



THE BRITISH DRIVING SOCIETY

83, New Road, Helmingham, Stowmarket, Suffolk, IP14 6EA

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The British Driving Society response to consultation on Delivering Good Animal Welfare

The British Driving Society (BDS) is the national organisation responsible for all harness and carriage horse* driving in the UK. The BDS was formed in 1957 as a non-profit-making organisation, administered by a governing Council elected from the Membership. The basic remit of the BDS is to promote interest in equine carriage driving and equine welfare. Anyone, whether a BDS Member or not, can benefit from BDS education, training and assessment, and we welcome inquiries from non-Members interested in harness horse driving or in horse care and welfare.

In recent years, the BDS has become involved with many more diverse areas of the horse sector, and we help to represent the interests to Government of equine welfare organisations, charities and horse rescue homes, Driving for the Disabled Association, British Horse Driving Trials Association, British Miniature Mediterranean Donkey Association and the British Mule Society, to name but a few.

The BDS is a DEFRA-approved Horse Passport Issuing Organisation. We currently have over 21,000 equines on our database. We are also a DEFRA-Approved Awarding Body for the Welfare of Animals (Transport) (Equines) Order 2006 Certificates of Competence for horse transport drivers and attendants (NVQ Levels 2 and 3).

The BDS operates the Harness Horse Training Board's Code of Practice for Commercial Carriage Drivers on the Public Highway under the auspices of the Department of Transport.

We have a very robust education and examination structure, offering training and education for anyone interested in horse care, welfare and management, plus safe, humane and BDS-approved horse training methods and driving techniques and skills. Our education and examination structure is open to anyone, whether they are BDS Members or not.

- 'Horse' means 'horse, pony, donkey or mule' throughout
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TO PROMOTE INTEREST IN ALL ASPECTS OF EQUINE DRIVING



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We have over 50 Light Harness Horse Instructors and Assessors, based throughout the UK. Our Area Commissioners organise group training days for all levels, especially for people new to horses.

We offer the following Education and Examination programme :

- **BDS Preliminary (NVQ Level 2)** – basic horse care, management and welfare. Basic harness horse driving. Fitting the harness and vehicle for the comfort and safety of the horse. Safe driving techniques
- **BDS Road Driving Test (NVQ 2)** – a basic safety test, under the auspices of the Department for Transport, designed to help people achieve a good standard of safety when driving on the public highway.
- **BDS Intermediate (NVQ 3)** – next level of horse care, management and welfare. Next level of harness horse driving, pairs driving, training and schooling the harness horse (there are a number of optional specialist modules included with this level).
- **BDS Advanced (NVQ 4)** – advanced horse care, management and welfare, advanced harness horse driving, advanced pairs driving, tandem and team driving (a number of optional specialist modules are included with this level).
- **BDS Preliminary Teacher's Certificate (NVQ 4)**- basic teaching certificate
- **BDS Light Harness Horse Instructor's Certificate (FE)** – full Instructor's certificate for teaching the above levels of harness horse driving
- **BDS Sports Coach Certificate (NVQ 4)** – Instructor/coach certificate for teaching and coaching for harness horse competitions, horse driving trials, etc.
- **WATOs Attendants Certificate (NVQ 2)** – Welfare of Animals in Transport certificate of competence for attendants/grooms for those responsible for the care, safety and welfare of horses being transported by road
- **WATOs Drivers Certificate (NVQ 3)** – Welfare of Animals in Transport certificate of competence for drivers of motor vehicles transporting horses by road.

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- **HHTB** – Harness Horse Training Board Assessment for commercial operators of harness horses on the public highway – Department for Transport Code of Practice, required by Local Authorities for the purpose of granting hackney carriage and similar licences to carry fare-paying passengers, and by many insurance companies for public liability insurance.

