

Draft Code of Practice for the Welfare of Horses

October 2017

The RSPCA is delighted to respond to the consultation on a new draft of the Code of Practice for the Welfare of Horses. The Code is an extremely important document which may be used by those with responsibility for equines to help them understand how to care for them. The RSPCA uses the Code in our everyday duties both to work with owners to improve the welfare of their animals and also in more extreme circumstances of a prosecution where it is used to demonstrate what required of an owner/keeper, to meet the needs of their horse, under the Animal Welfare Act 2006. Since the Code was introduced in 2008 the RSPCA has continued to print and distribute copies throughout Wales as an essential tool in our ongoing work to improve animal welfare and prevent suffering, as such we welcome this process to update and refresh the content. We hope the following document will be of assistance. As applicable, this document refers to, and cites, current guidance from equine welfare experts as well as details of relevant legislation. Some general equine welfare points considered helpful are also included.

GENERAL COMMENTS:

- **Document Design & Language:** Some owners or keepers may personally own, or care for, a range of companion animal species (dogs, cats, rabbits and horses), therefore, it is important to ensure consistency of design and generic language across the Codes of Practice for all species. The use of colour and images, as in the previous version of the equine Code, is considered appropriate and beneficial
- **Cross Reference Information:** It might be helpful to signpost important website links, as well as the Appendices, within the main body/text of the Code
- **Code Promotion:** Evidence¹ suggests that awareness of the Codes amongst the animal owning population is generally limited, despite its online availability. Hardcopies are not easily available. We would therefore welcome a discussion - perhaps with our partner organisations on the Animal Welfare Network Wales - on how best to make the Codes more accessible. The RSPCA would recommend a user-friendly online format of the Code which is also fit for purpose for all platforms (such as mobiles).
- **Donkey Information:** Recent research states that donkeys, mules and hinnies should not be viewed as small horses or ponies. There are some specific variations between these equine species and their breed specific needs². Some new information on donkeys is included in the latest equine Code draft, which is very helpful. It may be helpful to highlight these differences further, for example, in the Behaviour and Health sections of the document. Even if it is simply to provide a cross reference to the 'Sources of Information' section and 'The Donkey Care Handbook' published by The Donkey Sanctuary, it would also be helpful to advise that owners or keepers can seek advice about these animals' specific needs from their equine veterinary surgeon.
- **Summary Versions of the Codes:** The current versions of the Codes of Practice for the Welfare of Cats, Dogs and Rabbits have summaries. If these are to be retained³ it would be helpful to adopt the same approach with the equine Code depending on how accessible the Code will be online.

¹ Only 13 percent of people in Wales Cymru poll, were aware about the existence of these guides on how their pets should be legally taken care of. These figures are from YouGov Plc. Total sample size was 1,103 adults. Fieldwork was undertaken between 10–13 January 2017. The survey was carried out online. The figures have been weighted and are representative (politically) of all Welsh adults (aged 18+).

² Donkey Sanctuary (2015). Donkey Care [Handbook](#). 4th Edn.

Burden, F., du Toit, N., Thiemann, A. (2013) Nutrition and dental care of donkeys. *In Practice*, 35(7), 405- 410. Burden, F. and Thiemann, A. (2015). Donkeys are different. *Journal of Equine Veterinary Science*. Volume 35, Issue 5, Pages 376–382.

Burden, F. (2012). Practical feeding and condition scoring for donkeys and mules. *Equine Veterinary Education*, 24(11), 589-596.

³ At the time of writing a new draft dog code has been released for consultation and a new cat code is expected in the near future.

