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) The BVA's Welsh Branch brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions and research organisations in Wales. The Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom issues.

3) We welcome the opportunity to comment on the draft Code of Practice and we broadly support the contents of the draft, subject to some minor amendments and clarifications suggested below.

4) Preface
It should be made clear that a veterinary surgeon should be the primary source of health and welfare advice. The animal care specialists referenced in this section should be secondary.

5) Duty of care
Where the Code references the purpose of a horse passport, it should be clear that one of the functions is to “state whether your animal could go into the human food chain at the end of its life”. We believe that the current reference to “dies” could lead to confusion over the circumstances under which a horse could be considered acceptable for the food chain.

We would also like to see references to Equine Dental Technicians removed from this section as the title is not protected and ‘qualified’ in this context is difficult to define.

Owners should consider the cost of transportation and/or disposal in the event of injury or death of their horse. Reference to this potential cost, which can be considerable, should be included in this section, particularly as abandonment is a welfare issue often resulting from owner inability to afford treatment or euthanasia.

6) Environment
Although we agree that some hardy breeds such as native ponies are capable of living outdoors throughout the year provided they have some form of shelter from the elements, we would like to see some reference to the need for access to hard standing/stable for the purposes of veterinary treatment should it be required. It should also be clear that some access to good grazing is essential and that turnout is a fundamental welfare need, although for obese horses, and those suffering from obesity related conditions such as laminitis, access to grazing may need to be limited, and veterinary advice should be sought.

7) Diet
It should be clear that obesity, and obesity related conditions such as laminitis, are common welfare issues in horses, and that veterinary advice on diet should be taken.
8) **Exercise**
As above, turnout is a fundamental welfare need and important for the management of body condition, with obesity and associated laminitis the most common welfare problem seen in horses in Wales.

9) **Health**
As most horses with dental disease show no outward signs at all the Code should recommend that a horse’s teeth and oral cavity are examined by a veterinary surgeon at least annually.

10) **Appendix 2: The Law**
This section should also reference the Veterinary Surgeons Act 1966.

**Conclusion**

11) In conclusion, we support the draft Code subject to the role of the veterinary surgeon in providing health and welfare advice being prominent throughout. We are also attaching a number of suggested amendments for consideration which have been provided by individual BVA members with particular interest and expertise in this area, and which are in line with the broader suggestions detailed in this consensus response.

October 2017
Annex

Drafting suggestions for Code of Practice for Welfare of Horses

Original is in black italics

Comments and suggested edits in red

Page 2 Preface

You will find reference in the code to animal care specialists. These are people who, through qualification or experience, can provide expert advice on welfare and some aspects of health for one or more type of animal. Examples are animal behaviourists, veterinary nurses and dedicated welfare organisations. Owners/Keepers should look to their veterinary surgeon (vet) for advice on their animal’s health.

Suggest swapping sentences around, as vets should be the first port of call on animal health:

Owners/Keepers should look to their veterinary surgeon (vet) for advice on their animal’s health. You will find reference in the code to animal care specialists. These are people who, through qualification or experience, can provide expert advice on welfare and some aspects of health for one or more type of animal. Examples are animal behaviourists, veterinary nurses and dedicated welfare organisations.

Page 4 Introduction

Every animal is different and as you get to know your horse, you will learn and recognise its characteristics. It is important that you are able to notice any changes in behaviour, as these might indicate that your horse is distressed, unwell, or is not having its needs met in some other way.

Change characteristics to more suitable wording, eg “normal appearance and behaviour”.

Page 5 Duty of Care

Responsibility for an animal includes having an understanding of its specific health and welfare needs and having the appropriate knowledge and skills to care for the animal. Those responsible for animals must also comply with legislation, be aware of the appropriate Code of Practice and know when and where to seek qualified advice and help, e.g. from a farrier, equine dental technician or a veterinary surgeon.

“Equine Dental Technician” is not a legal entity, unlike vet or farrier. “Qualified” advice from one is therefore a very grey area. There are numerous “qualifications”, which are not currently recognised in law, many of which are not proof of competence. The term Equine Dental Technician, and Equine Dentist are unprotected, and as such can be used by anyone, regardless of training or qualifications. Equine welfare problems associated with the use of unregulated equine dentists are seen commonly in equine veterinary practice. Since only a veterinary surgeon can legally diagnose or treat dental disease in a horse, recommend avoiding the terms Equine Dental Technician, or Equine Dentist, in this code.
The cost of buying a horse may be minimal compared to the ongoing costs, which will vary, depending on the needs of the individual horse, where it is kept and what it is used for. As well as the day-to-day costs, costs for supplementary feeding, worming, insurance, veterinary fees (including regular vaccinations and dentistry), farriery, equipment, transport and training etc. all need to be considered. Add a sentence here: The costs of veterinary treatment, transportation and disposal, in the case of sickness, injury or death of a horse, can also be very substantial. Potential keepers should consider all costs before deciding if a horse is affordable;