INTRODUCTION

Whilst horses are not normally regarded as a food animal in the UK, it is estimated that around 10,000 equines enter the human food chain via equine-licensed slaughterhouses each year, mostly for export as carcasses to European countries. There are around 1.5 million horses in the UK, the vast majority of which are kept by private owners for non-commercial purposes. Since the majority of these 'pet' horses will be humanely euthanased at home at the end of their lives, the issue of farm assurance schemes, meal labelling, etc, are not really applicable to horses, although we support legislation and Codes of Practice for the best possible treatment of all animals before and during slaughter.

In addition, Section IX of the Horse Passport provides the facility for the owner to opt for a horse to be either available for slaughter for human consumption or not available for slaughter for human consumption. The overwhelming majority of the 21,000 Horse Passports issued by the BDS exclude the horse from availability for slaughter for human consumption.

Although horses are not normally slaughtered for meat in the UK, they are regularly used for riding, driving, racing, competing, showing, breeding, teaching, exhibition and display by both commercial and non-commercial owners, keepers and trainers. It is estimated there are 2.5 million horse owners, keepers and users in the UK, 150,000 employed in equestrianism, and that the horse industry is worth approximately £4 billion per year.

It is necessary to address animal welfare issues relating to such a large number of animals, especially as horses are exceptionally long-lived, compared to farmed livestock and other domestic pets. The average horse will, if properly cared for, live well into his 20s or even early 30s, and it is not uncommon for ponies, donkeys and mules to live to 35 or 40 years old. This is a huge commitment in terms of time, expense, responsibility, commitment and care for both commercial

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and non-commercial users. Each horse which achieves a full life-span will also have contributed a very considerable amount of income into the whole horse sector.

Horses have quite complex and specific requirements, and ideally need to be monitored and maintained on a daily basis. It is equally important that humane and approved training and handling techniques are used, and that horse users are aware of such methods.

The new Welfare of Animals in Transport legislation has gone a long way to improving the welfare of horses in transport. Whilst there is no significant welfare issue in equine transport within the UK, this is certainly not the case in much of Europe, and we welcome the provisions in so far as they address the issue of horses being transported for sale or slaughter.

The BDS has demonstrated its ability to work with Government, participating in consultations, helping to disseminate information to the horse world, processing large quantities of information, assessments, training sessions, verifications, inspections and databases in respect of Horse Passports, HHTB Assessments and WATOs Certificates of Competence.

We are willing to continue to work with Government to promote equine welfare and wish to be an integral part of the on-going process.

Question 1

1.1 Does the scope cover the right ground ?

We consider the proposed scope broadly covers the right ground

1.2 Is it right that it applies only to vertebrate animals ? What other groups should be covered and why ?

The BDS has no expertise with, and therefore no official opinion regarding, non-vertebrate species. It is our general position that we would support measures designed to ensure all living creatures can enjoy a reasonable quality of life commensurate with their species

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Question 2

2.1 Is the vision sufficiently challenging and aspirational ?

Yes

2.2 Is the word ' care used here sufficiently strong ?

We consider the use of the word ' care' is sufficiently strong and appropriate. It has the virtue of simplicity in terms of being clear and easily understood by everyone; it is sufficiently all-embracing for the purpose, and avoids tortuous and potentially draconian terms and phrases

2.3 Is the emphasis on the responsibilities of individual animal keepers right ?

It is appropriate that individual keepers are responsible for the animals in their care. Any person keeping animals, whether commercially for the purpose of sport, competition or exhibition or as a pet, has the primary responsibility for the welfare of their animals

Question 3

3.1 To what extent will the proposed new approach help to improve achievement of a good standard of animal welfare ?

Any proposals aimed at achieving improvement of animal welfare are to be welcomed. Providing DEFRA, animal breeding, performance and species-specific societies, animal welfare organisations, commercial users of animals, and those involved in the use and sale of animals can work together on common aims, there is every reason to suppose that the objectives will be achieved.

