

Britain's Horse Problem



From horse crisis to systemic failure – the need for owner accountability,
wider regulation and better enforcement in England and Wales



BRANSKY
HORSES



Introduction

A 'horse crisis' in England and Wales was declared by the major equine welfare charities in their reports *Left on the verge: the approaching equine crisis in England and Wales* (2012) and *Left on the verge: in the grip of a horse crisis in England and Wales* (2013), along with a series of recommendations on how the public, government, agencies and charities should help address the plight of several thousand horses with little or no financial value which were suffering or at risk of neglect and abandonment.

Like trying to drain a bath with the taps still on, no matter how much water escapes down the drain the water level remains unchanged

While equine charities have taken in thousands of horses each year since these reports were published, horses are being put at risk at least at the same pace as we are collectively able to rescue them. Like trying to drain a bath with the taps still on, no matter how much water escapes down the drain the water level remains unchanged.

As this constant cycle of equine welfare need is now persistent, it can no longer be deemed a 'crisis' but must be recognised as the result of systemic failure of ownership and enforcement. Our work is not done, and reforming this system must begin now if we take lessons from history. The 2012 equine crisis originally arose after the 2008 financial crash, and the expected severe recession brought about by Covid-19 is likely to cause the welfare 'bath' to overflow.

Charities have undertaken crisis management to the best of their ability over the past seven years. The sector remains over-stretched and under-resourced and the Covid-19 pandemic has placed serious additional burdens on every organisation. With a challenging winter ahead, it is vital that the current situation is assessed and the most important mitigating steps identified to help prevent large numbers of horses falling through the legislative safety net at the time when they need it most.

This report sets out the current situation, how changes in the law have helped and suggests further recommendations to help address the root causes – particularly around the fundamental need for better enforcement, licensing of equine establishments and new multi-sectoral approaches to resolving welfare cases.

This report focuses on equine welfare in England and Wales, however it includes references to Scottish legislation as horses are moved frequently across borders.



Have we made any progress?

Since 2014, significant progress has been made by charities and government to improve legislation relating to equines, including the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, the Equine Identification Regulations across England, Scotland and Wales and The Control of Horses (Wales) Act 2014 and Control of Horses Act 2015 (England), laws which made it easier to resolve cases where horses were left on others' land without permission (fly-grazing). The authors of this report also fully support the anticipated EU Animal Health Law 2021 and subsequent registration of equine premises, and strongly encourage English, Welsh and Scottish governments to implement it regardless of the future relationship with the EU as its provisions would be a significant step in regulating a largely invisible and uncontrolled sub-sector of the horse industry.

The Control of Horses Acts were essential to help reduce the escalation in cases of large numbers of apparently abandoned horses that charities dealt with repeatedly in the aftermath of the financial downturn in 2008.

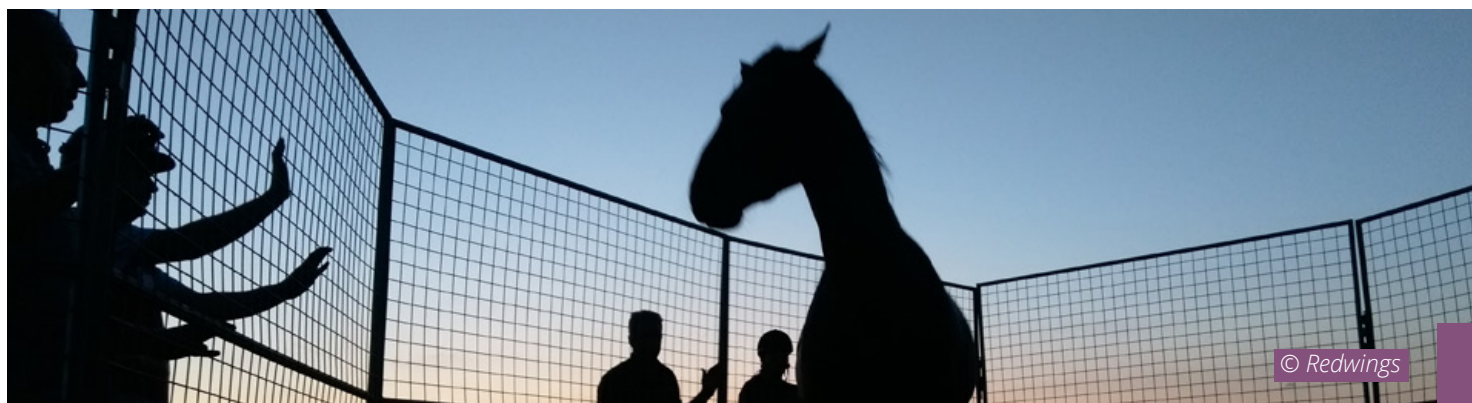
Many landowners used their powers under these new acts and the number of horses visibly fly-grazing decreased in many areas as a result (from around 3,000 in England in 2014 to around 2,000 in 2017). However, the practice still persists in other areas due to private and public landowners' inaction – as they can be unwilling, or unable, to bear the financial costs of removing the horses or fear reprisals from the horse owners. The true number of fly-grazed horses, however, is difficult to estimate given these horses are often moved from site to site and there are concerns that hundreds (some say thousands) of fly-grazed horses have

been moved to less visible locations.

