DEFRA CONSULTATION ON CHANGES TO THE IDENTIFICATION OF EQUINES

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 16,000 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.

2) We have consulted specialist division the British Equine Veterinary Association (BEVA) who are developing their submission in liaison with the wider equine industry via the Equine Sector Council, and we are in support of their views.

3) In 2013, in response to the announcement that the presence of phenylbutazone had been confirmed in a small number of horsemeat samples which had fraudulently entered the food chain, we expressed full support for the concept of the Horse Passport Regulations but reminded Defra that we had argued for some time that there were problems with the system in terms of the number of Passport Issuing Authorities and the vulnerability of the system to fraud. In partnership with BEVA we called for Defra and others to find ways to make the system more robust, in order to facilitate the ongoing medical treatment of horses not intended for human consumption and protect the UK food chain. As such, we welcome the proposals detailed in the Defra consultation document on changes to equine identification.

4) Central Equine Database
   We fully support the moves to deliver the new Central Equine Database (CED) and the legal requirement for Passport Issuing Organisations (PIOs) to upload and update passport information from their own databases to the CED. We also support the proposed requirement for PIOs to update the CED with new or amended information within 24 hours of the record being created or amended by the PIO rather than the 15-day maximum deadline which is set in EU legislation. We agree that this will facilitate the provision of ‘real-time’ information to enforcement bodies helping with locating owners of lost or abandoned horses and allowing more effective verification of food chain status. We support the BEVA call for veterinary surgeons to have access to the database in order to confirm the food chain status of any horse they treat and believe that a partnership approach to compliance will lead to increased reporting and better quality data.

5) Horses living under wild or semi-wild conditions
   We support the proposals to continue to allow horses living under semi-wild conditions in Dartmoor, New forest, Exmoor and Wicken Fen to continue to be exempt from the requirement to be identified until they are moved from these locations or enter domestication. We support the BEVA suggestion that there should be no requirement for these horses to be identified in order to be treated with a
medicinal product with a zero-withdrawal period. This would allow treatment with a licensed medicinal product to inhibit oestrus, leading to the reduction of the foal crop for sound horse welfare reasons.

6) Microchipping of horses
We support the principle of extending the microchipping requirement to include horses born before 1 July 2009. The one-off cost of microchipping a horse would not be disproportionate for horse owners and the animal welfare benefits in terms of being able to identify lost, stolen, abandoned or fly grazing horses, and identify horses in the face of disease outbreak, as well as the benefits to the integrity of food chain safety would outweigh any practicalities of implementation. We support the BEVA view that universal microchipping of horses simply ensures that the legislation has value, the cost of implementing a CED is not wasted, and that food safety is protected.

7) For the same reasons listed above, with regard to retrospective microchipping, we agree with the proposal to regulate to require the owner to re-microchip where the original chip has failed or migrated, subject to full and careful checking with appropriate readers.

8) Responsibility for notifying a PIO that a horse has been signed out of the food chain
We strongly support the proposal that the owner should be legally responsible for reporting changes to the PIO.

9) Penalties, enforcement and driving up compliance
We support the BEVA view that the education of owners with regard to their responsibilities will be crucial to success, as will making it as easy as possible for owners to notify changes of status, supported by an online notification tool. We also agree that the introduction of civil sanctions should be further explored, although of course the option to prosecute serious offenders should remain.

10) Costs
We understand that BEVA and Equine Sector Council colleagues will be providing a detailed response with regard to the potential impact on businesses.

11) Additional comments
We support the BEVA concern regarding the proposed new responsibility for veterinary surgeons, when identifying a horse, to ensure that an accurate estimate of the horse’s age is recorded on the application form where the actual date of birth is unknown. As it is not possible to estimate with any accuracy the age of a horse through dental examination, this proposed new responsibility would place an unreasonable burden on the vet who must certify facts and opinions honestly and with due care, taking into account the RCVS 10 principles of certification.

12) In conclusion, and notwithstanding the concern raised above in paragraph 11, we
broadly welcome the Defra proposals for changes to the identification of equines and believe that the measures, particularly if retrospective microchipping is required, will represent an important step forward for horse welfare and the integrity of the UK food chain.