

# Consultation on the implementation of revised EU rules on equine identification in Wales

Responses should be returned by **30 May** to:

Equine Policy Team  
Agriculture – Sustainability and Development Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

e-mail: [EquineIDceffylau@gov.wales](mailto:EquineIDceffylau@gov.wales)

1: Do you agree that an equine should be identified within six months of birth, or by 31 December in the year of birth, whichever is later?

YES ..... NO .....

2: Please provide reasons for your view, and any evidence which informed this. If you consider that the deadline for identification should be no later than 12 months following birth, please provide the reasons for this view.

3: What do you consider to be a reasonable time limit for submitting an application for an identification document?

4: Do you consider one calendar month before the deadline for identification of the equine to be sufficient?

YES ..... NO .....

5: Please provide your comments and views on requiring Passport Issuing Organisations to update the Central Equine Database with new and amended information no later than 15 days from the date of recording the information.

6: What benefits do you consider would be gained from requiring PIOs to update the CED more quickly than the 15 day deadline? In responding please set out what practical/administrative burdens this might place on PIOs.

7: Should the Welsh Government extend the micro-chipping requirement to all horses in Wales, regardless of their age?

YES ..... NO .....

8: Please give your reasons and provide any evidence for why you are in favour / not in favour of question 7.

9: Do you agree that those organisations currently covered by the derogation for semi feral ponies fall outside the scope of the derogation ?

YES ..... NO ...No.....

10: Please give your reasons to your response in Q9. Do you think there are any equines within Wales which meet the definitions stipulated in the European Regulation. Please can you provide evidence to support your view.

NRW believes WG should demonstrate its focus on the needs of Wales by continuing to allow a derogation for Cymdeithas Merlod y Carneddau in North Wales and the Section A Welsh Mountain Carneddau Ponies in the defined area, under Regulation 2015/262 (recital 32). This is because:

- a. These ponies live under semi-wild conditions and are separated from equidae in any form of domestic use. Although they are nominally “owned” by members of the Cymdeithas Merlod y Carneddau they remain effectively outside of human control for their survival and reproduction.
- b. Gathering the ponies off the hills specifically for passporting and micro-chipping would create additional, undue stress to these ponies and may impact on their wellbeing. The practical implications of this proposed requirement need to be understood. Llanllechid, Aber and Llanfairfechan commons run together without boundaries from Bethesda to Conwy and from near sea level to nearly 100m altitude. At the present time, the Carneddau ponies are only gathered occasionally in the autumn to remove excess stock or to address immediate welfare issues before the winter. There are about 200 breeding stock maintained on the mountain and perhaps 100 – 150 foals produced each year. Gathering the ponies involves 5 or 6 separate gathers over this expanse of rough terrain, each gather requiring about 25 personnel, some on quadbikes, some on foot. On each occasion, ponies which have been gathered and released on earlier days may be caught up in subsequent gathers as they stray between hefts during this disturbance. Given the practical difficulties of gathering on such terrain, it cannot be guaranteed that all animals could actually be caught and marked. When caught, the animals (which are not otherwise handled) experience significant stress which may impact on their wellbeing. Mares in foal are then at risk of miscarriage. Micro-chipping 350 animals would be an additional stress and a major undertaking, with veterinary cost estimated to be circa £10k and would require corralling of large numbers of animals awaiting injection.
- c. There is no money to be made from the Carneddau ponies; costs far exceed returns and the herd is maintained as a local cultural tradition rather than an enterprise. The logistical difficulties and added costs of gathering the ponies for micro-chipping will reduce the financial viability of the herds, as the cost of passporting each animal will be similar to their market value (or in the case of colts, in excess of their value after gelding is accounted for). Owners may not wish to accept the additional costs or the risk (and penalties) of failing to capture and mark all the animals and are likely to reduce/sell their herds and this will impact on the viability of Carneddau ponies’ genetically distinct population. Though they have shared ancestry with the Welsh Section A pony, Carneddau ponies exhibit distinct genetic signatures demonstrating that the population has been isolated for at least several hundred years. Research at IBERS, Aberystwyth University demonstrated that these ponies are a genetically, unique breed that need to be protected. <http://www.bbc.co.uk/news/uk-wales-north-west-wales-22304043>
- d. Carneddau ponies play a vital role in the mountain ecology of the Snowdonia National Park. They have grazed in the harsh mountain conditions for centuries and are well adapted to the environment. Their grazing plays an important role in maintaining the vegetation in the Eryri SSSI / Special Area of Conservation; as noted in the Core Management Plan for the SAC <https://www.naturalresources.wales/media/671995/Eryri%20SAC%20plan%20English.pdf> “Cattle and ponies are considered beneficial at appropriate stocking levels because they graze the coarser vegetation which sheep avoid and produce a more varied vegetation structure”. Their dung is also important in providing invertebrate prey for chough on this site. Cattle are now rare on the hills and graziers cannot be persuaded to risk such high value livestock on the unenclosed commons, so the feral ponies are

the only animal able to provide this function. Loss of the Carneddau pony herds are likely to have a detrimental effect on the habitat condition in this area.

- e. Carneddau ponies are also an important component of the culture and heritage of the area. Farmers on the lower slopes of the Carneddau have kept Welsh Mountain Ponies for generations. Loss of this tradition would be detrimental to the culture and tourist economy of the area as the ponies are a significant attraction of these hills. A HLF funded landscape partnership project “Rhannu'r Hen Fynydd: Carneddau Landscape Partnership” is currently being developed by the Snowdonia National Park which highlights the heritage of the Carneddau ponies and their historical associations with the land and its people. <https://www.snowdonia-society.org.uk/carneddau-landscape-partnership/>

11: Do you agree the Welsh Government should regulate to require owners to re microchip a horse where the microchip has failed?

YES ..... NO .....

12: Please give your reasons and provide any evidence for why you are in favour / not in favour of this option (question 10).

13: Do you agree that the keeper should be legally responsible for notifying the Passport Issuing Organisation when a horse has been signed out of the human food chain?

YES ..... NO .....

14: Please give your reasons and provide any evidence for why you are in favour / not in favour of this option (question 13).

15: Are there any other issues that the Welsh Government needs to address in order to improve compliance? Please provide as much detail as possible:

16: Do you think that steps could be taken to improve compliance with the equine identification regime? If so, please could you specify what you believe could be done.

17: Please provide any other comments you have, particularly in terms of how the requirements of the regulations could be communicated to ensure a strong level of compliance.

18: Do you think compliance with the equine identification regime could be improved through the use of civil sanctions and/or administrative sanctions? Please provide reasons for your response.

YES ..... NO .....

19: Do you agree, if introduced, any regime of civil sanctions should continue to be underpinned by criminal sanctions and / or the civil court system for more serious offences? Please provide reasons for your response.

YES ..... NO .....

20: Please provide an estimate of the current costs you incur in complying with the identification requirements (Please include brief details and a breakdown of costs).

21: Please provide any additional views or comments you have on the equine identification regime that you have not provided by way of a response to earlier questions within this consultation.

**Consultation  
Response Form**

Your name:  
Organisation (if applicable):  
Email  
Telephone number:  
Your address:

**Confidentiality**

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here: