

The Natural Horse Group Response to the Draft Animal Welfare Bill

The Natural Horse Group welcomes the chance to respond to the Draft Animal Welfare Bill and supports the aims of the bill. We would like to comment on the specific parts below.

Annex F: Proposal to Licence Livery Yards

The Natural Horse Group is not convinced that compulsory licensing of livery yards is necessary. Our reservations about the scheme are:

1. The legislation in the new Animal Health Bill will give powers to the authorities to prevent cruelty. Licensing is actually made less necessary by the introduction of the Animal Health Bill.
2. Livery yards are patronised by individual horse owners, whose level of knowledge should be such that they make a judgement about the conditions at a livery yard. Unlike, boarding kennels and catteries, where the animal is left in the care of the establishment, owners visit livery yards regularly, and so are in a position to see how the yard is run. Livery yards that do not provide good care, will not succeed.
3. The cost of licensing is high for small livery yards that may keep a few horses. There is no guarantee that the cost of licensing will not increase in the future.
4. Focusing on farm diversification as being one of the reasons that licensing and inspection are necessary does not take account of the fact that a farm livery is a more ethologically sound environment for horses than traditional stables. A farm livery has the potential to allow horses to be kept more extensively, using yards and barns, thereby allowing more behavioural freedom.

Shortcomings of current licensing requirements

If licensing is to go ahead, we should not be licensing bad horse-keeping practices. Current knowledge tells us that horses are extensive living animals, yet current horse keeping is often intensive. In this respect, the existing British Horse Society licensing scheme falls well below the standards that horses should be kept to and, therefore, will do nothing to improve the welfare of horses.

Clause 11(subsection 4) of this draft bill states that welfare needs consist of:

- a) the need for a suitable environment in which to live
- b) the need for adequate food and water at appropriate intervals
- c) the need to be able to exhibit normal behavioural patterns
- d) any need to be housed with, or apart from, others of its own or other species
- e) the need for appropriate protection from, and diagnosis and treatment of pain, injury and disease.

The existing British Horse Society guidelines permit:

- a) horses to be kept in stalls or looseboxes with only one hour's turnout and no turnout on some days. It also permits horses to be kept outside without adequate access to shelter. This is a particular problem in summer when horses need to be able to escape the heat and insects. It is rare for horses to be kept in stalls today, however, it should not be presumed that a loosebox is an acceptable alternative; one study, funded by

the RSPCA, showed that circus horses kept in looseboxes showed more behavioural abnormalities than those kept in stalls, because the former group had less social interaction with other horses.¹ Humane horse-keeping would favour barns and yards as suitable accommodation for horses, so that they can be kept in social groups with constant movement. Many looseboxes are actually cages under another name

- b) horses to be kept without constant access to appropriate forage. Naturally living horses spend about sixteen hours a day foraging. Their digestive systems are designed to have a constant supply of low energy, high fibre feed. Horse's stomachs are not designed to digest large quantities of starch and sugar². When fed concentrated feed in meals, digestive problems result because ulceration results, often leading to crib-biting.
- c) horses to be kept in stalls or looseboxes, in close confinement. This limits the natural behaviour of movement, socialising, and foraging for food
- d) horses are social animals. They spend their whole lives with other horses. Horses that are kept in loose boxes, stalls or individual turnout paddocks cannot fulfil their social needs in terms of physical contact with other horses for the purposes play, mutual grooming or simple companionship

Horses that are restricted in behaviour and appropriate diet, as outlined above, are usually under mental strain and therefore, cannot be said to be free of pain, injury or disease. Current good practice in terms of animal keeping in zoos, circuses, farming and laboratories focuses on the requirement for animals 'to live in environments that foster the expression of species-typical behaviors [sic]³ Animals that cannot express species-typical behaviours often exhibit abnormal and maladaptive behaviour. Animal Welfare Institute guidelines state that: '[t]he essentials of adequate housing for horses in research institutions are: Access to hay and water ad libitum, a soft substrate for lying, visual contact with other horses and opportunity to exercise at will with other horses.'⁴ If horses in laboratories and circuses are acknowledged as needing certain living conditions, surely the same must be done for domestic horses being kept for pleasure, breeding and sport. There are many adaptations that can be made, easily and cheaply, to provide environmental enrichment to horses living in existing systems.

Species typical behaviours of horses

Horses are free-ranging, social, herbivores. They are adapted, both mentally and physically, to this lifestyle. This is irrespective of selective breeding that has occurred under domestication. The physical and mental well-being of horses are inseparable.

The species-typical behaviour that is seen in horses consists of:

- Constant movement - in feral herds this is around 20 miles per day, while youngsters spend time in play and exploration.

