

Patron Her Majesty The Queen

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Fulfilling your passion
for horses

The British Horse Society's response to SG consultation on Food Standards

The British Horse Society is the UK's largest Equine charity. We represent the interests of the 4.3 million people in the UK who ride or who drive horse-drawn vehicles. With over 75,000 core BHS members, a further 34,000 members of affiliated Riding Clubs and the members of Affiliated Bridleways Associations, we have a powerful voice with Government.

As the foremost and most influential equestrian charity in the UK we can bring to the fore the full scope of our charitable objectives in education, welfare, access and safety.

We work tirelessly for every horse, rider and carriage driver, focusing on horse welfare, horse and rider safety, access and rights of way, education and examinations, and working with the proprietors of riding schools, livery yards and trekking centres to maintain the highest standards. We also work in partnership with many other organisations, not least the British Equestrian Federation, to promote the interests of all those who participate in equestrian activities.

BHS Scotland has a separate constitution and is affiliated to horsescotland, our sporting arm – directly BHS Scotland represents over 10,000 Scottish horse riders when our membership and the membership of our affiliated British Riding Clubs is taken into account. The British Horse Society is a passport issuing organisation (PIO).

The British Horse Society will restrict its comments to the horse meat trade.

The recent horse meat furore, much of which involved criminal activity has thrown into the limelight that a proportion of equines are a food animal. For the last 15 years BHS Scotland has been aware of a bonafide Scottish horse meat trade which at its height saw approximately 1000 Scottish horses a year making the journey to licensed equine abattoirs in Cheshire and further south. The main specialist equine services (meat men) operating in Scotland have been Potters (the Red Lion Abattoir that was recently closed down) and Turners, both from Cheshire.

The price of horse meat fluctuates between 40p and £1 per kilo deadweight.

Scottish horse meat – like all Scottish livestock – demands a certain cache on the continent carrying 'terroir' – meaning that Scottish horse meat has been known to command a premium price on the continent because of the quality of our grass, water and air.

This bonafide (as in a licensed abattoir where horses are slaughtered under veterinary supervision) trade is extremely important to equine welfare - taking hundreds of Scottish horses away from the prospect of a downward spiral of neglect and abuse each year. A welfare organisation like ours defends a supervised and high welfare equine meat trade for this reason.

It is also worth commenting how expensive it is to euthanase a horse and dispose of its carcase for a horse owner. As long as the horse is sound and fit to travel, the meat trade can garner a small price instead of the owner having to spend on average £200 for your horse's disposal.

However, it is disappointing that our horses have to travel live to be killed and it would be preferable if Scotland had the sort of specialist abattoir that equine welfare requires. It would also be better if the horse meat trade was transparent, so we could be sure that those taking the long journey to equine abattoirs were sound to travel, had the correct documentation and were suitable.

The horse is in the fortunate (because there are advantages for the industry which in some views outweigh the disadvantages) position of enjoying a mixed status; meaning it is sometimes a food animal, sometimes a sporting animal, sometimes an agricultural animal and sometimes a pet. This is complicated but it means that horses can travel around the UK freely. This mixed status has contributed to the situation where the meat industry is hidden and also the awful prospect of previously sporting animals that have been given therapeutic drugs entering the meat trade.

It is also a concern that the unwanted equines that enter the food chain are often elderly or unsound and as such are the most likely cohort to have received veterinary medicine in their lifetime. **Perhaps we ought to review the status of equines?**

From a food point of view the important challenges surrounding horse meat include the need for proper traceability, a recording of origin, the reassurance that no MRLs (minimum residue level drugs that could poison humans) can reach the human food chain and a certainty that the horse that is being killed is the horse everyone thinks it is. Our substandard equine passport system with a plethora of PIOs and vets and enforcement staff unsure of their responsibilities has not been able to provide these reassurances.

It is important to note that if the current passport legislation was properly enforced and if every horse owner was educated and aware of their responsibilities then a lot of the current concerns could be tackled. **Educate on and enforce the existing equine passport regulations**

You must be aware that because of the horse meat furore recently proposed Europe legislation has moved the equine passport system forward by decreeing that there should be one passport issuing organisation, one data base and one competent authority per member state. Basically the industry needs a single robust equine passport system coupled with micro chipping and proper enforcement to ensure the reassurances that the food standards agency requires.

Currently equine organisations like ours are working the Animal Health and Welfare Division of the Scottish Government through a long process and waiting to see how the European 5 Point Plan for equine traceability pans out. **Work to implement a new more robust equine passport system must continue.**

The British Horse Society feels strongly that the proposed new food body has a responsibility to ensure that the micro chipping, traceability, one PIO and enforcement required to make horse meat safe is in place as soon as possible.

In addition attention needs to be paid to the clear labelling of food – so that origins and traceability is included.

Besides food there are so many advantages to a robust and accountable passport system for horses – biosecurity, disease surveillance, better breeding and altogether better protection for Scottish equines is all there in the mix.

The British Horse Society is certain that the new Scottish food standards agency has a role to play in ensuring that Scottish horses, and by default the human food chain, are given the protection they require.

Question 8 – The new food body must ensure implementation and enforcement of the equine passport regulations both current and evolving.

Question 9 – The BHS in Scotland agrees with proposals to retain criminal offences for non-compliance with food labelling law.

A robust regulatory enforcement strategy would include proper implementation and enforcement of current equine passport regulations. This will include education of all horse owners. The BHS supports moves towards the creation of one equine database per EU member state as per recent European policy suggestions.

Question 10 – The new food body's powers should be extended to include enforcement of equine regulations.

Thank you for accepting our submission and please do not hesitate to get in touch should you require any further information.

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