No	Section	Current Text	Comments
1	Intro P.4 Duty of Care P.6 Last paragraph	In this Code "horse" is intended to cover all domestic horses, ponies, donkeys, and hybrids between them. This word will be used throughout, except where donkeys' needs are different. Horses, ponies, donkeys and similar animals must have a horse passport	To ensure consistency of language and understanding throughout the equine Code, the first sentence of the 'Introduction' (page 4) explains how the equine species will be described, except where donkeys' needs are different but in the Duty of Care section (page 6, last paragraph) the description is 'similar animals'. It may be better to either retain 'horses' (meaning all equines as defined on P4) or restate all that applies.
2	Duty of Care P.5 3rd Para	More information about the welfare provisions of the Animal Welfare Act 2006, and more details of the responsibilities of a horse keeper, can be found in Appendix 3.	Should this reference be Appendix 2 and not Appendix 3?
3	Section 1. Environment P.9-10	PASTURE 1.12 Fencing should be robust and of sufficient height to prevent horses from escaping (for example higher fences may be required for stallions) and designed, constructed and maintained to avoid the risk of injury with no sharp projections. Gateways should be designed to allow for the easy and safe passage of horses, and gates should be fastened securely to prevent injury and escape. In some situations gates may need to be padlocked. Barbed wire should not be used in fields used by horses. Fencing such as sheep or plain wire, not designed primarily for horses, can cause injury	1.12 In this paragraph, it might be helpful to advise that fencing should be checked on a daily basis i.e. to ensure that there is no evidence of damage that could cause either injury to a horse or provide a means of escape
4	Section 1. Environment P.10	PASTURE 1.14 Electric fences should be designed, installed and maintained so that contact with them does not cause more than momentary discomfort to the horse; all power units should be correctly earthed. Horses contained by electric fencing need extra supervision until they become accustomed to it.	1.14 In this paragraph, it might be helpful to advise that electric fences should be tested regularly, using appropriate equipment, to ensure that they are working correctly (i.e. in order to avoid injury to a horse and to prevent escape).
5	Section 1 Environment P.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.	1.16 In this sentence, for clarity, it might be best to remove 'and' so that it reads '...most horse welfare organisations'
6	Section 1 Environment P.11	RUGS AND HOODS: 1.21 Young, healthy donkeys are extremely unlikely to need a rug, as they should always have access to a field shelter or stable. However, donkeys that are old, sick, underweight or clipped are more susceptible to cold and might need a rug at certain times of the year.	1.21 In this sentence, the RSPCA would prefer to see the wording of the Donkey Sanctuary's Donkey Care Handbook 136 adopted i.e. <i>Young, healthy donkeys are extremely unlikely to need a rug but, because of the donkey's lack of waterproof coat, they should always have access to a field shelter or stable.</i> This will help reinforce the point on shelter made under Section 1, 1.2.

7	Section 1 Environment P.11	<p>RUGS AND HOODS</p> <p>1.23 Rugs should be cleaned and, if necessary, repaired regularly and all fastenings kept in good working order. A spare rug should be available to allow a very wet rug to be dried.</p>	<p>1.23 In this paragraph it might also be helpful to add that, as well as cleaned and repaired, if necessary, some turnout rugs may also need to be 'reproofed' i.e. to maintain any water resistant barrier of the rug.</p>
8	Section 1 Environment P.12	<p>SUPERVISION:</p> <p>1.24 Horses at grass should, as a minimum, be inspected at least once a day, preferably more often. Stabled or group - housed horses should, as a minimum, be inspected at least twice a day, again preferably more often. Particular attention should be paid to their gait, demeanour, feet, body condition and appetite so that early signs of disease, injury, illness or parasites can be noticed and appropriate treatment promptly provided. Close examinations should also be conducted at regular intervals in order to identify any problems (e.g. skin conditions) that may not be apparent from a distance.</p>	<p>1.24 In this paragraph it may be prudent to confirm if the list of signs (which may indicate poor health) should be equivalent to the information provided in 'Section 5. Health, point 5.3'. For example, 1.24 does not mention behaviour or faeces and urine. Or, would it be appropriate to provide a cross reference to Section 5. for further information.</p>
9	Section 2 Diet P.13	<p>WATER</p> <p>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.</p>	<p>2.4 In the last sentence of this paragraph - to reinforce (and in line with) 2.2 and 2.3 - insert 'clean, fresh' before water in the last sentence. It may also be appropriate to highlight that buckets should be checked regularly 'on a daily basis' or 'throughout the day'.</p>
10	Section 2 Diet P.14-18	<p>FEED</p> <p>2.11 The weight and condition of every horse should be monitored regularly to avoid welfare problems. Feeding should be adjusted as necessary for animals that are too fat or too thin. It is important when feeding that horses are treated as individuals and provided with a tailor-made diet.</p> <p>2.12 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</p>	<p>2.11 In this paragraph, it might be useful to highlight that owners/keepers requiring more detailed guidance about the weight and diet of their horse or donkey should seek advice from their equine veterinary surgeon in the first instance. This suggestion is made as weight gain or weight loss may sometimes be indicators of a welfare/health concern – as described in point 2.12 and highlighted in Section 5. Health. Point 5.3. The Donkey Sanctuary also provides detailed information on this subject⁴.</p> <p>It would be helpful to amend the text to include an introduction explaining the purpose and use of the Body Condition Score Charts for Horse and Donkeys included on pages 15 to 18. Information on this subject is provided in The Equine Industry</p>

⁴NEWC (2009). Equine Industry Welfare Guidelines Compendium for Horses, Ponies and Donkeys (3rd Edition). HEALTH & WELFARE: Weight and Condition Scoring
 Burden, F., du Toit, N, Thiemann, A. (2013) Nutrition and dental care of donkeys. In Practice, 35(7), 405-410.
 Burden, F. (2012). Practical feeding and condition scoring for donkeys and mules. Equine Veterinary Education, 24(11), 589-596.
 Donkey Sanctuary (2015) Donkey Care Handbook 4th Edn.