Unfortunately, while the Acts enable more action to be taken to deal with fly-grazing or abandoned horses, they do not provide any ability to hold their owners to account.

In addition to working with the Control of Horses Acts, charities have had to adopt other strategies to enable them to cope with the continuing crisis. This often involves extra financial outlay, only made possible by the generosity of the public:

- Paying for newly rescued horses to be cared for in private boarding until space becomes available in the sanctuary – a last resort due to high costs
- Greater investment in rehoming horses to create more sanctuary capacity, with the challenge of operating in an already crowded marketplace competing with substandard and online dealers
- Routine partnership between multiple charities on welfare cases where large groups of equines require rescue and care
- Increasing strategies to solve welfare problems within the horse's home, including use of non-statutory Improvement Notices and providing financial or practical support to owners
- Investing in increasingly sophisticated approaches to horse owner 'education and engagement' taking on board evidence from human behavioural sciences (See page 4)
- More engagement with local authorities (through regular regional meetings) and government
- Appealing to the public, whose concern and additional support have been critical



More investment in human behaviour change

The last five years has seen an acceleration in the adoption of human behaviour change (HBC) approaches by welfare organisations, designed to complement law enforcement and ensure lasting impact of education and engagement activities. HBC is already being used in many ways, including:

- Incorporating HBC models in intervention design such as the EAST^[1] framework and COM-B^[2].
- Embedding an understanding of human psychology and client communication skills in outreach work, moving from advice giving to motivational interviewing – an evidence-based set of skills to enable behaviour change - and work effectively with resistance and readiness to change.
- Taking a multi-organisational approach to welfare issues with human behaviour at their heart, for example, 'With You Every Step of The Way', incorporating projects led by The British Horse Society, World Horse Welfare and the Blue Cross, uses HBC principles to address the issue of delayed euthanasia, adopting counselling and relational skills to support owners struggling with end of life decisions.
- Focusing on finding sustainable solutions to welfare issues in consultation with the owners of horses at risk and those who influence them, such as coordinated outreach events including microchipping and castration clinics, and interventions at Horse Fairs.
- Looking at issues through the lens of human behavioural science. This approach is applied to the collaborative research currently planned by the RSPCA to better understand the underlying drivers of the Horse Crisis.



© World Horse Welfare

[1] Michie, Susan et al. (2011) "The behaviour change wheel: a new method for characterising and designing behaviour change interventions." *Implementation science* : IS vol. 6 42. 23 Apr. 2011, doi:10.1186/1748-5908-6-42
[2] Behavioural Insights Team (2015) "EAST; four simple ways to apply behavioural insights." The Cabinet Office

How are charities coping?

The demands on welfare charities which seemed so acute in 2012 have continued unabated. The number of horses requiring help from the c.200 equine rescue and rehoming charities in England and Wales continues to outpace the more than 11,350 spaces already provided, and the number of reports from the public regarding poor equine welfare remain persistently high. There are more than 7,000 horses on charities' radar as being at risk of neglect or abandonment – a similar number to those identified since we began collecting data in 2012.

Members of the National Equine Welfare Council (NEWC - which includes most of the largest charities) continue to take in more than 2,000 horses each year, with 2,347 admitted in 2019. Even if only half of the number of horses currently at risk needed immediate help, charities would be unable to cope.

As space at charities is limited, the number of horses that can be admitted often depends upon successful rehoming of existing occupants or placement in private boarding, which inevitably incurs greater costs.

Sadly, not all charities have managed to cope in recent years. Long-standing organisations such as Mountains Animal Sanctuary in Scotland and the Society for the Welfare of Horses and Ponies (SWHP) in South Wales were both effectively only able to continue operations by merging with Redwings, which took place in 2015 and 2018 respectively. The Sussex Horse Rescue Trust folded in 2019, meaning new homes needed to be found for more than 60 resident equines. Other small charities rely on being able to rehome horses with long-term or complex needs to other organisations for them to be able to continue operating.



What is especially challenging for charities now?

A troubling trend over the past decade is growing numbers of cases involving dozens, if not hundreds, of animals. Not only are these cases more challenging to resolve, as they require joint planning and operations with multiple charities and external agencies, but transporting, housing and rehabilitating the sheer number of horses involved stretches the threshold of charitable ability.

In 2020, charities rescued more than 100 horses in a single case at a breeder's premises and another 43 in a case of fly-grazing. The RSPCA and other charities must pay for private boarding for hundreds of horses seized. In 2019, charities worked together to resolve three cases involving more than 300 horses in total, including two commercial dealers and one failed sanctuary – whilst being aware of a number of other sanctuaries also needing rescue and others which could collapse at any time.