¹ Kiley-Worthington, D., *Animals in Circuses and Zoos*, Little Eco-Farms Publishing, 1990

² Cuddeford, D., *Equine Nutrition: some unique features, functions and frailties of the digestive system of the horse*

³ Stewart, K. L. and Bayne, K., 'Environmental enrichment for laboratory animals' in *Laboratory Animal Medicine and Management*, Reuter J.D. and Suckow M.A. (Eds.) International Veterinary Information Service, 2004

⁴ Houpt, K. A., and Ogilvie-Graham, T. S., 'Comfortable Quarters for Horses in Research Institutions', *Animal Welfare Institute*, 2002

- Social life. Horse groups are usually family groups, with bachelor groups existing on the periphery. Horses rarely choose to be out of visual and physical contact with other horses. The Secretary of State's Standards on Modern Zoo Practice states that:

Animals of social species should normally be maintained in compatible social groups. They should only be kept isolated for the benefit of the conservation and welfare needs of the group, and where this is not detrimental to the individual specimen.

We believe that it would be inconsistent for the government to divest responsibility for licensing horse-keeping establishment to an organization that promotes a standard of animal care that does not match up to the government's own standards⁵ for animals in another captive situation.

- High forage diet. horses are adapted to eat large quantities of forage. They are not well-adapted to cope with high starch or sugar. They are vegans so do not have digestive systems designed to process milk, cod-liver oil and other animal derived substances often used to supplement horse feed. Horses spend the majority of their time searching for food and eating it. Feeding meals is damaging to horses physical and mental well-being.

Abnormal and maladaptive behaviours

It is common to see stereotypical behaviour in stabled horses⁶. Such behaviours include weaving, crib-biting, wind-sucking, box-walking, head-bobbing, repetitive movements of the mouth. Other abnormal behaviours would include aggression, depression and nervous activity.

In horses, such behaviours are still being attributed to boredom and are still addressed by punishment and aversion by making the behaviours painful or difficult, using mechanical, electrical and surgical means. There is also a move towards chemical control of abnormal and maladaptive behaviours, for example, by adding antacids to feeds or using tranquilizers.

Ethologist, Dr Marthe Kiley-Worthington produced a study looking at behavioural restriction of horses under different husbandry conditions, presuming more than one horse was being kept. Her restriction quotient, increasing with increasing restriction is summarised below⁷.

Wild/feral	Extensive Pasture	Enclosures	Small enclosures/ Yards	Loose boxes	Stalls
0	0	8	8	15	17

The Natural Horse Group believes that, if yards are to be licensed, in addition to being protected from pain, injury and disease the yards need to fulfil four criteria for good welfare:

First, space to move. Second, constant companionship. Third, an appropriate diet in the form of a forage-based diet and finally, the opportunity to exercise a wide range of natural behaviour.

⁵ Department of the Environment, Transport and the Regions, *Secretary of State's Standards of Modern Zoo Practice*, March 2000, Her Majesty's Stationery Office

⁶ McGreevy, P. D. et al, 'The prevalence of abnormal behaviours in dressage, eventing and endurance horses in relation to stabling' in *The Veterinary Record*, July 8 1995

⁷ Kiley-Worthington, D., *Animals in Circuses and Zoos*, Little Eco-Farms Publishing, 1990

Yards should be inspected for horses showing signs of behavioural distress manifested as abnormal and maladaptive behaviour. Yards that combat such behaviour by mechanical or electrical means, for example, crib-biting collars and weaving bars, are not exhibiting good horse-keeping practices. Yards that combat stereotyped behaviours by providing environmental enrichment would be following good equine keeping practises.

Annex E Proposal to Licence/Register Animal Sanctuaries

Our comments about Annex F also apply to Annex E as regards the standards to which horses should be kept. However, we agree that some form of inspection is necessary for sanctuaries, because the horses are not under the care of individual owners as is the case for livery yards. We would support the cost of inspection being kept to a minimum, so that funds are not diverted from the care of horses.

Tethering

The Natural Horse Group welcomes guidelines on tethering. Tethering can be more humane than isolation in a loosebox, allowing grazing, movement and visual contact with other horses. It also has benefits in that the horse is constantly moved to fresh grazing, thereby reducing the risk of it grazing worm contaminated pasture. However, good tethering depends on where and how the horse is tethered and the same reservations about keeping horses restricted in looseboxes apply to tethering. Both methods of restricting horses arise from a time when horses were worked hard and so were ready to rest once restricted. Tethered horses still need to be given the opportunity to move and socialize without restriction for a proportion of their time, every day. A particular concern is that of access to shelter in hot weather.

We have evidence that welfare organisations may be focusing attention on tethered horses, with false beliefs about what is natural for them. For example, offering water to a horse twice a day is adequate, if it is difficult to provide constant water. Horses do not actually need constant access to water; in feral conditions they may drink once a day or less.

Concerns about tethered horses belonging to Travelling people could be addressed by the provision of fields for horses in the vicinity of Traveller sites.

Tail docking in dogs

Although the Natural Horse Group is concerned with equines, we do believe that it is time to enforce the law about docking dogs' tails for cosmetic reasons. It is virtually impossible to buy a pedigree puppy of certain breeds that has not been docked at birth. Docking is mutilation, involving the severing of the spinal column.