

Voluntary Initiative on the Welfare of Equids

Recommendations for the upcoming Animal Welfare legislation

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Kept animals regulation

1. Definitions and scope

The proposed new Regulation on animals kept for commercial purposes offers an opportunity to enlarge the scope of application of Directive 98/58, ensure a greater number of equidae are protected, include improved evidence-based standards for the keeping and care of all equidae to better fit with their needs (as outlined in the 5 Domains model and the 3-Fs concept - Friends, Freedom and Forage), as well as enshrine equid species-specific provisions in subsequent tertiary law.

All equidae traded for the purposes of human companionship, involved in competition and/or leisure should be included within the definition of 'kept for commercial purposes'. These include equids used for production of milk or meat, in the leisure industry, for example, in riding schools, for sporting purposes, for equid-assisted therapy and working equids used in tourism, agriculture, forestry, and waste management. In addition, it is important to keep in mind the role played by all equids in agricultural land management.

More specifically, equids used in sport, competition, or cultural events are excluded from the current Directive. Equids can have multiple functions throughout their lives, so the new legislation should expand the scope to include all equids. It always remains open to people to voluntarily provide additional levels of care to equids, however there is no evidence that the essential of equids differ depending on their purpose or use.

Members highlight that semi-wild equids kept and managed should be considered within the scope of the regulation. On the contrary, it is admitted that wild equids, meaning equids that are not kept, even if they are managed to some degree, will be excluded from the scope.

Due attention should be given to the framework of Regulation (EU) 2016/429 ('Animal Health Law'), in particular with regards to the registration and approval of establishments keeping equidae.

If all equidae cannot be considered in the regulation for genuine legal reasons, it is recommended that member States adopt similar provisions to protect the welfare of other equids that fall outside of the scope of the regulation.

Voluntary Initiative recommendations:

All equidae, regardless of the purpose for which they are kept or managed at a particular instance of their lives, should be included within the scope of the 'Kept Animals Regulation'. There is an explicit or implicit commercial or economic aspect to the breeding, rearing, use and keeping of domesticated equids. An exception is accepted for 'wild' or 'feral' equids, except if they are kept or managed.

Proposed definitions:

'equid animal' and 'equidae' mean a kept domesticated animal of species belonging to the genus *Equus*, including horses and donkeys (asses), and the offspring of crossings of these species which are hybrids.

The regulation should be based on the Five Domains and as such give due recognition to the importance of mental as well as physical well-being of the animal.

2. Water & Feed

The Guides to the care and welfare of horses, donkeys and their hybrids previously developed by the Voluntary Initiative provide detailed information on the quantity, frequency and quality of feed that should be administered to these different species.

The members also generally agreed with the provisions in Directive 98/58 that could be applied as general principles to equids. However, it is essential for future legislation to clearly establish different requirements depending on the species, use and age.

Voluntary Initiative recommendations:

Equids should be fed a wholesome diet consisting of fibre and forage appropriate to their age and species and which is fed to them in sufficient quantity to maintain them in good health and satisfy their physiological and nutritional needs to avoid malnutrition, poor condition or obesity. No animal should be provided with food or liquid in a manner, nor should such food or liquid contain any substance, which may cause unnecessary suffering or injury.

Equids should have access to a suitable diet including a sufficient amount of roughage and at intervals appropriate to their physiological needs and workload. The maximum period of time, where equids do not have access to roughage, should not exceed four hours.

Equids should have access to a suitable supply of clean, fresh water. During winter with temperatures below zero precautions should be taken to ensure this. If electrically heated drinkers are used, precautions need to be taken to avoid any dangers associated with them. Feeding and watering equipment should be well-maintained and kept clean. It should be designed, constructed and located such that contamination of feed and water and the harmful effects of competition between equids are minimised.

No other substance, with the exception of those used for therapeutic, or prophylactic purposes or for the purposes of zootechnical treatment as defined in Article 1(2)(c) of Directive 96/22/EEC (1), should be administered to an equid unless it has been demonstrated by scientific studies of animal welfare or established experience that the effect of that substance is not detrimental to the health or welfare of the equid.

2. Indoor environment

The Guides to the care and welfare of horses, donkeys and their hybrids previously developed by the Voluntary Initiative provide detailed information on design, dimensions, climate and other considerations to guarantee the welfare of all equid species.

