DEFRA Consultation on Equine ID and Traceability

Who we are

4. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 19,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

    We welcome the opportunity to respond to this consultation on Equine ID and Traceability

Digitisation

5. **To what extent do you agree or disagree that owners or keepers should be able to update all identification records on the CED (not just microchips, food chain status, and deaths), digitally (and to submit supporting documentation in the same way?)**

    We support the aim of this proposal, but it could prove challenging in practice. There are often many people with responsibility for a horse, in addition to the owner and the keeper (part owner, loaner, trainer, groom etc). The definition of keeper is not clear and there may be an intersection between the keeper and other roles. Any extension of access to the CED needs to be carefully thought out to limit this access to specific people, and to be very clear about how access is granted and rescinded. Provision also needs to be made for situations where there is a dispute between the owner and keeper. It also needs to be clear who has ultimate responsibility for a horse on permanent loan.

    Consideration must be given to how horses would be identified electronically by their markings, particularly for plain horses which require the position of whorls to be recorded. Photographs can be more useful in coloured and well-marked horses. ePPE, the electronic ID system which has been developed by the Veterinary Defence Society for pre-purchase examination certificates, should be considered as a model.

6. **To what extent do you agree or disagree that owners should be able to apply for a new digital passport rather than the initial passport needing to be a paper document (to note paper document would still be needed for certain purposes such as some international movement which could be applied at a later date)?**

    We support this proposal, with the caveat that the system must be compatible with the equivalents in the Devolved Administrations and the Republic of Ireland. Many horses frequently cross these borders, and it is essential that Defra works closely with counterparts to ensure that there is no difficulty in moving around Great Britain and Ireland. Providing compatibility is accounted for, digital passports are a sensible measure, which will be easier and quicker to update, supporting owners to do so within the required timescales. The full value and benefits of a CED will only be realised if all regions of the UK adopt it simultaneously and we are concerned that partial adoption could create additional problems and unintended consequences.

    We support the retention of paper documents for specific purposes. Unless a CED is adopted throughout the UK then paper documents are likely to be required by many horses who travel between England and the devolved countries of the UK. We agree that

owners need only apply for paper documents if they are needed for this or any other purpose, rather than requiring all owners to have both electronic and paper documents.

7. **To what extent do you agree or disagree that changes to studbook/breed details should <u>not</u> be made digitally and continue to be notified direct to the relevant PIO as currently?**

We support the ambition of digital updates to studbook and breed details, as this would reduce the confusion of having two documents for one horse. However, in practice this would be an enormous undertaking. To ensure the reliability and accuracy of data the systems would need to be linked, allowing information to be entered once, and visible across the system. Our view is that this should not be implemented at this stage, but could be reviewed at a later date when the digital passport system is embedded, and paper documents have become obsolete.

8. **To what extent do you agree or disagree that vets should be allowed to update the CED digitally for the purpose of recording microchips, vaccinations and other medical treatments?**

When vaccinating a horse, it already takes longer to complete the documentation than it does to administer the vaccine. Veterinary surgeons will be unenthusiastic about adopting any system which requires them to duplicate this effort for both a paperwork passport and digital identification. There are technological solutions which could assist with recording vaccinations digitally, but they will need to be driven by industry and embed with a wide variety of veterinary practice management systems. They are unlikely to be ready for the initial roll-out of a new CED but there should be an ambition to enable this facility at a later stage. The full value and benefits of a CED will only be realised if all regions of the UK adopt it simultaneously and we are concerned that partial adoption could create additional problems and unintended consequences.

We can see some value in having vaccination records available for equestrian events and competitions. However, for these to be accurate, they would have to be entered and signed off by veterinary practices, rather than by owners. This could place a heavy administrative burden on practitioners and is of no benefit to horses that do not leave their home location for competition or other events. For this to work practically, it would need to be integrated with practice record systems to avoid entering the same information twice. The requirement would also need to be for "veterinary practices" to update the record, rather than specifically "veterinary surgeons".

We do not believe there should be a requirement to record medical information in the CED beyond that which is required for a horse that is not signed out of the human food chain. It is not normal practice for full medical records to transfer with an animal and there are good reasons why this might not be desirable. Many owners are likely to push back against having any medical treatment "on the horse's record" unless there is a statutory requirement. This would also create a huge layer of unwelcome bureaucracy for veterinary practices.

9. **Are there any other relevant groups that you think should be allowed to update the CED digitally (please specify)?**

Statutory regulatory authorities should also be allowed to update the CED digitally.

Access to the database

10. **To what extent do you agree or disagree that read-only access to the CED should be extended to FBOs (e.g. slaughterhouses), welfare organisations, and event organisers? Please specify**

We agree - if this is limited to read-only access. We would also want "animal welfare organisations" to be carefully defined and limited to recognised animal welfare charities.