Prosecutions under the Animal Welfare Act relating to equines also remain high.

In 2019 the RSPCA secured 182 convictions for horse cruelty, about a fifth of the number secured for dogs despite horses being only a tenth of the population.

In 2019, NEWC member charities including the RSPCA admitted a total of 741 horses which were the subject of prosecutions. These horses are likely to have longer stays of around two years within rescue centres, while the case is resolved in the courts. During this time, charities have to meet all welfare needs but cannot rehome or even castrate these horses, so they effectively 'bed block' other spaces for needy animals and sometimes place extra demands on charity teams (e.g. keeping stallions isolated).



These cases often involve a small number of individual owners. A large proportion of the 7,000 horses identified as being at risk are owned by a handful of unscrupulous breeders and dealers whose primary interests, we believe, are profit and operating without accountability. This can also give them an unfair advantage over responsible breeders. A key ambition must be to prevent these owners benefiting from owning and managing horses while not complying with identification laws or maintaining adequate standards of animal welfare, and breeding indiscriminately to continue flooding the already saturated UK market.

Where responsibility can be proved, legal action will always be considered in an effort to prevent individuals continuing to operate businesses that have contributed so much to the scale of poor equine welfare and subsequent charitable workload across the UK. However, even when an owner's identity is known or strongly

suspected, inability to provide evidence of ownership often prevents action being taken. Currently, endemic issues with Equine ID legislation and enforcement regularly provided such individuals with *de facto* immunity from prosecution.

A related challenge is the establishment of a small, but growing number, of 'vigilante' rescue organisations who, frustrated with the lack of enforcement or perceived inaction on welfare concerns while investigations follow due process, defame welfare charities on social media and seek donations for themselves to seize the horses illegally and impede the investigation, often putting the horses' welfare further at risk (see 'Failure of ownership' below).



Rainbow Meadows

Self-styled 'animal sanctuary' Rainbow Meadows was reported to welfare charities soon after it opened in 2013 due to concerns over the condition of some of the horses in its care.

Over the following two years, welfare officers and a vet from equine charities made repeated efforts to advise and support the father and son who ran Rainbow Meadows. In addition, several statutory improvement notices were issued by Norfolk Trading Standards. However, basic advice on feeding, worming, farriery, veterinary treatment and stocking density were ignored, or only minimal, temporary steps taken to comply with an improvement notice for the follow-up assessment. During this time, the pair continued to appeal publicly for donations.

In November 2015, welfare officers found conditions had deteriorated further, and veterinary assessment concluded that all 20 equines on site were in a state of unnecessary suffering. In accordance with the Animal Welfare Act, the horses were taken into the care of Redwings and World Horse Welfare.

In addition to extremely poor body condition and muscle weakness, other welfare issues among the group included worm burdens, dental problems, overgrown hooves, eye issues, lice and mites. Many of the group were noticeably dull and depressed and several were found to have stranglers. A clear indicator of the lack of care at Rainbow Meadows was the discovery of a plentiful supply of horse feed on site alongside emaciated and extremely hungry horses.

Following a prosecution by Norfolk Trading Standards in 2016, the father was given a lifetime ban on keeping any horse, along with a 15-week suspended prison sentence and costs. His son was banned from keeping horses for 10 years and also ordered to pay costs.





Unlocking the crisis with Equine ID

To effectively resolve the systemic equine welfare problem in England and Wales, we need a reliable ability to link a horse to their current owner. We welcome the new equine identification laws which require mandatory microchipping of horses (in England from October 2020, Wales February 2021 and Scotland March 2021) and the ability for local authorities to issue fixed penalty notices for breaches. The system has real potential to effectively link horses with their owners and also holds benefits for the wider horse world. However, without adequate enforcement, the cost and effort of introducing legislation will be wasted, and the potential for significant benefits for horse welfare simply lost.

For more than a decade it has been mandatory for all equines born after 30th June 2009 to be microchipped and registered, yet only around 45% of horses with chips are believed to be registered on the Central Equine Database (CED). Many more horses are not even microchipped, despite being born after 2009, some of them the most vulnerable. Between 2015 and 2020, for example, only 30% of horses taken into RSPCA care were microchipped.

Equine welfare organisations deal consistently with the outcomes of poorly enforced ID requirements, adding to the time, effort and frustration involved in addressing many welfare cases, when the system should be making case resolution simpler, cheaper and more effective. The examples below illustrate just a fraction of the continuous challenges presented by lack of adherence to Equine ID regulations.

- A 'rescue' centre taking on unwanted colts from a large-scale breeder and dealer without passports but with microchips, then only passported and registered the equines at the point of sale/rehoming to private homes, ensuring there was no link back to either the breeder or rescue centre.
- A yearling abandoned at Appleby Horse

Fair with a range of health conditions in 2019 was found to be microchipped. However, on contacting the registered owner, it transpired he was the breeder and had sold the pony on three months earlier. Details of the buyer enabled a second person to be tracked down, who said he had also sold the pony on, but did not have the details of the buyer.

