

# VERENIGING KOEPEL FOKKERIJ



## **Feedback of the Dutch Federation of Equine Studbooks (Koepel Fokkerij)**

on the draft implementing regulation Ares (2021)996533  
laying down rules for the application of Regulations (EU) 2016/429, (EU) 2016/1012 and (EU)  
2019/6.

The Background:

Breeding organisations nowadays operate across borders. Within the EU they do this in accordance with the EU regulations, for instance (EU) 2016/1012.

To be able to operate in other EU Member States, a studbook, according to (EU) 2016/1012 article 12, has to notify the competent authority of the extension of its geographical territory. Many studbooks have acted accordingly and, for instance, have members, breeders and stallion owners in various Member States.

Two articles in this draft will obstruct these inter-Member-State activities: articles 11 and 22.

### **Article 11:**

Article 11(3)(b) states that a foal that is less than 6 months old at foot of their dam is only allowed to travel in a temporary movement to an other member state if they are marked by injectable transponder.

According to current regulations, it is possible for foals, at foot of their dam, to accompany their dam in a temporary movement to another Member State without being injected with a transponder.

Experts, like Prof. Dr. M. Sloet van Oldenruiterborgh-Oosterbaan, head of the equine internal medicine clinic Utrecht University and member of the Ministerial Advisory Committee for Emerging diseases of Animals, state very clearly that foals should never be injected by a transponder before they have reached the age of 6 weeks.

If the dam has to be covered by a stallion in another Member State shortly after giving birth to a foal, the foal, according to the proposed regulations, has to be injected by a transponder. Even if the foal is less than 6 weeks old. This is a situation that experts strongly disapprove of and raises serious animal welfare concerns.

Therefore we suggest that the Committee alters the draft to allow foals aged less than 2 months, at foot of their dam to accompany the dam in temporary movements to other Member States without being injected by a transponder.

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## **Article 22:**

By way of derogation from paragraph 1 of article 11 in (EU)262/2015, a breeder may submit the application for identification documents for equidae born in the Union to the appropriate issuing body in a Member State other than the Member State the holding of the equine animal is located.

For example: a Dutch breeder of a BWP foal born in the Netherlands can submit the application for identification document to the BWP headquarters in Belgium. A Belgium breeder of a KWPN foal born in Belgium can submit the application for identification documents to the headquarters of the KWPN in the Netherlands. And so on.

According article 22 (1) in this draft, the operator shall submit an application for identification documents to the appropriate competent authority in the Member State where the establishment of birth is located. Horse breeders want identification documents for their foals/horses issued by the breeding organisation they are member of. Stating a regional reference for application of the identification documents is not in line with the requirements of the EU Animal Breeding Regulations.

A horse population is characterised by a uniform and recognisable identification document of one issuing body or relevant breeding association, including the zootechnical certificate.

Therefore we suggest the Committee alters the draft to make it possible for breeders to submit the application for identification documents to competent bodies in other Member States.

The Koepel Fokkerij is the federation of Dutch Equine Studbooks.

Ermelo, March 4, 2021