11. **Are there any other relevant bodies that you think should have read only access to the CED (please specify)?**

It would be useful for a national disease surveillance unit to have access to some of this data. Although equine insurance companies would potentially benefit from this, if they were able to access a horse's past medical history it could have unintended consequences for the viability of horse insurance.

Historic Records

12. **To what extent do you agree or disagree that the release of historic ownership data contained on the CED to future owners should continue to only be available with the consent of the current owner?**

Owners should be able to withhold their own personal data in accordance GDPR legislation. However, the only information that it should be necessary to pass on to new owners is whether or not that horse has been prescribed medication which would exclude it from the human food chain.

13. **To what extent do you agree or disagree that both the current and new owner should be responsible for notifying a change of ownership? Please explain your views and how this could work in practice.**

Broadly agree. This would provide a check and balance where one party is reluctant for whatever reason to update the records. If the onus remains solely on the seller, buyers have no way to ensure that the record is accurate and to assert their right as the new owner. This would also flag any dispute over ownership.

As for putting this into practice, both buyers and sellers are required to notify the DVLA of the sale of a vehicle. We see no reason why a comparable system would not work here.

14. **To what extent do you agree or disagree that the time limit for notifying the PIO of a change of ownership should be reduced to 14 days?**

We feel that 14 days is an unrealistic timeline, when there is no compelling reason for this urgency. We propose that 30 days would be a more reasonable deadline.

15. **To what extent do you agree or disagree that the time limits for all notifications to PIOs of changes to an equine's records should be standardised?**

It would be useful to standardise this along with having a common system for all records. However as above, this timeline should be 30 days for non-urgent changes (i.e. not relating to public health or animal welfare).

Links with other databases

16. To what extent do you agree or disagree that other databases e.g. those belonging to PIOs, the horseracing and thoroughbred sectors, the Devolved Administrations an the Republic of Ireland should be allowed to update the CED via APIs

One system would be extremely helpful, and we would support this to ease movement between England and the Devolved Administrations and the Republic of Ireland. However, we have concerns that the smaller PIOs may find this unworkable as it is unlikely they all use the same software, and it won't work unless PIOs are integrated using APIs. There is likely to be a cost to them introducing this. Consideration should be given to ensuring smaller organisations can participate without disproportionate cost and effort.

17. To what extent do you agree or disagree that we should allow APIs to link data from the CED to other electronic systems used to support e.g. export health certifications?

This could be very useful for facilitating export certification. However, we would want this to be limited to specific organisations where there is a clear business need for participation.

Traceability

18. To what extent do you agree or disagree that it should be made a legal requirement to record the habitual location of each equine on the CED?

This would be useful and is a sensible first step in an evolving system. Location is key for good traceability and for safeguarding health and welfare. However, the system needs to be easy to use and accessible to ensure that owners keep the information up to date.

19. To what extent do you agree or disagree that some, or all, temporary locations should also be included on the CED? (Please specify which, if any, locations should be included.)

We disagree, unless there were an automated system which did not rely on owners to manually update the CED. Otherwise, it would be impractical and impossible to implement or police. It is unnecessary for race meetings and sales where entrants' details are recorded anyway. If implemented, there would need to be a minimum duration of stay in a temporary location that would require an update.

We are also concerned about the impact on the Gypsy/Roma/Traveller communities, and whether an equality impact assessment has been carried out to ensure their needs are met. While digital access makes it easier for them to maintain their records, something that is burdensome to the settled community, could be almost unworkable for a travelling community. Furthermore, many locations they use will not have a fixed address and will therefore be difficult to enter into the system with any accuracy. For historical reasons, many members of those communities are also likely to be resistant to any requirement to record their horse's (and therefore their own) every move into a Government database.

20. To what extent do you agree that organisers of events, sales etc. should be required to keep a record of the equines involved?

This is generally done anyway for races and sales etc. We see no need to ask organisers to duplicate the data gathered, although could perhaps require them to record specific

things (e.g. passport numbers) in their own records to ensure it is fit for purpose if needed for traceability.

21. **To what extent to you agree or disagree that organisers of events, sales etc. should also be required to log relevant details digitally on the CED (e.g. via the Digital Stable)?**

We are concerned about how to define which events would need to comply with this requirement. With industry buy-in, this could work for big organisations e.g. British Horseracing, but would be much more of a burden for e.g. Pony Club branches and riding schools holding local competitions – potentially deterring them from organising events which are important for getting young people involved in equestrian sports. If such organisations are required to log relevant details digitally on the CED then consideration must be given to ensuring that process is extremely simple and does not represent an unnecessary layer of bureaucracy.