NB: We have evidence that relying solely on either the vendor or the purchaser results in a substantial number of equines not being correctly identified, thus undermining the traceability of those equines. We therefore believe that, as with some other species, both parties should hold joint responsibility to increase the chances of a Passport Issuing Organisation being notified of a change of ownership.

- A large, well-publicised rescue operation involving more than 100 equines in recent years has been delayed from going to trial partly because of lack of equine ID and registration linking the horses to either of the two co-defendants.
- Two young horses in very poor condition found straying on roads in Norfolk in 2019 were taken into care for their own safety and that of road users. One of the horses was microchipped, but registered to an owner in Essex. Field Officers were confident they knew who was responsible for the pair, but because ownership could not be proved, no action could be taken.
- It is not uncommon for horses to be assessed as part of a rescue operation and found to have two microchips, or even three. Even if these horses were chipped legally, the chips usually have not been registered by the owner with their passport issuing organisation linking the owner to that horse. Although occasional mistakes or migrating chips can lead to double chipping, it is often seen in horses linked to owners known to actively avoid traceability and seek to muddy the waters accordingly.



What is behind this systemic failure in equine welfare?

While the exact causes are neither fully understood nor necessarily all identified, experience suggests several key areas of failure which combined have created a systemic problem: inadequate enforcement, a failure of ownership and lack of effective regulation.

INADEQUATE ENFORCEMENT

Enforcement needs to drive a change in culture towards accountability. Lack of enforcement at almost every stage permits abusers to offend systematically, forcing rescue charities to cope with a perpetual deluge of welfare cases which arise just as - or more quickly than - they can resolve them. Horses can be rescued, but these owners simply breed or buy more, and the cycle continues. Charities are increasingly unable to cope with this demand. Arguably, they should not have to, as they were not given statutory powers* to enforce this legislation; these powers reside with local authorities and the police.

There are two pieces of legislation in particular, which if reasonably implemented and enforced, could go a long way towards fixing this broken system and underpin responsible ownership:

A) EQUINE IDENTIFICATION

Equine ID has never truly been enforced or supported by local authorities, meaning owners are not held accountable for their horses. This is because local authorities were never given any funding to enforce it, and were told to take a 'softly-softly' approach. Compliance with the law is therefore patchy and a significant number of owners neglect to microchip their horses or to update their details to passport issuing organisations (sometimes due to a lack of understanding of what is required or how to do this, sometimes deliberately to avoid being held responsible for the animal). This makes it extremely difficult to link a horse to an owner, and therefore almost impossible to hold an owner to account for a maltreated horse.

New legislation introduced in 2018 and 2019, which incorporates a CED - or in the case of Scotland, the Scottish equine database which feeds into the CED - and allows the use of fixed penalty notices for breaches, has the potential to help rectify this situation. It requires all horse owners in Great Britain to have their horses microchipped and to register their up-to-date data with their passport issuing organisation, for it to be held on the central equine database. This will enable local authorities to check ownership and issue civil sanctions for breaches (however it is important to note that local authorities will not be checking horses randomly as they lack the resources). The retrospective microchipping deadlines differ between England, Scotland and Wales and are dependent on where the passport issuing organisation is based:

1st October 2020 for England
12th February 2021 for Wales
28th March 2021 for Scotland

However, it will only serve its purpose if it is properly and rigorously enforced - but many local authorities in England and Wales have stated that they will not use their powers of enforcement unless they are laying charges for other offences. This is understandable, as they have a wide range of statutory duties (which they must enforce) and depleted resources, so they have to prioritise accordingly - but it is not acceptable if the system is to work. If equines were predominately meat producing animals local authorities would prioritise enforcement to assist the public health regime.

While responsible horse owners are likely to comply with Equine ID regulations, owners of many horses at risk are less likely to feel it is in their interests to comply. If they foresee no consequences for non-compliance there is no incentive for them to buy into a system that makes it harder for them to neglect or abandon their horses with impunity. Simply put, it's the irresponsible owners who will not comply with Equine ID law unless it is proactively enforced.

Recommendations:

- **IMPROVE EASE OF UPDATES TO THE DIGITAL STABLE AND REDUCE THE 30-DAY GRACE PERIOD FOR NOTIFICATION OF OWNERSHIP** The new Central Equine Database should be a critical tool for enforcement so it should be made easier for horse owners to keep their information up-to-date, such as to easily change details online on the Digital Stable itself rather than going through a passport issuing organisation which may not be able or willing to offer an online service. This should be available to all horse owners, including those in Scotland where a different database is currently used, for the system to be truly effective. This is also the most likely way it would become a useful tool with benefits for conscientious owners and equestrian businesses, with the potential to share information on disease outbreaks as well as public information campaigns e.g. Covid and measures yards should be taking.
- **LOCAL AUTHORITIES SHOULD BE ENCOURAGED AND SUPPORTED BY THEIR LEADERS TO CHECK COMPLIANCE** and issue civil sanctions including on-the-spot fines of up to £200 for not adhering to the identification regulations – especially in areas where equines are irresponsibly managed. The equine ID legislation should be reviewed to make this easier for authorities.
- **LOCAL AUTHORITIES SHOULD USE BEST PRACTICE** to improve coordination between the enforcement agencies particularly for multiple-horse cases. Regional groups to facilitate this already exist, but, due to resource constraints, participation by local authorities has reduced. Regional authority inspectors or a representative from the regional animal health meetings should attend.



