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My Lovely Horse Rescue

**BY EMAIL ONLY**

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Animal Welfare Consultation, 4C  
Department of Agriculture, Food and the Marine  
Kildare Street  
Dublin 2

**RE: SUBMISSIONS FOR A NEW ANIMAL WELFARE STRATEGY**

Dear Minister Creed,

Further to the recent Animal Welfare Conference 2018, My Lovely Horse Rescue welcome the creation of a new Animal Welfare Strategy and would like to thank the Department of Agriculture, Food and the Marine for the opportunity to attend the conference and to make the submissions below.

**About My Lovely Horse Rescue (MLHR)**

My Lovely Horse Rescue is a not-for profit voluntary organisation operating in the Leinster and Cork region. We assist authorities in moving equines to a place of safety, rehabilitating and rehoming equines and other animals, advocating for greater awareness and enforcement of legislation and responsible horse ownership. MLHR is a member of the Dublin Region Horse Welfare Forum.

## Submissions by MLHR

### ***Have we reflected the most relevant perspectives in respect of animal welfare research and theory in section 4?***

MLHR concur with the majority of the findings in this section. However, we have the following submission:

**SUBMISSION:** The welfare of an animal that can be kept for leisure, companion and or as a farm animal must be treated equally in legislation and enforcement across all sectors.

### ***Does the vision for animal welfare show the correct level of ambition?***

The vision in the strategy is commendable:

“Ireland becomes increasingly recognised as a country that promotes and assures the welfare of all animals.”

However, MLHR has a number of submissions with regards to the details:

- a. “Supporting Excellence Standards – While simultaneously ensuring minimum acceptable standards are enforced Ireland will support initiatives whereby many animals are housed and cared for in even better ways.”

**SUBMISSION:** MLHR proposed this sentence be amended to read as follows:-

“Supporting Excellence Standards – While simultaneously ensuring minimum acceptable standards are enforced Ireland will support initiatives whereby **all** animals are housed and cared for in even better ways.”

**SUBMISSION:** “minimum acceptable standards” to be clearly defined in legislation by species and breed.

- b. “Ireland will be fully engaged at the centre of the international dialogue about best practice in animal welfare.”

**SUBMISSION:** That the ‘dialogue’ be advertised/broadcast to as diverse an audience as possible and to be seen as a cross-sector dialogue, to include, but not be exclusive to farming sectors, wildlife organisations, animal welfare/rescue organisations, sports and

leisure industry, professionals and non-professionals involved in those industries.

- c. "It becomes the norm that everyone dealing with animals is trained or educated to an appropriate level."

**SUBMISSION:** Education on legislation appertaining to animal welfare and compliance to be part of the Garda Training College curriculum (and part of Continuing Professional Development days).

**SUBMISSION:** Animal welfare/husbandry to be taught in all schools to include building an awareness of how food is produced, from farm to fork and to include examining empathy and compassion for the welfare of an animal. Second and Third Level modules/courses to be funded to encourage training in legislation relating to animal welfare and compliance.

**SUBMISSION:** Recognised standards for the keeping of animals to referred to in codes of practice and legislation with regards to licensing, bye-laws, Acts etc. Codes of Practice to be more binding with regards to legislation and enforcement - or made into clearly defined law.

**SUBMISSION:** DAFM to encourage the Judiciary and legal professions to upskill members on legislation relating to animal welfare and compliance.

- d. "Ireland becomes better recognised for its high level of animal welfare standards."

**SUBMISSION:** Define what system to use to benchmark standards and define where Ireland currently ranks and where we would like to see Ireland ranking in ten years' time. High welfare standards to include best practices with regards to living conditions, transport of live animals and slaughtering practices. The Irish government to drive change and improvements, to be proactive rather than be reactive (or nonreactive) to social media and lobbies.

- e. Improved animal welfare outcomes will ultimately benefit the economics of farming.

**SUBMISSION:** Amend this sentence to read as follows:-

"Improved animal welfare outcomes will ultimately benefit the economics of farming, tourism and sport."

**SUBMISSION:** The rise in demand from markets abroad not to be to the detriment of animal welfare and Ireland's reputation as a 'green' country (e.g. intensive farming, live exports).

**SUBMISSION:** Ireland to consider the welfare of animals in other countries with respect to the ingredients in feed supplied to animals in Ireland e.g. palm oil - linked to the destruction of the habitat of the Oran Utang, soya from Brazil - linked to destruction of rainforest, notwithstanding the carbon footprint of transporting such goods.

**SUBMISSION:** Ireland's welfare strategy to focus on encouraging the rearing and production of products from animals as local as possible, with consumers shopping locally, therefore, reducing e.g. transport time, distress for animals in transport. Clear labelling so that customers can see how the animal that was involved in the production of the meat, leather, wool etc. was reared and slaughtered so the customer can make an informed decision.

***Should there be greater focus on the role of other and non state organisations and institutions?***

**SUBMISSION:** State organisations should coordinate with and take input from as wide a range of non-state organisations as possible.

***Are the Strategic Principles correct?***

(a) Roles and Responsibilities

**SUBMISSION:** An Garda Síochána and Authorised Officers under the Animal Health and Welfare Act 2013 to be included as having a role and responsibility.

(b) Working in Partnership/Coordination amongst Stakeholders

**SUBMISSION:** The following range of organisations listed is quite narrow:

"The Farmed Animal Welfare Advisory Committee (FAWAC), the IPAAG (Irish Pet Advertising Advisory Group) and the Greyhound Forum all play an important role in bringing stakeholders together".