However, it is also important not to place such burdens on animal owners, keepers and users that they are put-off keeping animals altogether. This would be totally counter-productive in terms of welfare. It would be very difficult to encourage people to take an interest in animal welfare if

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legislation makes it nearly impossible for them to own, keep, use or interact with animals.

Whilst rules and regulations might satisfy the desire to regulate animal welfare in the commercial sector, they are likely to make private owners, keepers and users reluctant to keep, own or interact with animals.

The result would be less animals, or only pedigrees and high-performance sporting animals, which are beyond the means, capabilities and interest of the ordinary pet owner. Whilst less animals would mean less welfare issues, it would also mean less general public interest and knowledge. If the general public were to cease to be interested in animals, then organisations which are presently the custodians of species-specific knowledge and experience will cease to exist.

Less interest equates to less knowledge and experience, which equates to poorer standards of animal welfare, which is exactly what we were all trying to address in the first place.

We consider Codes of Practice and access to information and education are the most effective and user-friendly tools with which to improve animal welfare. It is important that species-specific organisations are closely involved with and, where appropriate, have control over welfare issues relating to the species in which they have expertise.

3.2 Which of the proposed alternative delivery mechanisms would be most successful in your view ? Can you suggest any others ?

a) As horses are not normally regarded as food animals in the UK, we do not see a role for food-assured standards with regard to equines, although we consider that the highest possible standards of welfare, care and humane methods prior to and during slaughter should be maintained at all UK slaughterhouses

b) The BDS consider that robust Codes of Practice are the best way ahead for achieving good standards of animal welfare in the commercial, sporting, breeding and performing sectors

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c) Whilst legislation has the virtue of prosecuting those who deliberately or negligently abuse or neglect animals, it also has the effect of putting considerable burdens on all animal owners, keepers and users. Many people keep animals in conditions which have no welfare implications, even though such conditions may be idiosyncratic to the particular owner, Keeper, user or animal, and may not fall within the vision of legislation.

d) It would be neither practical nor would it contribute significantly to animal welfare to impose onerous standardised conditions, just for the sake of making legislation, where no significant welfare issues exist to be addressed.

e) It is, of course, reasonable to require that every animal is given sufficient food to maintain a good bodyweight (according to its species, age, etc) and that they have access to water or other liquids appropriate to the species. It is also reasonable to require that animals have housing or shelter, freedom of movement and access to companionship (whether animal or human) appropriate to their species, age, health and general condition. It is also reasonable to require that methods of training, discipline, schooling, exhibiting, competing, showing, breeding, racing, etc, are carried out in a manner which is humane, approved by species-specific expert organisations, and with regard to the animal's welfare and safety.

If these conditions and requirements are contained in Codes of Practice, administered by DEFRA-approved species-specific organisations, then there will be far more flexibility for such organisations to advise and educate to improve and maintain animal welfare. Whilst legislation is invaluable in cases where deliberate, on-going or repeated abuse or neglect is involved, it is not so useful where the issue results from lack of knowledge or lack of understanding

Where lack of knowledge or lack of understanding, rather than intentional abuse or deliberate neglect, has resulted in a welfare issue, it is surely more appropriate for this to be addressed by offering advice or education, rather than criminal prosecution.

Codes of Practice enable expert species-specific organisations to offer advice and education, which will be more likely to improve the welfare of

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the specific animal or animals. This will also help to relieve the burden on animal welfare and rescue organisations, since a significant improvement in individual welfare conditions will mean the animal(s) can remain with the now better-informed owner, keeper or user and will not need to be seized, rescued or re-homed.

In order to be fully effective, Codes of Practice need to be species-specific and purpose-specific if they are to deliver good animal welfare standards coupled with factors relevant to the normal keeping and usage of specific species.

Education, training and advice on all aspects of animal care and welfare is an invaluable resource, and should be obtainable from any stakeholder, sporting or performance governing body, breed society, etc.

We feel we must point out at this stage that education, training and the dissemination of advice are expensive items to deliver, and it is simply not possible for many of the organisations with the greatest expertise to deliver these free of charge.