(suggested addition because a common cause of welfare problems, including abandonment, is inability to afford euthanasia or disposal)

Page 6 Duty of Care

will affect how the horse is to be reared, stabled, fed and/or exercised. Seek advice before making a decision. Before purchasing a horse, it is advisable to try a number of different horses, to allow comparison, and the advice of an experienced horseperson should always be sought. Before buying, it is essential to try a horse in each aspect of work that it is likely to be asked to perform, for example hacking, jumping and flatwork, and it is advisable to try out favoured horses more than once. A pre-purchase examination by an independent veterinary surgeon is highly recommended

“Independent”- not needed here, as a vet would have to declare any conflict of interest before undertaking the examination.

- The potential keeper should consider how and where the horse will be kept;
- Add in: The horse’s need for company should be considered. Horses are herd animals and should preferably be kept on premises with other horses.

o having isolation facilities available if required following veterinary advice

isolation facilities- explain terminology. Suggested wording:

“……………having isolation facilities, away from contact with other horses, available…….”

o alternative arrangements for the care of a horse should the keeper become incapacitated for any reason.

Incapacitated-not easily understood. Suggested wording:

“Alternative arrangements for the care of the horse, in case the keeper is unable to attend to it for any reason”

- Any horse bought or sold must have a valid horse passport. Horses, ponies, donkeys and similar animals must have a horse passport. The small booklet identifies your animal by its height and species and states if your animal can be used for human food when it dies. Horse passports are a legal requirement. The details of the passport should be checked before purchase, in particular the silhouette (diagram providing markings/colouring) to ensure it matches the horses and, if possible, the microchip to ensure it matches the passport. The issuing organisation that provided the passport can confirm that it has in fact been issued by them. A list of authorised organisations is available on the Welsh Government website.

“when it dies” is suggesting that natural death may be followed by going into the food chain.
Change to “The passport also states whether the horse is eligible to go into the human food chain at the end of its life.”

If a horse cannot, or does not, enter the food chain the cost of end of life disposal may be considerable. This could be mentioned here as many owners do not consider this.

Page 7

Shelter 1.2 Not all horses need a stable or housing. Some hardy breeds (such as native ponies) with thick coats are capable of living outdoors throughout the year, provided they have shelter from the wind and summer sun. Shelter can be natural (for example trees or hedges) or man-made. However, where horses are of less hardy breeding (e.g. thoroughbreds), clipped, very young or old they may require a stable, housing or other shelter to protect them from rain, wind and extremes of temperature.

Add in a sentence about overweight horses not being suitable for 24 hour grazing:

Obesity is a common welfare problem in horses, ponies and donkeys. For overweight animals, and those suffering from obesity related disease such as laminitis, 24 hour grazing is not a suitable management system. Stabling or grass-free turn out areas will be needed as part of their management. Advice should be sought from a veterinary surgeon.

• *Doors should be at least 4 feet (1.2 metres) wide, and comprise of a top and bottom door. Doors must open outwards and the bottom door should be of a height that allows the horse to look out with the head comfortably over the door.*

This advice is dated and excludes a lot of acceptable modern stabling arrangements, such as indoor barn style stabling, which have no top doors, and doors that slide across rather than opening outwards.

Change to:

Doors should be at least 4 feet (1.2 metres) wide, and should not open inwards. The bottom door should be of a height that allows the horse to look out with the head comfortably over the door.

*Light: Good lighting is essential within all stabling both for the horse to see adequately and to enable inspection and safe handling of horses; This can include portable lighting. Light bulbs and light switches should be enclosed in safety fittings with cabling secured well out of reach;*

Page 9

Pasture 1.9 As a guide, in order to maintain correct body condition, each horse requires a minimum of 0.4 to 0.6 hectares (one to one and a half acres) of good grazing if no supplementary feeding is being provided. However, this will depend on the ground conditions, the time of year, type of horse and degree of pasture management employed. A smaller area may be appropriate where a horse is principally stabled or housed and grazing areas are used only for occasional turnout.

Add a paragraph:
For overweight animals, and those suffering from obesity related disease such as laminitis, the quality and area of grazing, and the number of hours spent grazing, will need to be restricted. Overweight animals may therefore need to be managed in a separate group to those of the correct body weight. Advice should be sought from a veterinary surgeon.