		<p>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.</p>	<p>Welfare Guidelines Compendium (NEWC, 2009) and by The Donkey Sanctuary in various publications. Again, it might be useful to advise that owners or keepers requiring more detailed guidance about how to use these charts for their own individual equines, as part of a weight and condition monitoring plan, should seek advice from their equine veterinary surgeon in the first instance. If possible, it would be helpful to provide more up to date 'Body Condition Score' diagrams and images.</p>
11	Section 3 Behaviour P.19	<p>BEHAVIOUR 3.1 This section offers guidance on your equine's behaviour.</p>	<p>3.1 to 3.6. It might be beneficial to add some introductory advice on equine behaviour. It would be helpful to include a sentence emphasising the importance of understanding the species-specific behaviours of horses, donkeys and mules. These are vital to recognise in order to meet an individual animal's health and welfare needs.</p> <p>It would also be helpful to add similar advice to the beginning of this section as is already given in the Introduction, page 4, paragraph 4, i.e. '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'.</p> <p>It may also be helpful to add that owners or keepers with any concerns about a horse or donkey's behaviour may need to seek advice from their equine veterinary surgeon, for example, to rule out if the cause is pain related. This could be accompanied with a cross-reference to Section 5., 5.3 and 5.4.</p>
12	Section 3 Behaviour P.19	<p>HANDLING & RESTRAINT 3.7 Any restraint method used to assist normal management or treatment of a horse should be the most mild and effective method available, and should be applied by a competent person only for the minimum period necessary. Sedative drugs can only be prescribed by a veterinary surgeon, for a horse under their care.</p>	<p>3.7 It could be appropriate to also include this paragraph in Section 5. Health, or, at least, include a cross reference to Section 5.</p>
13	Section 4 Company P.21	<p>SOCIAL BEHAVIOUR Current draft Code text: Points 4.3 to 4.6 AWN draft text: Point 4.5 (page 26) 'When living in groups, horses always develop a pecking order, so it is important to be aware of behavioural conflicts'</p>	<p>4.3 to 4.6 It may be beneficial to keepers/owners if the wording 'it is important to be aware of behavioural conflicts within a group of horses', or similar wording, be used. It is very important to identify if any horses within a group are incompatible, or become incompatible, for whatever reason. This is to protect the health, safety and welfare of the horses in the group and the humans handling them.</p>
14	Section 5 Health P.22	<p>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:</p> <ul style="list-style-type: none"> • changes in demeanour or behaviour; 	<p>It would be helpful to include a sentence emphasising the importance of understanding the complex species-specific health and welfare guidance for horses, donkeys and mules. Research has identified some specific variations between these equine species⁵.</p>

⁵Burden, F. and Thiemann, A. (2015). Donkeys are different. *Journal of Equine Veterinary Science*. Volume 35, Issue 5, Pages 376–382.

Burden, F. (2012). *Donkey Sanctuary (2015). Donkey Care Handbook*. 4th Edn.

Burden, F., du Toit, N., Thiemann, A. (2013) Nutrition and dental care of donkeys. *In Practice*, 35(7), 405-410.

Practical feeding and condition scoring for donkeys and mules. *Equine Veterinary Education*, 24(11), 589-596.