* What is the difference between a statutory duty and a statutory power?

A **statutory duty** is something a local authority must do. Duties include provision of social care and education. A **statutory power** is something a local authority has the power to carry out if they choose to. Taking action under the Animal Welfare Act and enforcing Equine ID regulations are both statutory powers for local authorities.

B) ANIMAL WELFARE ACT

Due to funding and resource constraints, there has been a decrease over the past 14 years in the number of inspectors of statutory agencies enforcing the Act. Those with the powers to enforce all or part of the legislation (specifically the police and local authorities) have rarely taken up this role unless they have charity support (RSPCA 2016 EFRA submission). They also have limited, if any, facilities in place to hold equines they can seize under the Act. Defra estimate 111 of the 343 local authorities have no animal welfare inspectors at all. This is due in part to the fact that local authorities have never received any funding specifically for enforcing the Act.

As a result, many local authorities will pass on any complaints from the public on animal welfare directly to the RSPCA. This has further increased pressure on charities who are funded by voluntary donations from the public and receive no funding from government for

this enforcement role - so enforcement of animal welfare law has largely relied on the generosity of the public. Charities will always have limited space and resources and cannot take in all of the horses who are deemed suffering under the Act. Local authorities would also likely struggle to afford and maintain the facilities needed to fulfill this enforcement role. Working together, however, local authorities could and should play a stronger role in supporting charities with enforcement and funding should be available to them to assume their role.

Another challenging factor is that certain horse owners may be known to mistreat their animals but action cannot be safely taken without significant police assistance due to public order concerns. This may not be forthcoming due to a lack of political will and resources.

Recommendations:

- **LOCAL AUTHORITIES SHOULD USE THEIR POWERS TO ENFORCE** legislation, and prioritise resources for enforcement of equine identification regulations and the Animal Welfare Act. They should also work with charities to take decisive measures where large-scale and recurring cases of animal neglect are affecting communities, using the The Anti-Social Crime and Policing Act 2014 where appropriate. This should include appointing and training animal welfare officers in horse handling and identification, and working with the police to provide green yards or similar spaces where horses can be kept pending investigation or claims by owners. Equine rescue organisations already provide training and advice on all of these measures for local authorities and are happy to continue this work.
- **LOCAL AUTHORITIES SHOULD BE PROVIDED WITH FUNDING FOR ENFORCEMENT** of the ID legislation and Animal Welfare Act, with consideration given to offering grants for local authorities to address equine-related welfare problems in their communities. Such a fund could be based on the Welsh Companion Animal Welfare Enhancement Scheme¹, where a central fund was made available for specific projects for local authorities to address animal welfare problems of public concern. Central Government should also provide funding for 2 years of proactive enforcement of the ID legislation to give the updated laws the 'earned recognition' required to build faith in the system.
- **LOCAL AUTHORITIES SHOULD ENCOURAGE THE USE OF GRAZING LICENCES ON PUBLIC LAND.** These should include identification and welfare provisions as part of the conditions of the license.

1 Under the Welsh Government administered Companion Animal Welfare Enhancement Scheme (CAWES), which concluded on the 31st of March 2011, funding was made available to Welsh Local Authorities via small grants for special projects to allow the proper investigation of companion animal welfare issues of public concern. Local Authorities could either individually, or in groups, bid for these special project grants. These special projects were delivered by Local Authorities working in partnership with non-statutory animal welfare organisations and other organisations.

FAILURE OF OWNERSHIP

Britain's horse problem is largely caused by sometimes invisible, often unaccountable owners who breed and keep more horses than they can adequately care for. These horses are owned by individuals with various motivations, which can overlap:

- Commercial - While many dealers and breeders ensure their horses' welfare needs are met, there are those who care only for profit. They may prioritise care for horses of quality from which they anticipate profit while disregarding the needs of those of less quality to reduce costs. Their equines who become sick or are born without the quality the owner is seeking may be abandoned to die or be picked up by others. Some may keep and trade in horses as perceived collateral or as a status symbol, while others may use horses to cover for illegal activities. Another concern is that in light of the cancellation of horse markets due to the pandemic these low value equines will increasingly end up sold online (see below).
- Indifference - Some owners relinquish responsibility for their horses or never acknowledge it to begin with. These owners may abandon their horses in vast spaces like moors or commons, or they may have horses that they allow to breed in such areas but take no responsibility for the progeny. In either case, these animals are left to breed uncontrolled on moors and commons across England and Wales, where welfare problems and starvation can impact ever growing herds on land that cannot support them. There is no consequence for this negligence as the horses cannot be traced back to an accountable owner, and many commons and moors do not have systems in place to hold owners accountable. This needs to change.
- "Rescue" - Sanctuaries and rescue centre owners should provide a valuable service in taking in, keeping and rehoming horses, but some of these too can cause significant equine suffering. While most rescue centres are established with a commitment to run a professional establishment, others are started with good intentions but without the capability or motivation to maintain