Page 10 Poisonous Plants

1.16 There are a number of plants including ragwort, yew, laburnum and sycamore that are toxic to horses. Comprehensive lists of poisonous plants can be found on the websites of most horse and welfare organisations. Links to these websites can be found in Appendix 3. Keepers should be familiar with these plants and should ensure that horses do not have access to them (or their clippings) at any time. Where fields back on to housing, care should be taken to ensure that horses do not gain access to garden waste including lawn cuttings.

Yew and Laburnham are very uncommon causes of toxicity in horses. Vegetable peelings are also a common cause of poisoning. Change to:

Poisonous Plants 1.16 There are a number of plants including ragwort, sycamore and acorns, that are toxic to horses. Comprehensive lists of poisonous plants can be found on the websites of most horse and welfare organisations. Links to these websites can be found in Appendix 3. Keepers should be familiar with these plants and should ensure that horses do not have access to them (or their clippings) at any time. Where fields back on to housing, care should be taken to ensure that horses do not gain access to kitchen or garden waste including vegetable peelings and lawn cuttings.

Could be worth adding that preserved feed that has ragwort present will remain toxic.

Page 13 Water

If natural water sources such as streams are to be relied on they must be clean, copious and easily accessible.

Add In:

Natural water sources should not be used if there is a risk of horses falling in, becoming trapped or causing environmental damage to access points.

2.3............ Fresh water should be supplied in clean buckets or via automatic drinking bowls. Buckets should be refilled at least twice a day and should be secured to prevent them from tipping?

Most stable buckets are not secured. Change to:

Fresh water should be supplied in clean buckets or via automatic drinking bowls. Buckets and automatic bowls should be checked and if necessary, refilled, at least twice a day. If buckets are used, more than one bucket should be available, and they can be placed in a tyre, or secured to a wall, to prevent tipping.

2.4 Water troughs should be securely fixed at a convenient height to allow horses to drink comfortably and it should not be possible for horses to paw the water or dislodge the trough.
and knock it over. There should be no sharp edges, protruding corners or exposed taps – they should be boxed in. Troughs and other water containers should be cleaned thoroughly on a regular basis. Troughs should be positioned in a way so that it would not be possible for a horse to be trapped or cornered in the area of the trough. Where buckets are used, they should be checked regularly to ensure that horses have water.

Checked regularly is open to interpretation, and automatic troughs should also be checked in case they aren’t working. Change to:

Troughs, including those that fill automatically, and buckets should all be checked at least once a day.

Page 13 Feed

2.5 Horses naturally eat little and often. Their natural diet is mainly grasses, which have a high roughage and low energy content. Horses should be provided with a balanced, predominately fibre-based diet of either grass, hay, haylage or a hay replacement in order to mimic their natural feeding pattern as closely as possible. They should be fed an appropriate diet that reflects their needs and keeps them in good condition. Consideration should be given to the age, type, weight, condition, health and level of work of the individual.

Add a paragraph after 2.5:

It is important that any change in a horse’s diet is made gradually, over an appropriate period of time. This includes moving to a new grazing pasture, or changing from twenty-four grazing to being stabled and fed hay. This can help prevent problems such as colic (abdominal pain) which is a very common disorder of horses, and is often associated with changes in diet and management.

Page 14 Feed

Add a paragraph before 2.8:

Healthy horses fed on good quality grazing or hay do not usually require additional feeding of concentrates (cereal-based feeds). Horses required to maintain high levels of exercise and fitness, may sometimes require additional feeding. However, feeding large amounts of concentrates to an animal that is designed to eat fibre, can have a detrimental effect on its gut health. When concentrates are fed, it is preferable to feed commercially mixed, nutritionally balanced feeds such as cubes and course mixes, rather than straight cereal crops such as oats or barley. A horse’s stomach capacity is relatively small in relation to its body size. Therefore, feeding concentrates in small quantities, several times a day, is preferable to larger less frequent feeds.

2.8 The quantity of concentrates (this does not include feedstuffs such as chaffs and sugarbeet) fed as supplementary feed, in addition to any grazing or similar fodder, should be no more than that necessary to meet the energy demands of the horse in response to the work the horse is doing. Feed should be well mixed and freshly prepared. Horses should not be asked to perform hard or fast work on a full stomach.

Page 14 Laminitis

Add an introductory line to this paragraph:
2.12 Obesity is a common and serious welfare problem of horses. Obesity and certain metabolic and dietary factors are among the risk-factors for laminitis - a painful and debilitating disease, affecting the feet of horses. Fat animals are at a higher risk of developing laminitis than animals of a healthy weight. The high energy content of lush grass (e.g. during a spring or autumn flush of grass growth) represents a risk to susceptible animals and their grazing may need to be restricted. Keepers requiring more detailed guidance about laminitis and the correct management of susceptible animals should contact their veterinary surgeon.