Education is especially expensive because it requires qualified and experienced teachers, who need to be reimbursed for their time and travelling expenses, plus (certainly in the case of horses) a suitable venue and often competent assistants, etc, all of which costs money. Furthermore, in order to maintain the levels of expertise of Instructors, it is necessary for the teachers themselves to attend courses, seminars, etc, which again incur costs.

Whilst the BDS, in common with all other organisations committed to animal welfare, are extremely keen to provide education and information, none of us the resources to deliver this free to millions of people on a UK-wide basis.

The BDS already offers NVQ Levels 2, 3 and 4 in Preliminary, Intermediate and Advanced horse care, management, welfare and carriage driving, plus the Light Harness Horse Instructors qualification (LHHI).

We are also a DEFRA-Approved Awarding Body for the new Welfare of Animals (Transport) (equine) Certificates of Competence, WATOS, which are NVQ Level 2 for the Attendant and NVQ 3 for the transport Driver, and we inspect commercial

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horse drawn vehicle operators working on the public highway for the Department of Transport's Harness Horse Training Board Code of Practice.

We are able to maintain this level of education on a fee-paying basis at the current level of up-take, but would need to increase our trainers, instructors, assessors and the number of BDS approved training centres if we are to be able to offer education on a nation-wide scale (bearing in mind that the care, welfare and safety requirements are the same, whether ridden or driven).

For example, it is estimated there are 1.5 million horses in the UK; the BDS has over 21,000 registered on database alone. This represents hundreds of thousands of owners and keepers in the horse sector.

Because horses are a large domestic animal with complex and specific needs, it is extremely important that education and information is available to horse owners and keepers. At present, all the costs of education fall upon the horse owner/keeper, and participation in training courses, riding and driving lessons, seminars, lectures, demonstrations, etc, depends upon owners/keepers having sufficient funds to cover the fees.

If stakeholder organisations are to be in a position to deliver a good quality of education to everyone in their respective sectors, then the only way to ensure a significant level of take-up for education and training courses is to offer the incentive of funding to help meet these costs.

It is equally important that everyone delivering education – instructors, assessors and verifiers – have the funding to access training courses to achieve and maintain their own high standards.

Question 4

4.1. Is the proposed balance of responsibilities between Government and stakeholders right ?

the balance of responsibility between Government and stakeholders is sufficient for the purpose

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4.2. would you add or exclude any specific responsibilities from any of the groups ? (please indicate to which group your suggestions refer).

We have pointed out in the context of Welfare in Animal Transport that we regard it as essential that local authority enforcement officers have at least the same basic level of education and training required by the commercial and non-commercial user.

It is somewhat counter-productive if local government enforcement officers are substantially less knowledgeable, less well-educated and less well-qualified than the owners, keepers and users they are inspecting

From the horse sector's point of view, we would like to see local authority enforcement officers given the same opportunities as animal keepers/users to attend species-specific training days, seminars, etc, and the BDS is willing to work with Central Government and Local Authorities to achieve this.

4.3. are the responsibilities proposed by DEFRA reasonable expectations for all animal keepers, including those individuals who purchase and care for their animals on a non-commercial basis (for example, pet owners) ?

It is perfectly reasonable to expect animal owners and keepers, whether commercial or pet owners, to take responsibility for the routine care, welfare and safety of their animals. It is not unreasonable to expect higher standards for animals kept in a commercial context, but it is important to keep a sense of proportion. So long as animals are kept in accordance with the ' 5 freedoms', this does not have to equate to conditions of absolute luxury in order for the animal to be perfectly happy and content.

It is important to recognise the temptation of imposing, over a period of time, increasingly higher standards of living conditions which actually do

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very little to increase the animal's comfort, but are instead prohibitively expensive and burdensome for even the most responsible and caring owners and keepers.