The strategy document to list a much broader range of organisations or amend to 'DAFM'.

**SUBMISSION:** All committees / forums must have aims and objectives with actions and timelines clearly defined. The Office of the Revenue Commissioners to be included to ensure compliance with regard to taxation, grants and benefits. Short term projects to focus on specific issues e.g. urban horse welfare issues in Dublin and Limerick horses, sulky racing, puppy farming, but link in with 'bigger picture' projects e.g. overbreeding, poor breed quality, national enforcement of e.g. equine ID. Smaller projects to receive support from top level projects and vice versa, facilitated by DAFM.

(c) Focus on Scientific and Evidence based Animal Welfare Research.

**SUBMISSION:** MLHR agreed with this and would be keen to see regular updates and that the public is kept informed/aware of the Strategy and how it is being incorporated into animal welfare standards. Link also with EU and international initiatives/best practices.

(d) Improved Measurement of Strategic Implementation.

**SUBMISSION:** By incorporating An Garda Síochána into the point above regarding Roles and Responsibilities, statistics on the numbers of reports of breaches in the law reported to Gardaí to be logged by Gardaí on IT systems (PULSE) and that relevant data be made available to the Central Statistics Office.

**SUBMISSION:** Clear definitions to be introduced to collating the final destination of animals that pass through animal welfare organisations and pounds. Clarifying terms such as 'rehomed'. All data to be collated by DAFM to ensure a clear picture on what happens to animals 'seized' or 'moved to a place of safety'. Link data with microchip numbers.

**SUBMISSION:** More detailed information on 'type' of equines seized to be recorded by horses pounds, to assist in identifying trends (by area).

(e) Enhanced, sensitive, fair and robust enforcement

**SUBMISSION:** "Enhanced, sensitive, fair and robust enforcement" to be defined. Ireland currently has 13,739 Gardaí (as per [www.garda.ie](http://www.garda.ie) October 2018), yet in the experience of MLHR, very few are aware of their powers under the Animal Health and

Welfare Act 2013, Control of Horses Act 1996 and related legislation. In our view, enforcement is not currently 'robust' and in order to confidently say that enforcement is 'robust', MLHR proposed that all Gardaí must have a basic knowledge and understanding of the legislation and that a specific number of Gardaí to be trained to specialise in the area of animal welfare enforcement.

The number of calls made regarding equines to DAFM Animal Welfare hotline compares badly with actual number of prosecutions, indicating low enforcement levels (reference: <https://www.kildarestreet.com/wrans/?id=2018-10-02a.1210&s=calls+animal+welfare+hotline#g1212.r>). However, if the issuing of 'Welfare Notices' is deemed to be effective 'enforcement' then it must only be deemed 'effective' if the perpetrator improves the welfare of the animal and desists from reoffending. Statistics to be available for same.

**SUBMISSION:** Reference is made in the Strategy Document to the number of prosecutions under the Animal Health and Welfare Act 2013. However, no reference is made to the number of prosecutions under the Control of Horses Act 1996. Enforcing equine ID legislation to ensure all equines in the country are microchipped and have a valid passport is fundamental to ensuring accountability and should be prioritised on a national level.

**SUBMISSION:** The following sentence is quite vague with regards to 'arrangements' and 'working well':

*"Overall arrangements in the area of enforcement have been working well".*

MLHR suggest removing the above sentence or clearly defining 'arrangements' and 'enforcement'.

**SUBMISSION:** Awareness amongst the general public, especially in urban areas, is poor on 'who to contact' with regards to welfare incidents or straying animals. MLHR suggest DAFM provide clarity on 'what to do/who to contact' via awareness campaigns. More people reporting genuine incidents coupled with authorities actively investigating incidents will lead to more robust enforcement.

**SUBMISSION:** "a risk based approach should inform enforcement so that those areas or types of animal most in need are prioritised" - this sounds like not enough resources, so some animals are going to lose out.

**SUBMISSION:** Sentencing for offences to be reviewed to ensure sentencing acts as a strong deterrent.

***Is the balancing approach on enforcement appropriate and correct?***

**SUBMISSION:** MLHR are in agreement on this, but would like to see a regular review process with clear milestones and timelines.

***What areas of research should be considered for animal welfare?***

**SUBMISSION:** The strategy to gather input from criminologists and other relevant professions into the links between animal cruelty and other crimes and on how both can be identified earlier in children and prevented or tackled.

**SUBMISSION:** Fostering greater collaboration and sharing of experience and data between human and veterinary professions.

**SUBMISSION:** Reinforce animal welfare principles and offer animal husbandry modules at primary, secondary and third-level.

**SUBMISSION:** The health and welfare of Ireland's wildlife and eco-systems to be reviewed as a whole and strategies and projects put in place by DAFM as soon as possible to ensure Ireland has a diverse and healthy eco-system, that can benefit humans and animals/nature.

The strategy could be guided in this regard by the Living Planet Report 2018 (World Wildlife Fund

[https://c402277.ssl.cf1.rackcdn.com/publications/1187/files/original/LPR2018\\_Full\\_Report\\_Spreads.pdf](https://c402277.ssl.cf1.rackcdn.com/publications/1187/files/original/LPR2018_Full_Report_Spreads.pdf) ).

**SUBMISSION:** The Animal Welfare Strategy to be at the core of all decisions regarding the flow and distribution of revenue and grants by DAFM.

This concludes the MLHR submissions on the Animal Welfare Strategy and we look forward to reviewing the next version of the strategy document.

Yours faithfully,

**My Lovely Horse Rescue**