		<ul style="list-style-type: none"> • changes in appetite (for food and water); • signs of pain or lameness; • the presence of any injury; • unexpected weight loss and changes to coat condition; • changes in body temperature, pulse, breathing rate; and • changes in faeces and urine. 	5.3 Bullet point 5. 'unexpected weight loss and changes in coat condition' could also include unexpected 'weight gain' i.e. a change in weight in either direction.
15	Section 5 Health P.22	<p>ROUTINE HEALTH CARE</p> <p>5.7 Horses are very susceptible to tetanus and all should be vaccinated against this potentially fatal condition. A vaccination programme should be discussed and agreed with a veterinary surgeon and then implemented.</p>	5.7 Vaccination: Infectious disease prevention and biosecurity protocols are vital considerations in the care of horses, as already identified in the Code, Section 5. Points 5.11 to 5.19. Therefore, it may be important to highlight that horses can also be vaccinated against some infectious diseases, such as equine influenza, and that owners should seek advice from their equine veterinary surgeon to determine what is appropriate for their individual horse ⁶ .
16	Section 5 Health P.22-23	<p>ROUTINE HEALTH CARE</p> <p>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 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.</p>	5.8 Equine Dentistry - it may be beneficial to highlight age as a factor in dental considerations in horses, which may require more regular monitoring (ideally 6-monthly), as per the advice provided by the British Equine Veterinary Association (2016) guidance ⁷ .
17	Section 5 Transporting Horses P.26	<p>Transporting Horses</p> <p>5.23 The transportation of horses should always be as safe and stress free as possible and in accordance with current rules and regulations. See appendix 2 for more information.</p>	5.23 In this Section, it would be helpful to include a brief summary of the factors to consider when planning to transport horses or donkeys, in order to ensure their welfare needs are met during any journey (short or long), for example, giving adequate consideration to the animal's requirement for feed, water and rest, that the vehicle is safe and in good working order, including passport requirements, etc ⁸ . In addition, careful consideration should be given to any specific welfare requirements, for example, if transporting pregnant mares (pregnant or with a foal at foot), suckling foals, or donkeys and their bonded companions ⁹ .
18	Appendix 1 Tethering P.27	<p>Tethering Introduction para:</p> <p>Tethering should not be used as a long-term measure to control horses as</p>	Tethering remains one of the most prevalent welfare issues RSPCA Inspectors deal with in Wales concerning horses ¹⁰ . Whilst it remains legal to tether a horse it would be helpful if it did

⁶Liphook Equine Hospital (2017). Vaccination. Available at: <http://liphookequinehospital.co.uk/liphook-equine-practice/veterinary-services/vaccinations/>. BEVA (2016). Resources for Owners – Maintaining a Healthy Horse – Routine Vaccination of Your Horse

BEVA (2015). Checklist for Equine Health 04/2013

⁷Dental Care: BEVA (2016). Maintaining a Healthy Horse. Dental Care. Available at: <https://www.beva.org.uk/Home/Resources-For-Owners/Guidance/Maintaining-A-Healthy-Horse>

⁸NEWC (2009). Transportation. In Equine Industry Welfare Compendium for Horses, Ponies and Donkeys (Third Edition). Donkey Sanctuary. Donkey Care Handbook. 4th Edn. (2015).

⁹Bonding Behaviour in Donkeys. page 27. Available at: <http://www.thedonkeysanctuary.org.uk/donkey-care-handbook>

¹⁰<https://www.rspca.org.uk/adviceandwelfare/pets/horses/health/tethering>

		<p>this can lead to a failure to meet a horse's basic welfare needs as set out in the Animal Welfare Act (2006).</p>	<p>not appear, in any way, to be a recommended or acceptable way to keep a horse long term, which is sadly often the case. For this reason we propose the opening paragraph is strengthened, perhaps with wording such as 'Tethering should never be used as a long-term measure in keeping/owning horses as this can lead to a failure to meet a horse's welfare needs as set out in the Animal Welfare Act (2006). This can lead to prosecution. If a horse needs to be tethered for grazing it must only be for short periods of time. For the remainder of the day the horse should have access to shelter, and a space to run free and interact freely with other horses.'</p>
19	<p>Appendix 2 The Law P.30</p>	<p>Offences and Penalties: A person who is convicted of an offence under section 4 of the Act may be imprisoned for a maximum period of 51 weeks and/or fined. If they are convicted of an offence under section 9 (failing to ensure the animal's welfare) they can be imprisoned for the same maximum period and fined up to level 5 on the standard scale.</p>	<p>The reference to 51 weeks maximum custodial sentence, whilst correct as it reflects the wording of the Act, is misleading due to custody plus and as such the maximum custodial remains at 6 months. Sentencing is an emotive and very topical issue in Wales - a 2017 YouGov poll for RSPCA Cymru found that 80% of people in Wales support the maximum sentence being increased to a prison term of five years¹¹. The UK Government has announced such an increase to five years in England, and we have called upon the Welsh Government to ensure the same increase is available to the courts in Wales.</p>
20	<p>Appendix 3 Sources of Information P.33</p>		<p>LEGISLATION: Here it may be useful to provide details of the website link to the relevant legislation section of the Welsh Government's website. This could be particularly helpful given the impact Brexit may have on this area of policy, given there could be a delay to updating the Code itself. Although included in Appendix 2, the Control of Horses Act (Wales) 2014 is missing from the list of current legislation here.</p> <p>USEFUL PUBLICATIONS: It may be helpful to confirm whether this list includes the most relevant and up to date publications available. For example, some of the book titles listed under British Horse Society Publications and Pony Club Publications may no longer be available to purchase from the British Horse Society Bookshop. The list may require updating to include the details of the most relevant and up to date documents. The Donkey Sanctuary: It would be extremely beneficial to add The Donkey Care Handbook to the Useful Publications list. This can be found on the website of the Donkey Sanctuary. British Equine Veterinary Association: It may be appropriate to confirm that the Horse Care Guide is still available or whether it has been superseded by another publication. BHS Welfare Leaflets: It is very helpful that the Code highlights the availability of BHS Welfare leaflets. Would it be possible to add that other organisations, such as World Horse Welfare and The Blue Cross and The Donkey Sanctuary provide similar information, as does the British Equine Veterinary Association.</p> <p>LOCATING A SPECIALIST VET: It would be helpful if the Code included relevant contact information to enable keepers to easily locate an equine veterinary surgeon i.e. via the BEVA (Vet Practice Directory) and RCVS (Find a Vet) websites. This information signpost is included in the dog and cat Codes.</p>