Voluntary Initiative recommendations:

Indoor accommodation should be of sufficient dimension to fit the size of the equid so that, at all times, the equid is able to lie down easily, rest in a natural position, turn around if not tied, get up unimpeded, and stand in a natural position. The individual loose box should be of larger size if the horse is stabled for a major part of the day. The lying area of any accommodation should be provided with an adequate amount of suitable and dry bedding, so that the animal can lie comfortably.

In indoor accommodation, dust levels, relative air humidity, temperature and gas concentrations should be kept within appropriate limits through the provision of proper and adequate ventilation and waste management.

Equids should preferably be kept in stable groups and they should have access to physical, or at least visual, auditory and olfactory contact with conspecifics (animals from the same species).

Husbandry systems severely restricting the movement of equids such as hobbling and permanent tethering should not be used, except as required under veterinary supervision.

3. Outdoor environment

The members highlight the essential need for outdoor accommodations to provide sufficient and adequate shelter whether it is man-made or natural. More specifications on the requirements for shelters can be found in the guides to the care and welfare of horses, donkeys and their hybrids. Drainage of the pasture and dry floor is also key for the welfare of equids to avoid them standing in muddy conditions for the majority of their day.

Voluntary Initiative recommendations:

The pasture or other outdoor accommodation should be adequate to the needs of the equid. The area of pasture required per equid will depend on the equid species, number of equids, type of grass, ground conditions, time of year, and degree of pasture management employed.

In outdoor accommodation, equids should be provided access to sufficient shelter from adverse or extreme conditions including temperatures, weather conditions, biting insects and predators.

Equids should have access to a well-drained space.

Equids should preferably be kept in stable groups and they should have access to physical, or at least visual, auditory and olfactory contact with conspecifics.

4. Training of responsible persons

The members highlight the necessity to establish training and certification requirements for the keeping of equids.

The person for whom a certificate is required should be the keeper handling the animal. In particular, there should be a certified responsible person in each establishment that accommodates equids. The provisions should accommodate the fact that volunteers, school kids and trainees are often taking care of the equids, especially in riding facilities, in which cases, a certificate may be inappropriate or should recognise different levels of competence.

Members consider that a certificate and training requirement for the keeping but not necessarily for the owning of an equid is appropriate as it is essential that those with responsibility for keeping equids are appropriately skilled.

It is important to ensure that the training and certification requirements do not prevent the possibility to prosecute the keeper for any mistreatment or abuse of the animals. It is possible to examine equids to determine whether the keepers are properly caring for them.

Consideration should be given to different types of training for different responsibilities or roles in the care of equids. In this context, members emphasise that training requirements should be harmonised across Member States.

Members highlight that certification requirements with regards to the keeping of dogs in some Member States could be a useful starting point.

Voluntary Initiative recommendations:

Personnel in establishments in which equids are kept should possess the appropriate skills and knowledge, and have received specific training, or have acquired the equivalent practical experience, in handling of equids according to their role and the equid species under their care. One responsible person within each registered establishment keeping horses should have certification in the care, training and handling to understand the physical and behavioural needs, and assess and identify potential physical and mental risks of the equid species under their responsibility.

Standards of training/certification should be harmonised across Member States, including standards related to those who provide training.

5. Enrichment

Members consider that enrichment provisions should not be included within the scope of the regulation because such devices or methods should not replace good husbandry and optimal living conditions.

Voluntary Initiative recommendations:

No provisions on enrichment should be included - equids should be provided with an appropriately 'rich' environment in which to live a good life.

6. Interactions with conspecifics

Members note the necessity to ensure that horses, donkeys and their hybrids are kept with conspecifics, taking into consideration their need, as gregarious animals, to have social contact with other equids in preference to other species. The preferences of mules and hinnies may differ, for instance, mules may be more comfortable with horses and hinnies more comfortable with donkeys. It was also noted that bonding with a conspecific is more important for donkeys than for horses and should be addressed in the legislation.

The question of the keeping of stallions in pastures with other horses was raised. It was mentioned that stallions might be kept at pasture with other horses if used to them, and that they should, at a minimum, be placed in paddocks where they can see other horses.

In addition, it is relevant to consider the numbers of animals as well as composition of the group at pasture in order to better manage the risk of injuries.

Voluntary Initiative recommendations:

Horses, mules and donkeys should, at least during a part of the day, have full physical contact with conspecifics, in a paddock, pasture or in group housing. Social interaction is especially important very early and also later in life.