care of the animals they take in. Once 'rescued' by those who are unable to care for them, these horses can exchange hands frequently or experience neglect. Then there are others who are motivated by frustration at a perceived lack of action and enforcement in situations where equine welfare is believed to be at risk (such as with ongoing welfare investigations). These organisations secure initial financial backing rallied through defaming larger charities and take matters into their own hands by disrupting welfare investigations and seizing animals illegally – then not providing appropriate care for them, so creating more significant welfare problems than those the horses were 'rescued' from. As governance of these organisations can be poor, with many not being regulated as charities, it is not uncommon for these organisations to need to be rescued by other charities who then must try to find space for large numbers of equines (NEWC members took in 186 such equines in 2019 alone). In recent years some notable sanctuaries have been investigated and prosecuted for animal welfare and other offences as with no regulation and a lack of effective governance, the problems spiralled unabated. We are aware that many thousands of horses are being kept at present in such establishments.

- In addition, owners are increasingly buying horses online – or even rescuing them from overseas – and their horses can arrive in poor condition which the new owners struggle to improve. This trend is likely to increase further with markets closed due to the pandemic.

Even responsible owners are likely to struggle during the coming winter if their financial situation deteriorates due to the impact of Covid-19. Winter tends to be the most challenging season for owners as many horses cannot simply be left out at grass, and even for those who can supplementary feeding is required, so horse care becomes more expensive and labour intensive. Higher costs for bedding – and in some regions hay – are already anticipated this winter due to a poor harvest². Costs of feed and veterinary treatment, especially if these increase, place

financial pressure on horse owners who may reduce the amount they invest in their horse's care, seek to sell them or give them away as there is no paying market for them – potentially leading to welfare problems and a greater burden on charities.

The calls to equine welfare charities from private owners requesting that their horses be taken in (which charities cannot take in as they are already at capacity) are primarily motivated by a financial need, a change in circumstances or horses purchased online that are not as advertised – the latter being one of the three top reasons for seeking to rehome a horse online according to Blue Cross research. Examples of why horse owners seek new homes for their horses include elderly horses they can no longer care for, a change in circumstances such as ill-health, divorce or redundancy, horses with health issues that they can no longer afford to treat and horses rescued requiring considerable veterinary treatment and behavioural training. While no horse owner can be insulated from life changes,

Covid-19 will exacerbate these drivers if owners' health and/or finances deteriorate.

Delayed euthanasia is already one of the top four welfare issues facing horses in the UK (Horseman et al, 2016)³. In light of Covid-19 and with financial costs (at more than £500) this is likely to be unaffordable for some and cause owners to delay further, posing welfare problems for ailing horses.

Change in life circumstances that undermine owners' ability to keep horses - and others' inability to take them on - means that the most responsible option for some owners may be to euthanase their horses to prevent their suffering, and there is likely to be more significant demand for this service over winter. However, euthanasia will be unaffordable for some (at more than £500) causing owners to delay the decision, and put the welfare of their horses at risk.

Recommendations:

- **HORSE OWNERS MUST RECOGNISE THIS PROBLEM AND THEIR ROLE IN IT** – they can play an important part in alleviating the horse population problem by breeding fewer horses, rehoming horses and ponies from only registered charities and by avoiding buying from untrustworthy sources, in person or online. Horse owners have a responsibility to comply with equine ID regulations and so ensure their data under the CED is up-to-date by engaging with the Digital Stable. Owners must also understand the need to plan for the end of an equine's life and that making the decision to end a life when the time is right is an integral part of horse ownership and equally important as making the decision not to breed.
- **THE PUBLIC SHOULD ENSURE THEY DONATE ONLY TO REGISTERED CHARITIES** – unless the charity does not meet the income threshold required to register with the Charity Commission. They can check whether a charity is registered by asking for their registration number or checking the Charity Commission website. If the organisation is not a charity, they should ask why not. The public should also make enquiries as to the reputation of the charity and their long term plan for meeting the needs of their horses.
- **ENGAGEMENT WITH HORSE BREEDING AND OWNING COMMUNITIES** by rescue organisations, local authorities and community liaison groups should focus on sharing good practice to stem uncontrolled breeding and poor management and encourage compliance with equine ID regulations. Welfare charities and local authorities have many good case studies on engaging with owners about better horse care and helping foster behaviour change, including discounted passport, microchipping and gelding clinics.