If the burdens upon the commercial owner become so expensive and so restrictive that they are incapable of compliance then their expertise will be lost, which will ultimately be detrimental to animal welfare. It is in the interests of the responsible commercial owner to breed, keep and present for sale animals which are in the best possible condition.

If knowledgeable, responsible commercial owners are driven out of business, then they will inevitably be replaced by those who are not so knowledgeable or responsible, and who avoid compliance, with the result that animal welfare is compromised.

We have already pointed out the pitfalls of imposing too great a burden on pet owners in our answer to Question 3, above.

4.4. Is it reasonable to require consumers of animals and animal products to 'have regard to' the welfare provenance of their purchases ? Here 'have regard to' means 'to consider'

Although as we have already pointed out, horses are not normally eaten in the UK, we would all prefer to think that consumers had some regard to the welfare of the animal products they eat. However it is difficult to know how people could be *required* to consider the welfare provenance of food purchases.

Unless it is proposed there is legislation to make it a criminal offence not to 'consider' the welfare provenance of purchases, where 'intent' could be the determining factor, then it is difficult to see who the mental state of the consumer could be determined, nor what purpose it would serve to do so. It is hardly practical to propose fining or locking people up for purchasing battery farmed eggs, because free-range is by far the better welfare option.

Again, information and education are the key tools to persuading consumers to consider the welfare provenance of their purchases.

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So far as the welfare provenance of live animal purchases is concerned, it seems unreasonable to place the whole burden on the consumer. People selling live animals are most likely to exhibit them in good living conditions and in apparent good health and condition, otherwise they are unlikely to make a sale. It is not reasonable to expect the consumer to turn into a detective, responsible for investigating the welfare provenance of each individual animal prior to purchase.

Furthermore, a caring consumer might well decide to purchase an animal they were concerned about, in order to give it a better life – it would be inappropriate to make legislation which would prevent or make it difficult for them to do so. It is not uncommon, for example, for people to purchase ponies from sales because they believe the animal has been kept in less than ideal conditions, or is destined for slaughter. How exactly would a ***requirement to consider the welfare provenance*** affect this scenario ?

The BDS would like to emphasise that we consider education is the key to delivering and maintaining good standards of animal welfare.

We believe organisations which regulate, interact with and offer species-specific training are in the best position to address welfare issues pertaining to individual species.

We consider that education in animal welfare should be delivered as an optional part of every school curriculum. It is especially important that children do not just learn about rare and endangered species, but also about the British native wildlife and even more importantly about the domestic animals they are most likely to come into contact with.

Education in the care and welfare of animals also helps to teach and reinforce the vital social skills of responsibility and commitment upon which all human society is, ideally, based.

As an organisation primarily concerned with horses, we naturally take the view that horses are a particularly beneficial aid to inspiring interest in acquiring and developing good welfare practices, because of their

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requirements for a fairly rigid daily care routine, and because they provide the most interactive opportunities for training, riding, driving, showing, etc, to a much higher standard than the average domestic pet.

Put simply, the better a horse is cared for, the higher the quality of training, and the more a person is prepared to work to establish a relationship of trust and confidence with the horse, then the more the horse will enjoy life with their owner/keeper/trainer, and the more the owner/keeper/trainer will see the benefits of establishing and maintaining good standards of animal welfare.

Question 5

Which of these principals are the most important ? (eg: can you list the top 3)

The BDS consider it is counter-productive to try to select a ' top three' from the list. Any and all of these conditions are to be actively avoided at all times. Any responsible person will take all reasonable steps to avoid animals suffering hunger, thirst, discomfort, pain, disease, fear and distress, and will allow animals to express their natural behaviour wherever possible.

However, even the most experienced, responsible and caring person cannot guarantee that a water bowl will not be tipped over, nor that an animal will not inadvertently hurt itself or suffer discomfort, pain and distress caused by illness or external factors beyond the control of the keeper. Similarly, it is not always possible to allow animals to ' express natural behaviour' at all times. Taken literally, this could make it difficult to enforce the laws preventing organised dog fights, badger-baiting, cock fighting, etc, because it could be argued in defence that they are merely being given the opportunity to express ' natural behaviour'.