Due attention should be accorded to the species e.g. the preferential bonding of donkeys to other donkey companions and the varying preferences of hybrid species.

7. Biosecurity and disease prevention e.g. vaccination

Voluntary Initiative recommendations:

Broad principles of biosecurity and disease prevention should apply for all equids as for livestock species; the detail is more properly contained in the Animal Health Law.

8. Injury & illness treatment

The question on whether injury and illness treatment falls within the scope of the regulation was raised. It was concluded that husbandry and monitoring related to the health of equids should be relevant to the regulation, while the Animal Health Law would focus on the sanitary aspects.

Members emphasise the need to ensure that people responsible for and handling equids are trained and have appropriate knowledge on these questions.

Voluntary Initiative recommendations:

The person responsible for the establishment in which equids are kept should conduct at least daily inspections to identify any sign of illness or injury, as well as behavioural signs of mental discomfort.

In the case of suspicion of illness or injury, inspections should be conducted more frequently.

An equid that appears ill or injured should be given appropriate care without delay. If the equid does not rapidly respond to such care, a veterinarian should examine the equid.

Facilities for temporary isolation of ill or injured equids should always be available.

9. Hoof care and routine husbandry

The Guides to the care and welfare of horses, donkeys and their hybrids previously developed by the Voluntary Initiative contain relevant information on equid husbandry, especially in relation to hoof care.

Members note that recognising the need for hoof and dental care are important elements to be considered in the training of keepers. It is also important to consider the different needs depending on the species (e.g. trimming interval is different for horses and donkeys). Routine dental care is often provided competently by trained equid dental technicians (sometimes also termed dentists) and does not need to be performed solely by veterinarians; however the latter are essential to the diagnosis and treatment of dental disease.

Members mention that parasite control is an important part of routine husbandry and raise the question on whether specific provisions on parasite control should be included in the regulation, in light of the Animal Health Law.

Voluntary Initiative recommendations:

Only trained and competent persons with adequate species-specific knowledge should be allowed to trim equids. Only trained professionals should be allowed to shoe equids. Equids should have their feet trimmed at regular intervals depending on their needs.

Only trained and competent persons with adequate species-specific knowledge should be allowed to perform routine dental care for equids. Only trained veterinary professionals should be allowed to perform complex dental care. Dental care on equids should be performed regularly, for example annually, depending on their individual needs.

Appropriate attention should be paid to disease prevention including parasite control where growing drug resistance increases the need for testing, grazing management and targeted treatments.

10. Physical and mental fitness

Members highlight the need for equids, especially horses, to exercise during the day. In this regard, it is important for equids not to be kept all day in indoor accommodation, or a restricted area.

Physical and mental fitness is especially relevant for horses involved in competition. It is important for such horses not to compete before they have undergone a full physical and mental training enabling them to compete in safety.

Voluntary Initiative recommendations:

For their physical and mental fitness and wellbeing, equids should have access to conspecifics, to forage and be able to exercise at least part of the day as free movement in a pasture or paddock, preferably with conspecifics, in addition to any other physical activity asked of them.

Equids should not participate in competitions, races, shows, training and hauling until appropriately trained and both physically and mentally fit for purpose.

11. End-of-life

Members express concerns over the fact that some owners have difficulties letting their animal go even when the animal is suffering. As a consequence, it is essential for the upcoming animal welfare legislation to address these concerns.

With regards to the competent person performing the euthanasia, it was agreed that chemical euthanasia, requires the supervision of a veterinarian while it is not similarly mandated for non-chemical methods.

Voluntary Initiative recommendations:

Killing should always be performed when an equid is suffering and is not responding to treatment, or when an equid has a chronic and incurable condition which causes pain or distress, in consultation with a veterinarian. The method used should be humane ensuring minimum suffering to the animal and the person performing the killing should have the necessary competence, as laid down in relevant legislation e.g. Reg 1099/2009 on the welfare at the time of killing.

12. Education of equids and handling techniques

This section relates to the education of equids and differs from physical training, also called physical fitness and covered by section 10.

Members highlight the importance for education to be based on scientific principles and Learning Theory principles. Using such principles enables the Regulation to be future-proofed and adapt to most recent scientific findings.

Punishment of equids is to be discouraged and members highlight the need to preserve the welfare of equids during education.