¹¹ These figures are from YouGov Plc. Total sample size was 1,103 adults. Fieldwork was undertaken between 10–13 January 2017. The survey was carried out online. The figures have been weighted and are representative (politically) of all Welsh adults (aged 18+)

Additions for consideration		
21	Section 5 Health & Welfare Euthanasia	<p>EUTHANASIA:</p> <p>In the previous version of the Code, the subject of 'Euthanasia' was included and should be reinstated in the new draft. Euthanasia is an important equine welfare subject to talk about. A horse's welfare needs must always come first to avoid any unnecessary suffering for the animal. Understandably though, euthanasia can be difficult for owners to contemplate; whether in an emergency or in a non-emergency situation. In the first instance, to help owners be as prepared as possible in advance, in particular for those individuals who would like to seek advice on this subject, it would be useful to include a recommendation that any concerns about euthanasia should be discussed with their equine veterinary surgeon. To help owners further, it would be beneficial to state that some equine welfare organisations provide invaluable information on euthanasia (both in print form and online). Several offer a range of confidential telephone helpline and support services, which can give guidance on this subject. These include the British Horse Society, World Horse Welfare, the Blue Cross. It would be helpful to provide the details of how to access this advice, which could be listed in the "Sources of Information" at the end of the Code¹².</p>
22	Section 5 Health & Welfare Breeding	<p>BREEDING:</p> <p>The RSPCA and indeed the wider equine welfare sector has recognised that the overproduction of horses is a significant welfare problem. Owners/keepers of horses should be clearly advised against indiscriminate breeding. It may be helpful to provide some guidance on this subject, such as:</p> <p>Anyone thinking of breeding horses should be advised to carefully consider the implications of doing so. For example, owners should take into account the animal's' health, conformation, temperament; whether they can actually meet the health and welfare needs of the mare and foal; if they have the knowledge, experience, time and financial resources needed to both breed and care responsibly for the animals concerned over a long period of time. Owners should be encouraged to seek advice from their equine veterinary surgeon before they embark on breeding a foal. The 'Do You Need to Breed?' campaign from World Horse Welfare and the 'Think Before You Breed' campaign from The British Horse Society both provide informative publications on this subject. This information is published on their respective websites. It might be relevant to provide the appropriate links, perhaps in the 'Sources of Information' Section of the document¹³</p>

¹² BEVA (2015). Having your Horse or Pony Humanely Destroyed. Available at: <https://www.beva.org.uk/Home/Resources/Resources-for-Owners/Humane-Destruction>. British Horse Society. Friends at the End. Available at: <http://www.bhs.org.uk/welfare-and-care/euthanasia-and-friends-at-the-end>. Blue Cross (2015). Euthanasia and Horses. Available at: <https://www.bluecross.org.uk/pet-advice/euthanasia-and-horses> World Horse Welfare. Just In Case. Available at: <http://www.worldhorsewelfare.org/just-in-case>.

¹³ British Horse Society. Think Before You Breed. Available at: <http://www.bhs.org.uk/welfare-and-care/our-campaigns/think-before-you-breed>. World Horse Welfare.. Do You Need to Breed. Available at: <http://www.worldhorsewelfare.org/Needtobreed>. BEVA. BREEDING. Available at: <https://www.beva.org.uk/Home/Resources-For-Owners/Guidance/Breeding>