It is the deliberate, negligent or excessive degree of these items which are the issues, and the BDS again points out that education, coupled with the opportunity to interact with animals, are the best ways of addressing these issue, and that education is most effective when delivered at a reasonably early age.

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Question 6

To what extent will improving the quality, coverage and penetration of information/training/education available to animal keepers help drive improvements in animal welfare ?

As we have already pointed out, improving the quality, coverage and penetration of information, training and education is by far the most valuable tool in driving improvements in animal welfare.

We consider animal care and welfare education should begin in schools, at an age when children often have a natural affinity with animals and a natural desire to interact with them and provide care and nurture

6.2 Is the approach appropriate for all types of animal keepers, including non-commercial owners ?

Working with Government to improve knowledge and experience of good animal welfare, both for the professional animal keeper/trainer and for the private animal owner/keeper is certainly the way ahead.

To this end, the BDS has recently been putting together a package relevant to 14 – 19 year olds which can be delivered via schools. The BDS's ' Harnessing the Future' project proposes an integrated system where 14 – 19 year olds spend time in BDS approved carriage driving centres, being taught the basics of horse care, management and welfare, plus basic carriage driving skills, which are integrated with the Key Skills requirements of the National Curriculum. Training programmes culminate in students taking BDS Preliminary (NVQ 2), covering all the basic skills needed to look after and manage horses.

These skills will be sufficient for the work place and for private ownership, and will also provide an extremely good grounding on the general care of domestic animals. The advanced skills, responsibilities, discipline and commitment needed to look after a horse, pony, donkey or mule translate well to farmed livestock and other domestic mammals.

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Question 7. Do you agree with the supposition that there is no shared, robust data with which to baseline existing standards ?

It is always difficult to share data between organisations. As a general rule, species-specific organisations do not have the resources to devote to assimilating data relating to other species. In many cases, the data is so far beyond their sphere of interest as to be irrelevant – eg: equestrian organisations would find little use for information relating to caged birds, and presumably avian societies would not have much use for information relating to the approved and safe fitting of harness for the welfare and comfort of the horse.

Furthermore, in our shared experience with DEFRA in welfare in animal transport legislation, we have generally established that species-specific information is the easiest for owners, keepers and users to assimilate. It is almost impossible to share data which refers to 'animals' in general terms, because this necessitates laborious qualification of terms and lists of exceptions, which results in more confusion than the sharing of information.

Question 8. 1 will the provision of more comprehensive and standardised information on welfare provenance facilitate consumer selection of animals and products on welfare grounds ?

Enhanced provision of welfare information can only be beneficial.

So far as commercial ownership and use of live animals is concerned (mostly in the contexts of competing, showing, exhibiting, performing, breeding, and selling) it is reasonable to expect commercial owners/users to have more expertise than the private pet or hobby owner, because they routinely handle a larger number and wider range of animals and will therefore have more experience and expertise.

So far as consumer selection of live animals for private ' pet' use is concerned it is extremely important that purchasers are aware of the responsibilities and commitment they are taking on when they buy a live animal. Horses are a prime example of the necessity for prospective purchasers to have a good understanding of exactly what they are committing to as a purchase. Purchasers

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need to be fully aware of the on-going expenses and responsibilities associated with horse ownership, with especial regard to the general longevity of horses in comparison with other domestic pets.

Because horses are amongst the most complex and demanding animals which private owners are likely to own, it is not unreasonable that they should have access to information and the opportunity for both basic training and education, and more advanced education as their sphere of knowledge develops.

8.ii Can you suggest how better use could be made of assurance schemes and/or labelling ?

As horses are not normally regarded as food animals in the UK, we have no official opinion regarding food assurance and labelling schemes for equines. We cannot envisage a workable labelling scheme related to the purchase of live equines for private or commercial use.