Some members mention that significant problems can arise when handlers try to remove bonded equids from the company of other equids. An equid needs to be gradually used to being isolated from other equids. This should be carefully considered in the legislation. It is also important to train equids for transport.

With regards to the age and education of young equids, members point out that handling foals from an early age is different from imprinting; they recommend the former but not the latter.

Voluntary Initiative recommendations:

Equids should be handled, but imprinting avoided, from an early age and equids should not be forcibly separated, from their dam (if unweaned) or from bonded companions, except on veterinary advice.

Education methods should be appropriate to the age, physical and mental capacity of equids to protect them from pain, suffering, anxiety, injuries and permanent disability.

Education should be based on the principles of learning theory.

During their education, equids should be gradually accustomed to the equipment used in training, including transport vehicles, and to separation from other equids.

Equids should be handled by competent handlers with care and patience.

13. Mutilations

Mutilations such as whisker trimming, nicking of tendons and tail docking are not acceptable husbandry practices for equids. Castration should be addressed in the legislation. Members insist that mutilations should not be exhaustively listed in the legislation so that it can be future proofed and able to address potential new forms of mutilations. In this context, the list provided in the recommendations section is only an indication and only covers examples of mutilation practices.

It was mentioned that, in the EU, branding is authorised for feral animals, and this cannot be addressed in the Kept Animals Regulation that would only cover domesticated equids.

Voluntary Initiative recommendations:

Mutilations (e.g. hot branding, tail docking, tendon nicking, whisker trimming, denervating) should not be performed unless for veterinary reasons.

Castration should be performed by a veterinarian with the use of appropriate pain management.

The veterinarian who performs a mutilation should record the procedure in the equid identification document.

14. Equipment

The Guides to the care and welfare of horses, donkeys and their hybrids previously developed by the Voluntary Initiative provide detailed information on equipment that should be used on equids and form the basis of the recommendations.

Members emphasise that bits must be used in a correct way and not as a coercive measure.

Voluntary Initiative recommendations:

All equipment used to manage equids should be adapted to the animal, used appropriately and never cause harm, pain or suffering, nor should it be used to prevent or mask conflict behaviour.

Equipment should not be used in a forceful way acting as a coercive measure.

All equipment should be kept safe, functional, clean, and well maintained. Equipment should be regularly checked, including before use and be appropriately adjusted to the equid concerned. In particular at competitions, equipment should be checked so as to detect injuries, for example to the mouth.

Equipment should be used with care and patience. It is the responsibility of the handler or rider to ensure sufficient and updated knowledge about equipment and tack and the correct use of equipment before applying it on an equid.

15. Breeding

The focus of breeding should be on maintaining health so that healthy offspring follow. It is also important for breeders, and the legislation, to consider the whole life of the equid, including before and after the breeding period.

The Guides to the care and welfare of horses, donkeys and their hybrids previously developed by the Voluntary Initiative provide recommendations on responsible breeding and breeding methods that can inform the legislation.

Members also discussed artificial breeding technologies and mentioned that their benefits for equid welfare in all cases is uncertain.

In order to be future-proof, it is important for the legislation to include provisions stating that equids should not be bred unless their offspring can be kept in good conditions.

Voluntary Initiative recommendations:

Equids should not be bred in a manner that causes suffering.

Equids with heritable disorders (e.g., certain respiratory conditions), poor conformation or disagreeable temperaments should not be bred from, if it is likely that any undesirable traits will be passed on to any progeny.

16. Production of equine derived products

Discussions on this section focused on the use of equids in commercial and research situations and the animal welfare issues that may arise. Members highlighted the difficulty (for the equine species) in adopting requirements or conditions in this context and stressed the need for better protocols to safeguard equine welfare.

Members suggested that the use of equids in commercial/research situations could be discussed by the Voluntary Initiative in another context, unrelated to the discussions on the Kept Animals Regulation.

Voluntary Initiative recommendations:

Welfare standards should be established for equids used for commercial/research purposes and the welfare of these equids properly protected.

Transport regulation

All recommendations provided in this section apply to all equids, meaning horses, donkeys and donkeys hybrids, unless otherwise specified.

17. Journey times/limits, resting periods

Members highlight that there are often insufficient control posts. Additional and appropriate welfare rules should result in the need for more control posts. Currently, control posts are not always in suitable locations, and do not necessarily provide adequate conditions for the keeping of equids. It is therefore suggested to increase the number of such premises and adopt strategies to optimise their positioning and keeping conditions. In addition, it is recommended to give opportunity to other registered establishments to unload horses in order to maximise opportunities for equids to rest on their journey. However, it is essential that such premises allow equids to rest in optimal conditions, enabling them to lie down in a lateral position. The place of destination is the place where animals are unloaded for a minimum of 48 hours.