Page 19 Exercise

3.2 Horses and ponies require exercise, which will require time and effort from the horse keeper, or freedom to exercise. All stabled horses should be turned-out daily in a field or exercise area every day, unless exercise is being restricted under veterinary guidance. Where turn out is not possible, appropriate daily exercise and/or in-hand grazing must be provided as an alternative.

“Turned-out” - remove hyphen

“Daily….every day” - repetition, remove one or the other

Page 19 Training

3.6 Horses learn by reward and repetition, so it is important that they are rewarded for their behaviour in a way so that they will repeat it. Negative or harsh training methods are both unacceptable and counter-productive. Horses do not understand which behaviour to exhibit until they have been taught. Most problematic or unwanted behaviours in horses are as a result of pain, fear or incorrect handling. Advice on resolving undesirable behaviour or traits should be sought from a vet, qualified instructor or behaviourist.

“in a way so that they will repeat it” doesn’t read well. Change to:

Horses learn by reward and repetition, so it is important that they are rewarded for a desirable behaviour, in a way that encourages them to repeat that behaviour.

Page 22 Health

5.3 Keepers of horses should be familiar with the normal behaviour of their horses and be able to recognise signs that may indicate poor health.

These can include:

• changes in demeanour or behaviour;
• changes in appetite (for food and water);
• signs of pain or lameness (abnormal way of moving); ............Explain “lameness” in brackets
• the presence of any injury;
• unexpected weight loss and changes to coat condition;
• changes in body temperature, pulse, breathing rate; and
changes in faeces (dung) and urine ………..Explain “faeces” in brackets.

Page 22 Teeth

5.8 The teeth of horses continuously erupt and wear down throughout their life, and are therefore constantly changing. Most horses will require rasping of 23 their teeth at least once a year. Signs of dental disease can include abnormal chewing of food, abnormal reaction to the bridle, dropping half-chewed food and loss of condition. However, most horses with dental disease show no outward signs at all. Consequently, keepers should become familiar with their horse’s normal dentition and learn how to regularly examine their horse’s mouths. A horse’s teeth and oral cavity should be examined by a veterinary surgeon at least once a year.

It isn’t possible for keepers to become familiar with the horse’s normal dentition or to regularly examine their horse’s mouth, as they cannot inspect the oral cavity. Change wording to:

However, most horses with dental disease show no outward signs at all. Therefore, a horse’s teeth and oral cavity should be examined by a veterinary surgeon at least once a year.

Page 22 Teeth continued:

Only a veterinarian is qualified to diagnose dental and oral disease and any treatment of such conditions should be undertaken either by a veterinarian or, by a dental technician under their supervision.

Formatting: use veterinary surgeon, as used elsewhere in document.

“Equine Dental Technician” is not a legal entity, unlike vet or farrier. The term Equine Dental Technician, and Equine Dentist are unprotected, and as such can be used by anyone, regardless of training or qualifications. Equine welfare problems associated with the use of unregulated equine dentists are seen commonly in equine veterinary practice. Since only a veterinary surgeon can legally diagnose or treat dental disease in a horse, recommend avoiding the terms Equine Dental Technician, or Equine Dentist, in this code.

Suggested wording:

Only a veterinary surgeon is qualified to diagnose or treat dental and oral disease in the horse.

Page 23 Biosecurity

5.13 Effective biosecurity involves planning ahead and some simple things that can be done include:

• Implementation of good routine management and husbandry practices;
• Ensuring good hygiene procedures (between humans and horses and between different horses) are maintained. Pressure washers, brushes, hoses, water and disinfectant should be available for easy use and be used according to their risk;

• Avoiding stressing horses; stress can predispose some animals to disease;

• Ensuring boundaries are secure; horses should be prevented from mixing, and be unable to make nose to nose contact, with neighbouring animals;

• Only sharing equipment if it has been thoroughly cleansed and disinfected before and after moving between premises or groups of horses;

• **Implementation of a pest control programme;**

  Explain "pest control programme"- does this refer to insect vectors/ rodents or both?

• Having biosecurity arrangements in place for visitors to the premises; (add plural)

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**Page 31**

*Other legislation affecting horses*  
As well as the Animal Welfare Act 2006 and regulations in respect of equine identification (please see Annex 4) there are a number of other laws that affect the way equines are kept. The ones most likely to affect the keeper of an equine are summarised below.

The Veterinary Surgeons Act 1966 should be added to the list of relevant legislation. Important, for example, when highlighting the fact that it is illegal for non-veterinarians to carry out procedures such as castration.