



**European and Mediterranean
Horseracing Federation**



European Federation of Thoroughbred
Breeders Associations

Commissioner Stella Kyriakides
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cc :
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Dear Commissioner Kyriakides,

The thoroughbred breeding sector is the international leader for the export of high-quality racehorses and breeding stock world-wide. Thoroughbreds make over 20,000 trips annually between the three principal European racing nations (France, Ireland and Great Britain) alone. Thoroughbreds travel regularly and often on long international journeys, both within the EU and to third countries. Unlike farm livestock a large proportion of these journeys are return journeys.

Movement of breeding horses is essential to the Thoroughbred industry, and not just for the purposes of racing in competitions - Thoroughbreds must be bred by natural means, as artificial insemination is banned by international agreement.

Whilst we welcome the exclusion of horses *for the purposes of participating in training, exhibitions, competitions, cultural events, circuses, and equestrian sport and leisure activities* from the scope of most of the proposed Regulation, the exclusion of thoroughbreds for breeding, and to and from sales (moved in exactly the same welfare conditions), will have absolutely disastrous consequences for our sector. Indeed, many of these proposals, if implemented, would lead to demonstrable, negative welfare consequences for our breeding horses.

All the 1/2005 Regulation derogations currently available to High Health thoroughbred breeding stock - carefully negotiated and agreed, to take into account our sector's high standards of transport - will be removed and replaced with unsuitable proposals focussed on slaughter and farm animals.

This makes no sense, either from a practical, welfare or economic perspective as our sector works on an entirely different model from the farm animal and slaughter sectors.

The former derogations in 1/2005 link to the provisions of Regulation (EU) 2016/429 and are also used in other relevant legislation, such as that used in animal health certification. In these texts, high health breeding Equidae are clearly included in derogations because they can easily prove they are transported with high health and welfare standards. Therefore, while we would have preferred that the new proposals mirror the 429 regulation categories, we see no justification for new restrictions on transporting high health Equidae. The required certification both for animal health and welfare purposes may also cause ambiguity and confusion, if the terminology is not aligned.

There is also already a specific exemption within this proposed Regulation for animals for scientific purposes, *'(17) due to the strict requirements on the quality of animals needed for research'* and because the, *'Transport of live animals for scientific purposes is undertaken by specialist operators with specially designed vehicles equipped to ensure the health and welfare of the animals throughout the planned journeys.'* Transport of high health breeding thoroughbreds mirror these high standards and therefore there is no reason why our sector should not, therefore, also be able to adopt species-specific, individual requirements to safeguard the welfare of our horses, rather than applying this general, ill-fitting slaughter/farm general model.

Given the high standard of provable veterinary care, and quality of transport given to Thoroughbreds for breeding, and youngstock, and their high-health status in relation to other horse populations, there is no welfare-based reason not to include High health breeding horses in the equestrian exemption or at the very least to continue to apply similar derogations to replace those which were agreed under the current 1/2005 Regulation.

The recent agreement between Ireland and France in relation to derogations from health certification for High Health thoroughbreds under Article 69 of Regulation 2020/688 on intra community movements also establishes a workable, and very valid, precedent for such derogations for High Health equine breeding stock within any new transport regulation.

While we know this issue is now to be taken up by the European Parliament and the Council, the Commission will inevitably be called upon for advice and guidance, and therefore we urge you to consider our position on this issue, and accept the validity of the inclusion of a derogation for High Health equine breeding stock in Article 2, or, at the very least, specific derogations for High Health equine breeding stock from journey time, resting periods, temperature, veterinary supervision at loading and other issues which we detail in the attached annex.

Yours sincerely,

(e-signed)

Dr Paull Khan

Secretary-General

European & Mediterranean Horseracing Federation

(e-signed)

Mr Joe Hernon

Chairman

European Federation of
Thoroughbred Breeders Associations

ANNEX

Some specific issues within the proposed Transport Regulation provisions which will negatively impact on the transport of Thoroughbred breeding stock.

- 1. Limit, on unloading for rest, to only once at an authorised control post on long journeys, and a maximum of two parts.**

Scientific study has shown significant stress differences between horses which are accustomed to transport and those who are not (mostly to slaughter) which has been backed up by EFSA. Therefore, the scientific reasoning for **limiting unloading for rest to once only during a journey** is counter to the welfare needs of thoroughbred horses, and does not conform to the current established model of travelling these horses throughout Europe, both for their welfare and for bio-security. For example, Thoroughbred breeding stock travelling between Ireland and the South of France or Italy would typically have at least 2 or more unloaded rest periods which are tailored to the individual rest requirements of those horses.

Limiting this rest to an authorised control post further limits our choice of stop-over and brings into play significant bio-security issues. Currently, such authorised posts on strategic travel routes do not even exist.

There is no valid welfare basis for this proposal. This would negatively impact on our horses' welfare.

- 2. Animals to be transported have to be accommodated at the place of departure for at least 1 week prior to departure, or to remain in place of destination in third countries for 7 days after arrival.**

This requirement, based on a farming model also, does not correspond to how our sector operates. Thoroughbred horses travel regularly and are accustomed to transport. European bloodstock sales auctions are a world leader, attracting buyers from around the globe. Requiring the hundreds of thoroughbreds who travel to an auction to stay there for a week before or after sale would be impossible as the required staff and facilities do not exist for exercise or grazing.

There is also a large number of “walk-in” mares in the breeding sector, where there is no welfare benefit or other reason in staying this length of time at a visiting stallion stud.

In the case of equine animals there is no residence period prior to intra-Union movements, so this new proposal (as in the case of the new classification of types of derogated Equidae) would require substantial changes to other legislative texts and would require a restructuring of the entire European industry model of thoroughbred breeding.

Due to its geography, and for historical and cultural reasons, the UK, now a third country, is a major destination, and an international hub for the sale of young thoroughbreds from Europe. For example, 2022 figures show that 52% of Irish thoroughbred horses sold at auction were sold in the UK, to a value of 279 million euros.

There is no valid welfare basis for this proposal. This would negatively impact on our horses' welfare.

3. Presence of an official veterinarian at loading

We fully understand that this proposal has arisen because of the number of slaughter animals which are already injured or are unfit for transport before loading.

But here there is a significant difference between, on the one hand, transport of animals to slaughter or farm animals and, on the other, transport of Thoroughbreds to breeding or a bloodstock auction, or private sale. It would simply not make economic sense to spend the money travelling a sick or injured horse. There is regular veterinary supervision already on Thoroughbred studs and at auctions. Unlike livestock, many of these horses travel as individuals – meaning only one horse transported at a time, meaning an official veterinarian would have to make a visit just to see a single horse loaded by expertly trained staff who have no economic, or welfare reason not to load the horse in optimal conditions. Delays would inevitably arise because of waiting for veterinarian attendance.

There is no valid welfare basis for this proposal. This would negatively impact on our horses' welfare.

Mares and foals

Banning transport for Thoroughbred mares and foals also does not make sense for our model. Foals are allowed only one rest period and max 18h journey and mares cannot travel after the first 80% of gestation or having given birth in last 7 days. However, mares and foals frequently travel to improve their health and welfare in specific circumstances.

There is no valid welfare basis for this proposal. This would negatively impact on our horses' welfare.

Temperature

Within 25 to 30 degrees only short journeys during daytime and at over 30 degrees only transport at night would lengthen journey times unreasonably and risk significant problems with bio-security.

There is no valid welfare basis for this proposal. This would negatively impact on our horses' welfare.