The requirements and desires, coupled with the level of competence, experience and expertise, of the consumer with regard to horses are so wide-ranging, that in our opinion it would be impossible, and contribute little to animal welfare, to attempt to formulate an assurance scheme for live horse purchase.

For example, if a 5 year old horse were to be categorised at first sale as ' a quiet driving horse suitable for family use', would this prevent the horse later being sold as ' a showjumper' if he developed a previously-unsuspected talent for showjumping as he matured ? Similarly, would categorisation prevent an ex-racehorse being re-homed with a non-racing family as a pet on retirement from the racetrack ?

Whilst the current system, or lack of formal system, may not be ideal in protecting the consumer from false or creative advertising, there is rarely a welfare issue at stake and there are other safeguards to protect the purchaser. It is unlikely that a formal assurance scheme for the purchase of live equines would contribute anything significant to animal welfare, and would be tortuous to formulate and apply.

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TO PROMOTE INTEREST IN ALL ASPECTS OF EQUINE DRIVING



THE BRITISH DRIVING SOCIETY

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Question 9

9.1 Is there room for greater self monitoring/regulation by stakeholder organisations ? If so, how ?

Probably the best way stakeholder and special interest organisations can help improve animal welfare is by providing information and education specific to their species or sphere of interest. The horse world has a robust welfare sector, which includes many major international organisations, such as the ILPH, plus a large number of rescue and re-homing centres.

These organisations are already doing an excellent job in terms of identifying and rescuing equines from neglect and abuse, providing veterinary treatment and finding homes where they can enjoy a good quality of care for the rest of their lives. Equine welfare organisations already have the expertise in this area. Any new system would be unlikely to contribute anything much to the actual welfare of animals, and could seriously undermine the work of the current organisations by involving them in more paperwork. Needless to say, every welfare organisation would welcome additional funding to assist them in their work.

So far as the national governing bodies of sport, performance and general species-specific interest are concerned, we consider that our primary role is to provide opportunities for education, and Codes of Practice and Rules of Sport for equines, whether for recreational, sporting, breeding, exhibition, performing or competition purposes.

9.2 Can you suggest other ways of reducing the burden of compliance with legislation on animal keepers ?

If animal keepers have easy access to information and education provided by stakeholders, and if they can be actively encouraged to take advantage of the opportunities provided by education, then it would be reasonable that the burden of further inspection and regulation should be reduced on people who actively participate.

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Organisations like the BDS, which award NVQs in equine care and welfare and in the safe, humane and approved methods of equine training and usage, are able to make this sort of education available, for a fee, to anyone who wishes to have it. Routine horse care, welfare and management is the same for all equines, whether their role is to be driven, ridden, shown in hand, etc.

We would submit that equine owners, keepers and users who have taken at least an NVQ Level 2 qualification in equine care, welfare and management, should have the burden of multiple checks and assessments by statutory bodies reduced.

A national database where all the species-specific, welfare, sporting, breeding and general interest organisations could be accessed would be a very good way of helping the public to get access to information and education.

**Question 10 Should non-Governmental and stakeholder organisations have a role in representing the UK in international fora ?
If so, how should these organisations and Government work together to get the best results internationally ?**

From our experience with Horse Passports and Welfare of Animals in Transport legislation, we consider it would be extremely pertinent for stakeholder organisations to have a role in representing the UK.

We believe species-specific organisations, national governing bodies, etc., have a very significant role to play in advising Government on approved practices. In the horse sector, it is extremely important that each equestrian discipline has input into its own sphere in order to achieve the best possible practices in equine training, schooling, sport, competition, display, exhibition and performance.

So far as harness horse driving is concerned, the BDS have approved training and schooling methods, which are tried and tested, (harness horse driving has a provenance of over 2,000 years, reaching state-of-the-art in Victorian times), and a robust education and examination system which is respected world-wide. We are also responsible for administering the Harness Horse Training Board (HHTB) Code of Practice for commercial harness horse drivers, required by the Department of Transport.

