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For horse shows and similar events – which would, presumably, also have to keep separate lists of horses entering and leaving the showground - it is putting a further administrative burden upon their resources.

If the purpose is disease surveillance, the Commission might just as well require that every person coming into contact with a horse, pony, donkey or mule be put onto a list, since human contact is just as likely to spread disease between horses. Thus, everyone attending every race meeting, horse show, riding school, horse sanctuary to pat a pony, etc, would need to be identified. Perhaps it would be easier for the Commission to just eradicate the horse.

Who is going to verify the accuracy of such lists ? Does DEFRA have the resources to visit hundreds of thousands of private horse owners to inspect their diaries ? Or will the Commission finance this ? How will enforcement officers know if the lists are accurate ?

If a list is proved to be inaccurate, what penalties will be enforced ? Are we going to lock people up or fine them if they forget to note down every time they go for a ride or drive ?

What will happen if the son or daughter of a horse owner takes the horse out for a ride without informing their parents ? Will the child be subject to some kind of equine ASBO ?

' Unpopular' is an understatement. In the wider public context, it is on a par with requiring the public to make a note of every time they take the dog for a walk. This will be seen as the EU and DEFRA meddling in the private lives of ordinary people – there are far more privately-owned horses that commercial horses in the UK.

We strongly support DEFRA in opposing this measure.

John A Parker
Chairman, British Driving Society
4th May 2007.

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