

# Passport to a healthier life

The seemingly separate issues of horse passports and medical treatment of horses are actually inextricably linked by rather complicated legislation, most of which has its origins in the EU, where horses are considered food-producing animals (for humans). At the time of writing, we are still in the EU and as such are also required to consider that any horse might enter the human food chain, unless specifically excluded. It is my understanding that this position is unlikely to change when Britain leaves the EU, i.e. the default position is and will remain that every horse will potentially enter the human food chain unless 'signed out'.

In accordance with legislation, every horse in the UK must have a passport and must be microchipped. As of 2020, the requirement for a microchip will include all older horses. There are a few exemptions, for example for Exmoor ponies and other semi-wild animals.

There are around 80 Passport Issuing Organisations (PIOs) that were or are authorised to issue passports and Weatherbys is one of them. For any horse born in the EU and located in England, an application for a passport must be received by a PIO on or before November 30 in the year of birth or within six months of birth, whichever is the later date. Weatherbys' requirements differ slightly from this; please see its website for more details.

## Key to identification

The horse passport is a document that allows a horse to be correctly identified for the purposes of competition, transportation, import and export, change of ownership, insurance and medical treatment, among other things. It contains a sketch and written description of the horse's markings as well as the microchip number. Information which must be contained in the passport includes the name and/or breeding of the horse; country of birth; gender; age or date of birth; name of the person to whom the passport is issued – usually the breeder.

Other pages are for human consumption status, change of ownership details, vaccinations, medications administered, certain test results and health declarations and movements.

Older passports might not contain all of this information and owners of



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older horses whose passports do not contain the pages concerning the horse's human consumption status are required to return those passports to the issuing PIO to have the pages inserted. Similarly, some imported horses will not be microchipped and might not have human consumption-related pages in their passport. Any passport that does not contain those pages is not considered a 'legal' passport under current legislation and the horse cannot enter the human food chain.

If a passport is lost or stolen, this must be reported to the PIO. A duplicate passport will be issued but the horse will be automatically signed out of the human food chain. The owner or keeper of the horse must also hand over the passport when ownership of the horse changes and the new owner is required to forward the passport to the PIO with new ownership details within 30 days of that transfer of ownership. No person should keep a horse unless it has a passport and no-one should buy or sell a horse without its passport being present.

The passport is meant to remain with the horse, or be available at short notice, if the horse requires veterinary treatment. It should be shown to the vet so that the vet can determine the human food chain status of the horse before treatment is given. If the horse is transported, the passport must accompany it.

## Use of medicines

If we now turn to the use of medicines in horses, we are faced with complicated requirements concerning selection of medicines and record keeping both

for the vet and for the owner. Most of the requirements vary depending on whether or not the horse has been signed out of the human food chain. In newer passports, Section II, part II is a declaration which states that the horse is NOT INTENDED for human consumption. If this is signed, the horse can NEVER enter the human food chain. This declaration cannot be undone.

Section II, part III is a declaration that the horse IS intended for human consumption. If this is signed, the horse MUST NEVER be given certain medicines (prohibited substances) under any circumstances. This declaration can be undone if the owner/keeper chooses to do this by signing Section II, part II – this signature will nullify any signature in the 'intended' section.

If a vet administers a prohibited substance (one that can't be used in food producing animals) the vet must sign Section II, part II to exclude the horse from the human food chain. There is no legal obligation to sign either part II or part III of Section II, unless a prohibited substance is given, but if no declaration has been made then the horse must be treated as though it IS intended for human consumption. In older passports, the human consumption declaration is likely to be in Section IX. If the horse is declared as not intended for human consumption, the PIO should be informed.

Before a vet can administer a prescription medicine to a horse it is necessary for him/her to see the horse's passport to determine the human consumption status of that horse, as

this has enormous bearing on which medicine(s) can be administered or supplied. The owner/keeper MUST provide the vet with the passport when 'reasonably' requested. Unfortunately, often the passport is not with the horse – it might be 'in the office' or 'in the horse box', 'at home' or 'with the owner' etc.

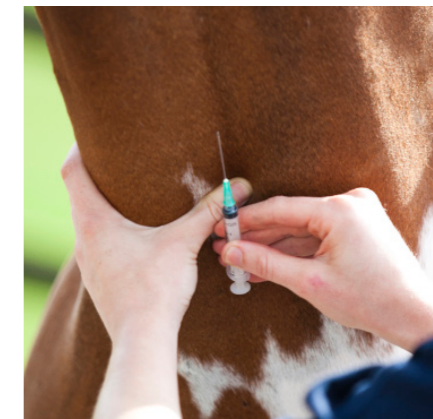
If the passport is not available or the vet is unaware of the horse's food production status, the horse must be treated as though intended for human consumption. Record-keeping requirements are more onerous if the horse is NOT signed out of the human food chain. All vaccinations must be recorded in the passport regardless of the horse's food chain status. In situations where the passport is not available, a written record of medicines administered should be given to the owner with directions as to whether the horse MUST be signed out of the human food chain or other records must be kept.