Members recommend not to establish a difference between 'registered' and 'non-registered' equids, as provided in the current legislation. It is necessary for these provisions to apply to all equids, regardless of their purpose or destination including if intended for slaughter. All transports for commercial purposes should be covered. The legislation should also apply to horses transported to sporting events and other equids transported for economic purposes (e.g. breeding). In this context, it is essential that the time spent at the sporting or equestrian event does not count as resting time. However, it remains essential for the place of destination to be clearly stated and accurate in the journey log for monitoring and traceability purposes (in some instances, horses destined to slaughter otherwise may not be properly declared).

The definition of journey time should be clear and a journey limit should be set. However, there is a need for derogations as it is difficult for some Member States such as Portugal, Greece and Ireland to implement such a limit because of geographical conditions.

Journey time should include time spent on a ferry, though it is acknowledged that this is problematic for some Member States where some ferry trips are themselves over 12 hours in duration. The text may need some adaptation to address these situations. When addressing transport by sea, all issues affecting the welfare of equids should be carefully considered.

When possible and permitted by the local authorities, vehicles transporting animals should be able to use emergency lanes in cases of traffic jams.

Voluntary Initiative recommendations:

Journey durations, rest periods and times should be clearly defined and acknowledge differences between Member States and thus also the varying views of members of the Voluntary Initiative.

A journey is from the place of departure to the place of destination, including any loading, all legs of the journey and any unloading occurring at intermediate points in the journey. Many VI members advocate but not all agree, that any leg of a journey by road should not exceed 12 hours for all equids. An additional two hours may be allowed to a leg, in emergency situations, so as to reach an appropriate place of unloading. Each leg of a journey should be followed by an appropriate resting period, unloaded in a registered establishment. Further scientific research is required to define appropriate journey and resting times so as to safeguard equine welfare.

During transport, equids should be offered water and feed as appropriate to their species and age, *ad libitum* or at suitable intervals though it is recognised that some equids may not drink during transport itself, thus leading to dehydration. For transport by road, water and feed should be provided at least every four hours for a period of 30 minutes while the vehicle is stationary.

The provisions of this regulation should apply to all equids, without distinction between 'Registered' and 'Non-Registered' Equidae. The essential needs of equids remain unaltered by the use to which they are put; it is always open to people to voluntarily apply higher standards of care for specific animals/groups of animals than is legally required.

18. Fitness for transport

Members emphasise that the key issue on fitness for transport is to clearly establish responsibilities and ensure that the persons assessing the fitness for transport are well-equipped and competent to make such decisions (see Section 22).

MSs have different rules on exports, some have bilateral agreements that remove the requirement for veterinary certification. These situations should be taken into consideration and addressed.

Members also mentioned that some horses who would be "unfit for longer journeys" could still undertake short journeys under certain conditions on veterinary advice.

Voluntary Initiative recommendations:

In the period immediately before or at the time of loading the equids in the vehicle at the place of departure, keepers and transporters, or a veterinarian for journeys above eight hours, should confirm that the equids are fit to undertake their journey. During transport, transporters should confirm that the equids are fit to continue their journey after they are unloaded for resting periods. For all journeys exceeding eight hours, the confirmation of continued fitness for transport should be recorded in the journey log.

If keepers and transporters are uncertain about the continued fitness for transport of the equids, they should seek the opinion of a veterinarian.

A contingency plan should be in place to modify the itinerary or the journey, if necessary (e.g. to address situations in which the animals become sick or have a traumatism during the journey).

Pregnant equids for whom 80% or more of the expected gestation period has already passed, or females who have given birth in the previous week should be deemed “unfit for transport”.

Equids otherwise deemed ‘unfit to transport’ can undertake short journeys for veterinary purposes or treatment, as necessary.

19. Temperature & ventilation

Temperature, ventilation, humidity levels and vehicle design should be addressed from a holistic perspective.