EDUCATIONAL CAMPAIGNS AND METHODS OF SUPPORT should be developed by rescue organisations to have measurable impact; horse, farming and countryside organisations incorporating human behaviour change principles to nudge owners to improve the care of

their horses. For example, the Codes of Practice for the welfare of horses, ponies and donkeys can be promoted in creative ways to horse-owning communities. Whenever tackling a welfare problem, efforts should be taken to test assumptions and thoroughly understand the underlying drivers behind the specific issues. Work needs to be undertaken to assess the audiences, develop the best language to be used in messaging and identify the best medium to convey the messages. For instance, initiatives to change behaviours around horse breeding, including campaigns to raise awareness of the scale of the problem as well as interventions that take account of the motivations behind breeding could help stem the over-production of horses.



2 Defra 2020 costs -Feed/Wheat - £168.77 / tonne vs September 2019 = £128.41; Hay = £69.50 / big bale, vs September 2019 = £51.30;
Wheat Straw = £64.75 / big bale, vs September 2019 = £39.33
3 Horses in our Hands, University of Bristol, 2016

Bodmin Moor

Multi-Agency Rescue and Identification Operation

On Bodmin Moor in 2016, over the course of a five-day operation, over 160 semi-feral ponies were rounded-up for health checks and to be issued with passports and microchips. Overstocking and a lack of enforcement of equine identification laws made it possible for the annual occurrence of life-threatening welfare issues without any recourse or responsibility.

Of those equines rounded-up, 16 unclaimed ponies required urgent veterinary attention. A further 46 equines were transported to safe boarding facilities and another 70 ponies were offered homes by other animal welfare organisations including Redwings, Bolenowe Animal Sanctuary, Mare and Foal Sanctuary, Blue Cross, Bransby Horses and World Horse Welfare.

The project discouraged unscrupulous

individuals who had often seen the Moor as “a dumping ground for unwanted ponies.”

“After ongoing welfare issues the APHA did not receive a single welfare complaint about the ponies on Eastmoor in the Winter of 2016/17 and the 2016 operation is still talked about on Bodmin Moor as a very positive intervention,” reported APHA Veterinary Officer Lorna Stevenson. “The improvement across the other moorland areas continues with the Bodmin Moor Commons Council Pony Keepers Committee working to ensure all ponies continue to be microchipped and passported and to improve quality of stallions and reduce their overall numbers. The APHA confirms that the problems on Eastmoor in Winter 2019-20 were very disappointing but were due to the actions of a small number of people, and do not reflect the rest of the Bodmin Moor graziers”.



LACK OF REGULATION

Welfare charities have noted in the past that the Animal Welfare Act 2006 has never been fully implemented, with secondary legislation not progressed⁴. While licensing by local authorities exists for establishments that hire out horses and for certain other activities involving equines and other animals under The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, there is no regulation specifically for other commercial activities such as equine breeders, dealers, livery yards, or animal welfare establishments such as sanctuaries and rescue organisations. It is perhaps surprising to the public that currently anyone can set up a sanctuary or livery yard without any checks being carried

out or licence required. The public are often unaware that the horse they may be purchasing or rehoming from a self-styled commercial or rescue organisation may not be healthy or fit for its intended purpose. The public may even end up donating to rescue organisations which do not properly care for their animals. Regulation would ensure these establishments are known to authorities, and there is potential to be held to account, thereby encouraging animals' welfare to meet at least minimum standards. Charities are often left to pick up the pieces when these establishments fail, often having to take in large numbers of animals in poor condition at short notice.

Recommendations:

- **LICENSING OF ANIMAL WELFARE ESTABLISHMENTS** - All animal welfare establishments including equine sanctuaries, rescue and rehoming centres should be licensed (there should be no exemptions). This will help to protect the welfare of the vulnerable animals that often end up in sanctuaries and rehoming centres and provide safeguards for those involved in their care. This will also help protect the public by giving them confidence that a sanctuary is deserving of their support.
- **LICENSING OF BREEDERS, DEALERS AND LIVERY YARDS** - We should be working towards a system where all commercial equine activities are licensed and subject to regular checks. We encourage their registration, in line with the EU Animal Health Law 2021 as a first step to accountability for these enterprises, but we should be working on a system of licensing and light-touch inspections in consultation with those expected to implement the system - both from within the industry and local authorities.

⁴ <http://data.parliament.uk/WrittenEvidence/CommitteeEvidence.svc/EvidenceDocument/Environment,%20Food%20and%20Rural%20Affairs%20SubCommittee/Animal%20welfare%20domestic%20pets/written/30664.html>

Why the recession caused by Covid-19 is likely to result in many more equines falling into situations of neglect, abandonment and suffering - and overwhelm charities

Due to Covid-19 and the prospect of serious economic recession and continued social disruptions, it is inevitable that the ability of charities to continue to provide a safety net for those horses most in need will be significantly undermined. With a 'just about managing' status prevailing across equine charities for almost a decade, the prospect of reduced income and increased need for welfare interventions present a critical risk in our ability to prevent a horse welfare catastrophe.