## Product choice

In veterinary practice, when choosing a prescription medicine to treat a patient, vets are required to choose, wherever possible, a product which is licensed for use in the species being treated for that specific condition. If there is no licensed product for use in that species, vets are legally required to follow the Cascade to choose a suitable product. This allows use of medicines licensed for other species and also humans providing a flow chart approach is followed. Horse vets are legally obliged to use a product licensed for use in the horse first, even if there is a cheaper human or small animal product available.

If the horse being treated is declared as intended for human consumption OR the declaration in the passport is unsigned, there are restrictions on which medicines can be used. Some medicines that are licensed for use in horses in the UK must not be given to horses that are not signed out of the human food chain. Any medicine given to these horses must only contain a substance which is permitted for use in food producing animals. There is a list of these products in Table 1 (Allowed list) of Regulation 37/2010. This list also carries minimum residue limits (MRLs) for target tissues.

Vets must also inform the owner of the period after treatment before the horse can be slaughtered (the withdrawal period). The owner is responsible for keeping a written record of all medicines given, the last date of administration and the meat/tissue withdrawal period. This information does



Preparing for an intravenous injection

not have to be in the passport.

There is no MRL or withdrawal time for phenylbutazone and this MUST NEVER be used in horses that are not signed out of the human food chain. Any horse that is given phenylbutazone must have Section II, part II signed by either the vet or the owner/keeper or their representative to take it permanently out of the human food chain. There are other prohibited substances; these can be found in Table 2 in Regulation 37/2010.

To make things more complicated for horse owners and vets, vets are also allowed to administer to food producing horses a specified list of medicines which are not in Table I of 37/2010. This list is known as the Essentials List (Commission Regulation 122/2013) and actually permits the use of a variety of products that we would not otherwise be able to use in horses intended for human consumption. However, their use must be recorded in the horse's passport along with the last date of administration and a compulsory six-month withdrawal period.

## In an emergency...

Even if the passport is not available, a horse may be treated with a prohibited substance in an emergency if, in the opinion of the attending vet, there is no other more suitable product available. In this instance, the vet must provide the owner/keeper with a written note stating what was administered and stating that the horse must be excluded from the human food chain. This should be in duplicate and the owner/keeper must sign the note to acknowledge that they have received this information. If the owner/keeper is not present, the note should be given to their representative as soon as possible.

## Record keeping requirements for the 'not intended' horse

There are no requirements for owners/

keepers to keep a written record, either in the passport or separately, of administered medicines for horses that have been declared as not intended for human consumption, apart from vaccinations. Vets have specific record-keeping and labelling requirements, regardless of the human consumption status of the animals being treated, and these vary with the type of product that is used.

## Considerations around human consumption status of any horse

From many equine vets' perspectives, professional life would be much easier if every horse was signed out of the human food chain as we wouldn't have to worry too much about which medication was administered, withdrawal times and providing information for owners' record keeping requirements. There is also an animal welfare argument that the 'not intended' horse might receive more appropriate medicinal treatment, particularly in an emergency.

However, while it seems to make sense to sign every horse out of the human food chain because it makes life 'easier', there is potentially a different, but significant, welfare issue associated with this 'non-intended' status. Removing slaughter for human consumption as an alternative route for the disposal of injured or unwanted horses can lead to them being neglected and/or abused. There are significant costs associated with the humane destruction and disposal of a horse, with carcass disposal fees of between £500 and £800 not uncommon.

Horses might not attract a high carcass value if slaughtered for human consumption, but even if a few hundred pounds is paid to the owner for the horse as its 'meat value', this could make the difference between a humane end to that horse's life or prolonged suffering.

Roly Owers, CEO of World Horse Welfare, has recently written a persuasive letter to the Vet Record (November 9, Vol 185 No 18 p577) arguing the case for not signing horses out of the human food chain so that they might be humanely slaughtered for human consumption. Hunt kennels can sometimes take a horse – regardless of its human consumption status – without charging a fee and these horses are usually despatched quickly and humanely at the time of collection/delivery. There are a few medicines that can't be administered to horses destined for kennels and any horse that is euthanased by injection cannot be disposed of in this way.