Humidity is a key issue, and is an important factor to determine the appropriate temperature. Therefore, the temperature should be combined with the humidity level. Members note that hot temperatures represent a higher risk compared to low temperatures. No lower temperature limit is therefore needed. However, it is essential to ensure that the water provided during the journey is not frozen. Similarly, it may be necessary to provide additional water than usual in higher temperature conditions to keep the equids well-hydrated.

EFSA’s recommendation of a critical temperature estimated at 25°C / 45% humidity level is difficult to comply with for Southern European Member States for the most part of the year, and for all Member States during hotter periods of the year. It is also recognised that acclimatised equids may cope better in temperatures above 25°C than equids accustomed to colder climatic conditions.

Members also note that the provisions should be future proof and able to accommodate upcoming developments in the field

Despite a lack of research, the use of air conditioning for the transport of equids that are not accommodated to it may have adverse effects on their health, such as respiratory diseases.

Voluntary Initiative recommendations:

Transport by road should be undertaken at the cooler times of the day.

Particular attention should be given to humidity levels, temperatures and ventilation, as well as conditions of transport, including vehicle design/selection and stocking densities of the equids, throughout the journey.

The temperature inside the vehicle should not exceed 30 degrees celsius for equids acclimatised to high temperatures and 25 degrees celsius for unacclimatised equids. If the outside temperature is higher, the vehicle could be equipped with ventilation systems or other mechanisms to keep the temperature below this threshold, giving due consideration to humidity levels and to potential adverse effects on the health of equids, based on research and latest evidence.

Habituation of the equids to the climate conditions should be considered in the fitness for transport assessment.

Monitoring the animals and behaviour changes during transport is important to see if there is any indicator of poor welfare. If there is, the keeper/transporter should assess what causes it and address the issue.

20. Space allowance - floor and height

Equids may suffer from bruises if they are kept in a too narrow space for transport. However, members are concerned that EFSA's recommendations for individual stalls to be "at least 40 cm larger than the width of the animal at its widest point" and to provide "40 cm of free space in addition to the body length of the horse measured from the tail to the nose while the neck is parallel to the ground" are not feasible as all trailers currently in use do not comply with these requirements and may be dangerous if the horse attempts to turn around, risking injuries, especially if the horse is not accustomed to travel. Otherwise, additional space may not be a welfare issue. An exemption for mares with foals should be considered, where additional space may be appropriate so that the foal can turn around but the mare cannot.

The other EFSA recommendations with regards to space allowance are broadly approved of.

Examples of minimum space allowance for individually transported horses (taken from the Swedish Ministry for Agriculture recommendations):

Horses	1,75 m ² (0,7 x 2,5)
Horses 6-24 months	1,2 m ² (0,6 x 2 m)
Ponies	1 m ² (0,6 x 1,8m)
Foals 0-6 months	1,4 m ² (1 x 1,4)

Voluntary Initiative recommendations:

Equids transported in individual stalls should be transported in such a manner that they cannot turn around. Horses should ideally be placed at an angle facing toward the rear of the vehicle. Exemptions can be allowed for group transport and for a foal travelling with their dam so that the foal can be allowed free movement.

Equids should not be transported in multi-deck vehicles except if animals are loaded on the lowest deck with no animals on the higher deck.

The minimum internal height of the compartment should be at least 75 cm higher than the height of the withers of the tallest animal.

Unhandled equids should be transported in a small group composed of compatible animals free to move around with a density of < 200 kg/m².

21. Interactions with other animals, tethering

Members emphasise that long term tethering can have a negative effect on the respiratory health of horses. In this context, members agree with EFSA's conclusions stating that "horses should be able to lower their head below the wither height to clear their respiratory tract, and this is impossible if they are cross-tied or tied short (<60 cm rope)". It is also essential to ensure that when animals are transported in groups, they are transported with familiar animals in order to prevent unexpected situations and potential injuries.

Voluntary Initiative recommendations:

Equids should not be tethered with the head elevated during transport.

Incompatible or unfamiliar equids should not be mixed in the vehicle during transport. After unloading, they should be kept in their stable groups with compatible animals.

22. Training of handlers/transporters/drivers

Members emphasise that rules on training should be harmonised across MSs, removing any ability for a MS to permit lower training standards and ensure that there is no room for interpretation on the rules. Currently, training is provided to drivers but not to organisers within transportation companies who deliver instructions that are not necessarily aligned with high animal welfare standards. It is essential that such training requirements apply to all transports and all who transport equids. In addition, training should include the use of non-coercive methods and tools, as recommended by EFSA. The training provided should be adapted to the audience, meaning to the role undertaken by the personnel.

