

Horse Passports: consultation regarding new proposed Regulation on the identification of horses.

Could you please record your views under the relevant header and keep your comments short and focused. We are particularly interested in the financial costs or cost reductions that you are likely to incur. Please email your completed questionnaire to luyi.brown@defra.gsi.gov.uk or by mail to Luyi Brown, 1a Page Street, Area 208, London, SW1P 4PQ.

Response by the Rare Breeds Survival Trust

We wish to make some initial general points.

- a. The native equine breeds of the United Kingdom are an important part of the genetic diversity described in the Convention on Biological Diversity to which the UK is a signatory.
- b. Some semi-feral herds running on their native heath have special status, from both genetic and environmental points of view.
- c. The breed societies responsible for the registration of native horse and pony breeds already are under great pressure, both administratively and financially, and the extra burden imposed by passport procedures and changes may reach intolerable levels.
- d. Many societies feel that micro-chipping simply will impose extra burdens with insufficient benefits.
- e. The potential loss of animal genetic resources (i.e. reduction in numbers) as a result of these pressures would be contrary to our responsibilities under CBD.
- f. The proposed implementation date of 1 January 2007 is not feasible. Societies would need an extra two years to absorb the changes, modify regulations and upgrade computer systems.

Q 1: Microchipping of Foals – Article 9

- a. A requirement for mandatory micro-chipping of foals would present significant problems for several pony breeds, especially those with semi-feral herds.
- b. The difficulties likely to be presented by restraining un-handled foals sufficiently to implant the transponder effectively include potential welfare issues. It would be impractical to bring foals in twice - once for micro-chipping and once for sale.
- c. The need to employ "A trained veterinarian or person holding an equivalent qualification" will incur significant costs, and is likely to make the cost of micro-chipping greater than the value of many of the foals.
- d. We would recommend the use of other proven methods of identification for foals.

Q 2: Recording of Microchips details. - Articles 8 and 9

- a. All extra imposed procedures incur additional costs which increase both the bureaucratic burden and financial burden on breed societies already under great pressure. Apart from the cost of implanting the transponder, further revisions to passports and databases make high demands on time and financial resources.
- b. Societies already have a supply of forms, and would not have expected to require a new set of updated forms. The continual changing of regulations is a severe drain on the resources of breed societies.
- c. Pony breeds will wish to continue using silhouettes, and there will not be a saving on this item.

Q3: The Recovery of Microchips at Slaughterhouse and from dead animals - Article 10

- a. It is not a usual occurrence for equines to enter slaughterhouses. Horses and ponies have a special relationship with their owner and most are put down on the owner's premises.
- b. The recovery of microchips require careful monitoring to prevent possible abuse of the system.

Q4: Derogation for foals under the age of 12 months going direct to slaughter – Article 16.

We welcome this derogation, although the process of making a case for exemption (numbered mane seal and health certificate) will add to the increasing bureaucratic burden.

Q5: Changes to the format of the Horse Passport – Articles 4,7, 20 & 26

We welcome the derogation for equines "Living under wild or semi-wild conditions in certain areas" from passport requirements until they are removed or brought into domestic use, but wish to be reassured that this definition will be applied to semi-feral (or free-living) herds of native breeds. Arrangements are in place for New Forest and Dartmoor Ponies, but should also apply to other breeds (e.g. Exmoor, Fell, Eriskay, etc).