All charities are already negotiating a changed and challenging environment and planning for further unprecedented compromise in 2021. In a survey of 74 of the largest equine welfare organisations conducted by NEWC in May 2020, the clear message was that Covid-19 has negatively impacted on all respondents⁵. At the time of the survey:

- Over 81% of respondents had closed their premises to the public and all who have shops had closed them (43%), a key source of income for many of these organisations.
- 66% of those who responded had stopped or reduced rehoming, while only 38% of all

rescues had stopped taking in animals.

- Only 16% of respondents had not taken action to mitigate impact of Covid-19 on their organisation.
- 41% had furloughed staff with 8% having taken the decision to make staff redundant.
- 26% had applied for grants.
- Many equine rescue centres rely heavily on volunteers to care for their animals, yet over 70% reported they had reduced the number of volunteers by over 50%.
- Access to veterinary care appears to be a key concern with 51% reporting they had reduced access to non-essential veterinary interventions and, more worryingly, 32% said they had reduced access to essential veterinary care.
- Over 83% of rescues reported that restrictions have had a negative impact on fundraising, with 53% reporting a reduction in income of over 50%.

⁵ <https://www.worldhorsewelfare.org/news/survey-shows-dramatic-effect-of-covid-19-on-equine-rescue-organisations>

What are the challenges for charities over next 12 months?

Charities are facing a situation where they will be expected to cope with a surge in welfare cases over winter while already struggling to cope – and needing to operate in an environment that will put their operations under even more pressure, with challenges including:

- Reduced charitable income due to a fall in public donations and cancellation of fundraising events.
- Increased numbers of equines in need of help and at risk due to recession. Research in the immediate aftermath of the lockdown restrictions being implemented showed that one-third of owners were worried that the impact on their finances could affect the welfare of their horse.
- The likely significant numbers of animals who did not receive appropriate care during the lockdown due to the financial, emotional or physical stressors of the pandemic experienced by their carer.
- Increased unemployment or health concerns which may cause owners to relinquish their horses or prevent them from rehoming additional horses⁶.
- More horses being returned to charities from existing loan homes for economic reasons.
- Increased feed, forage and bedding costs due to a poor harvest in 2020⁷.
- More pressure on already stretched staff due to redundancies, recruitment restrictions and altered working patterns.
- Delays to court proceedings which will mean that horses are prevented from undergoing important procedures such as castration and more work involved in their care, and the horses must be housed for longer periods while the cases make their way through court – increasing costs and limiting rescue centre capacity.
- Increased incidence of struggling

sanctuaries resulting in horses needing to come into the care of other organisations working at capacity. This could be either to enable a struggling sanctuary to survive, or following the collapse of a rescue centre.

- An oversupply of horses that will reduce their value in what was already a flooded market, especially at the lower end. Breeding has continued throughout the lockdown, despite the uncertainty of the market for foals while only a limited number of horse sales are taking place and markets have been cancelled. We know the number of sales has greatly reduced anyway, such as the closure of Brightwells horse sales earlier this year, and we are concerned that some may now not resume, in which case breeders and owners will have reduced options for selling their stock going forward. While some of these markets are now virtual and we are seeing an increase in horses being sold on online platforms. While mid-market prices have spiked, we are seeing high-end prices falling due to supply outstripping demand. Monitoring the volatile equine market will be essential in the coming months.
- Evidence that breeders and commoners who use common land and mountains to keep their equines have not taken their animals off the land to sell on this year and will leave these areas overstocked, which will add further to problems with overbreeding, damaged grazing, and potential future welfare concerns.

A depressed and flooded market will inevitably lead to an increase in unwanted horses and welfare issues. Through the rest of 2020 and into 2021 owners will have significantly limited options to sell or loan their horses, if they are unable to continue to care for them themselves. With limited capacity in the rescue and rehoming system, charities anticipate demand for their services will far outstrip capacity.

6 <https://www.hartpury.ac.uk/news/2020/04/recommendations-for-equin-e-industry-over-impact-of-covid-19-pandemic/>

7 Defra 2020 costs –Feed/Wheat - £168.77 / tonne vs September 2019 = £128.41; Hay = £69.50 / big bale, vs September 2019 = £51.30; Wheat Straw = £64.75 / big bale, vs September 2019 = £39.33

Conclusion

Everyone is responsible for fixing the broken system behind poor equine welfare in Britain, including horse owners, breeders, dealers, government, landowners, local authorities, equine vets and rescue organisations. Be clear that welfare charities have little capacity in their ability to react to the present and potentially escalating problems. Whilst charities work together on rescues, evidence-based interventions and rehoming, they will

not be able to cope if even a minor proportion of the thousands of equines presently at risk need help. Therefore all parties need to work together on these solutions to prevent a potential equine welfare catastrophe in the next 24 months and create a better system where equine welfare is better protected. The recommendations above provide a pathway to help achieve this.







On arrival



After rehabilitation