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We have our own Code of Practice for general horse care, welfare, management and harness horse training, schooling, driving, competition, exhibition, performance and display. The BDS is committed to assisting Government in formulating Codes of Practice for equestrianism in all spheres.

Question 11

11.1 Is the focus of these 5 goals right ? Do they cover the most strategically important areas ? Is anything missing ?

The focus of the 5 goals is broadly right. They cover the strategically important areas

11.2 should the 5 goals be put into priority order ? If so, in what order would you list them ?

As we have already said, we are reluctant to list welfare issues and objectives in order of priority. Priority listing tends to focus attention on the items at the top of the list and can draw attention away from other items.

All welfare issues and goals should be read and addressed in conjunction with one another, since all welfare issues and goals impact on one another. Although we appreciate this can sometimes be a difficult mental exercise, it is vital to keep the overall picture in mind, and not be distracted by concentration on any one issue or goal to the exclusion or sidelining of any other.

Question 12

12.1 Does the proposed structure of the action tables cover all of the important issues ?

Goal 1 objective : those who interact with animals understand their specific responsibilities :

The BDS would be willing to work with Government to produce equine information packs for schools, colleges and the general public for equine care, welfare, understanding and knowledge. We are also able to deliver horse care and welfare education to NVQ Levels 2, 3, and 4, and Further

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Education in schools and colleges (where students can participate in our Harnessing the Future programme), and to the general public

Goal 2 : Animal welfare policy based on sound scientific research, practical experience and other relevant evidence

The BDS does not have an official input into food-related research

Goal 3 : Animal products labelled with clear consistent information on welfare provenance

Food labelling on welfare provenance can only be useful in helping the consumer make informed decision on what to buy

Goal 4 : effective, consistent enforcement of legislative requirements

For the equine sector, we generally feel that the current level of inspection and enforcement is about right if we are to avoid unnecessary burdens on animal keepers. We would be cautious of more equine-related legislation, but would welcome the opportunity to input into a more robust and up-to-date Code of Conduct for equine owners, users and keepers.

Goal 5 : International recognition that animal welfare is a public good

This is a welcome objective, providing that species-specific organisations, and organisations with particular expertise in the keeping and training of animals are closely involved from the outset. So far as live animal keeping and training is concerned, species-specific organisations are by far the best placed to offer expert advice, which will improve and maintain animal welfare, whilst keeping the burdens on owners, keepers and users (whether commercial or private) to an acceptable and manageable level

International legislation on food animal welfare and humane slaughter standards are one thing, but again we would emphasise that, for domestic animals kept for non-food purposes, legislation should not be seen as the only tool, nor, in our view, should it be preferred over information, education and codes of practice

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12.2 Can you suggest any specific actions that your organisation is/could commit to taking forward as part of the Action Plan ?

The BDS is currently in the process of putting together a package for schools called ' Harnessing the Future'; to enable 14 – 19 year olds to take part in a programme which integrates Key Skills learning with horse care, welfare, management and basic harness horse driving. This is designed to give young people the opportunity to have hands-on experience with horses.

Harnessing the Future is designed to relate Key Skills to horse related tasks. It is especially valuable for Special Educational Needs children and those who do not do so well in mainstream education, although the BDS would not wish to exclude any young person from the scheme. We are already running some pilot projects and it hoped that Harnessing the Future will be ready for nationwide use during 2007.

Further information on Harnessing the Future can be obtained from the BDS (contact list attached)

Question 13 Do you have any other general comments not reflected elsewhere in your response.

No

British Driving Society Contact List

The officials on this list can be contacted Monday-Friday during normal office hours. E-mails received over a weekend or bank holiday will be responded to on the next working day. All correspondence should be addressed to the appropriate official care of BDS Head Office

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