Voluntary Initiative recommendations:

Keepers, handlers, drivers, transporters and organisers should undertake species-specific and adequate training on the behaviour of equids, handling and fitness for transport. In addition, transporters and drivers should be trained on vehicle safety, loading and unloading, and driver skills.

A certificate of competence should be delivered to all who have undergone training by the competent authority upon satisfactory completion of the above-mentioned training. The certificate of competence should be reviewed and subject to renewal where there is a significant change in legislation or official guidance, or otherwise at least every five years by the competent authority upon satisfactory completion of further training. The VI Members recognise that there is a resource implication to this recommendation.

Training should be up to date incorporating latest scientific evidence.

23. Monitoring

Members highlight that it is essential to improve monitoring by competent authorities. Monitoring should be proactive and real-time using modern technologies; the Regulation should be future-proofed to allow for updating as IT evolves and becomes more available and cost-effective to employ. For instance, members suggest to explore systems that would enable to directly link GPS to TRACES data.

Members also mentioned that currently, only official controls make retrospective checks which is insufficient to efficiently monitor the vast majority of transports. It was suggested that it could be the responsibility of the organiser to make controls on each transport for the duration of the journey, therefore operating a first level control, and leaving a second level control for law enforcement officials.

The new regulation should include welfare indicators to measure whether the objectives of the regulation have been met.

Voluntary Initiative recommendations:

Transport organisers should provide a journey log for all journeys exceeding eight hours.

The European Commission should conduct regular audits and reports to monitor the proper enforcement of the regulation. Member States should collect statistical data on the enforcement of the regulation and annually share this data. The European Commission should regularly publish a report based on audits conducted and the data received from all Member States.

Transport vehicles should be equipped with appropriate systems enabling accurate recording of microclimatic conditions, including temperature and humidity levels, at several locations, including as close as possible to the position of equids in the vehicle.

The European Commission should establish and regularly update a database of transporters that have failed to comply with the requirements laid down in the regulation.

Slaughter regulation

24. Antemortem standards - housing, inspections, grouping, handling

Slaughter for human consumption is considered one end-of-life possibility for equids. The main problem is the lack of specific legislation for equids. Interpretation of the current rules is different from one Member State to another (e.g., stunning boxes design, head restraining in the boxes which is inappropriate for equids, etc.). It is essential for provisions to be clear and harmonised across Member States.

Facilities in slaughterhouses do not always properly provide for equids. Lairages and stunning boxes, as well as other facilities, are usually designed for other livestock animals (e.g., cattle). As a consequence, the design and equipment are usually not suitable for equids. For instance, mixing incompatible horses and fights while waiting can cause huge stress and injuries, especially with unhandled horses.

The regulation governing slaughter should be future-proofed to easily include latest evidence on welfare at the time of killing.

The members generally support the use of CCTV, particularly in lairage facilities. Concerns were expressed about the use of CCTV at the point of slaughter. Members acknowledge limitations from Member States in implementing these measures.

The welfare during transport to the slaughterhouse is key to ensure the animals arrive in the best state possible to the slaughterhouses, minimising stress factors. The length of the journey can also impact the stress of the animals at the time of arrival.

With regards to traceability, the identity of the equid should be double checked and ensured before the equid leaves the lairage for the stunning box.

Reduced stress and better welfare is better for the quality of the end product.

Voluntary Initiative recommendations:

Regulation (EC) No 1099/2009 should be updated to include specific provisions for equids with regard to lairage facilities, passageways, and stunning equipment. Handling during arrival, moving and stunning should also be addressed.

CCTV should be introduced in lairage facilities and encouraged elsewhere.

Lairage should be as short and stress-free as possible.

25. Equid-specific training of personnel

Equid-specific training of all personnel who handle equids, including slaughtermen, is important (including practical training) and has to be regularly updated. People should be confident on how to handle equids, not only competent in handling them.

Voluntary Initiative recommendations:

It should be ensured that the training courses according to Article 21 of Regulation (EC) No 1099/2009 are **specifically** adapted to the slaughter of equids.

Training of inspectors should be improved to ensure better, more effective inspections at all slaughterhouses where equids are killed.

26. Slaughter techniques

There is a need for further research on stunning methods and determining loss of consciousness of equids at the time of slaughter.

Voluntary Initiative recommendations:

Pending further research.