Registration/Identification

22. **To what extent would you support, or not support, a standard requirement to register equines by 31st December in the year of birth (with only very limited flexibility for those born on or shortly before this date) or before a foal without its dam leaves its place of birth permanently?**

We should ensure that any system is in line with that in place in the Devolved Administrations and Republic of Ireland to avoid any confusion when foals are moved across borders on leaving their dam.

23. **Do you have any alternative suggestions to the above?**

Registration should be complete before the foal is weaned, as that is the earliest point it can be moved/sold without its dam.

24. **To what extent do you agree or disagree that a simplified temporary identification is appropriate to deal with moving equines to the protection of welfare organisations, direct to slaughter, or for another purpose? Please specify which purposes you think a simplified temporary identifications would be appropriate for.**

We support this as a pragmatic way to assure welfare. Also for movement to an equine hospital/veterinary facility, where any changes to the system would prevent this being done without documentation as currently.

25. **To what extent do you agree or disagree that a temporary identification should be digital and applied for using a standardised digital application**

We agree, as long as there is some provision for emergency circumstances in remote areas where digital access is not available before the movement takes place.

26. **To what extent do you agree or disagree that paper passports should be retained for use domestically in England, as well as to accompany international movements, e.g. to the EU?**

For the CED to operate without paper passports it will be important that the devolved administrations and the Republic of Ireland recognise the electronic records on the CED.

If that does not happen, it will be important to retain paper passports, notably as it will allow England to stay in line with the Devolved Administrations and the Republic of Ireland, easing movements around Great Britain and Ireland. However, if a horse has both a paper passport and electronic record there is a significant chance that the data recorded in them will not remain synchronised. The full value and benefits of a CED will only be realised if all regions of the UK adopt it simultaneously and without that, paper passports will still fulfil an important role.

27. **To what extent do you agree or disagree that paper passports and the applications forms necessary to obtain them should be in a standardised format**

Strongly agree. The current system is more complicated than it needs to be and it can be very time consuming to find particular sections of a passport when they are formatted differently by different Passport Issuing Authorities. A standardised format would make it simpler to sport errors or fraudulent documents.

28. **To what extent do you agree or disagree that it should be possible to add a note in supplementary pages of identification-only passports to confirm that the equine is not eligible to be registered?**

Agree. This is a sensible move to aid clarity.

29. **Do you have alternative suggestions to confirm the unregistered status of equines in identification-only passports?**

A simple data field on the central equine database stating whether the horse is registered or unregistered.

Enforcement

30. **Do you have any suggestions as to how enforcement of the equine identification rules could be improved?**

We would strongly oppose any suggestion that vets should be expected to enforce the rules. This would break down trust and client confidentiality, and also has the potential to increase suffering if non-compliant owners are reluctant to call in the vet, because they fear penalties for inadequate paperwork.

Semi-wild equines

31. **To what extent do you agree or disagree that the existing rules for the movement of semi-wild equines over 12 months old to slaughter should be changed?**

32. **If you do believe that the existing rules should be changed, should the pre-2009 arrangements be reinstated, should a simpler temporary identification system be introduced, or do you have another suggestion?**

Slaughter

33. **To what extent do you agree or disagree that it should be possible to allow equines previously signed out of the human food chain to be reinstated at a future point?**

We strongly disagree with this proposal. There is little demand for horses to remain in the human food chain, and so few do go into the food chain, there would be minimal benefit to doing this. From a vet's perspective, this needs to remain a one-way process. Knowing that a horse is permanently out of the food chain simplifies administration when treating horses. If there was any question of that status changing in future, it would over-complicate the process for very little if any benefit to most horse owners.

34. **To what extent do you agree or disagree that we should remove the current ability for owners to sign an equine out of the food chain for any reason?**

We strongly disagree that this should be changed. It is important that owners remain able to sign their horse out of the food chain, and that it is a simple process. Signing horses out of the food chain is the only way certain drugs, essential treatment for some conditions, can be used (notably phenylbutazone).

Zootechnics

35. **To what extent do you agree or disagree that it is appropriate to establish a clear distinction between identification and studbook records?**

We agree. There needs to be an official record, and the main aim of the studbook is not to ensure traceability and welfare. Having two documents for one horse can add confusion, therefore keeping a clear distinction between ID and stud records will aid clarity and ensure there is a common system in place for identification of all horses.

36. **To what extent do you agree or disagree that there is value in digitising studbook records?**

There would be great value in digitising studbook records, but it would potentially be extremely complicated to keep it accurate. Any digital system would need to accommodate the reality that many horses move across the whole of Europe and have studbook records from overseas.