

Rhif: WG35090



Llywodraeth Cymru
Welsh Government

Llywodraeth Cymru
Ymgynghoriad – Crynodeb o'r Ymatebion

Cod Ymarfer er Lles Ceffylau

Mai 2018

Crynodeb o ymatebion i'r Ymgynghoriad ar y Cod Ymarfer er Lles Ceffylau Cyflwyniad

O dan Ddeddf Lles Anifeiliaid 2006 ("y Ddeddf"), os ydych yn berchen ar anifail neu'n gyfrifol am un, mae dyletswydd gyfreithiol arnoch i gymryd camau rhesymol i sicrhau bod ei anghenion lles yn cael eu diwallu. Mae'r Codau Ymarfer yn esbonio'r hyn mae angen i chi ei wneud er mwyn cyrraedd safon y gofal sy'n ofynnol yn ôl y gyfraith.

Roedd y Cod Ymarfer presennol er Lles Ceffylau yn adlewyrchu'r wyddoniaeth a'r ddeddfwriaeth a oedd mewn grym ar yr adeg honno a chafodd ei lunio o dan Ddeddf Lles Anifeiliaid 2006. Roedd angen adolygiad i fynd i'r afael ag unrhyw newidiadau yn y meysydd hyn ac i sicrhau bod y safonau a gynghorir yn parhau i fod yn briodol.

Gweithiodd swyddogion Llywodraeth Cymru gyda Rhwydwaith Lles Anifeiliaid Cymru i adolygu a diweddarau'r Cod i ymgynghori arno. Mae Llywodraeth Cymru yn ddiolchgar i'r Rhwydwaith am ei amser a'i argymhellion arbenigol.

Yr Ymgynghoriad

Nod yr ymgynghoriad cyhoeddus 12 wythnos oedd rhoi'r cyfle i asiantaethau gorfodi, grwpiau buddiannau arbenigol a'r cyhoedd ystyried y diweddariad o'r Cod Ymarfer er Lles Ceffylau yng Nghymru a gwneud sylwadau arno.

Gofynnwyd un cwestiwn:

"Mae'r ymgynghoriad hwn yn holi barn ar arddull, cynllun a chynnwys y cod a'r wybodaeth, y cyngor a'r canllawiau y mae'n ei gynnwys. Mae'n bwysig eich bod yn rhoi cymaint â phosib o wybodaeth a thystiolaeth i gefnogi eich barn. Bydd hyn yn helpu inni sicrhau bod y cod yn fwy cywir ac o ansawdd gwell. Mae croeso ichi gynnig sylwadau ar unrhyw ran o'r cod." "

Cafwyd 12 ymateb i'r ymgynghoriad. Darperir rhestr o ymatebwyr, sy'n cynnwys sefydliadau ac unigolion, yn Atodiad 1. Darperir isod enghreifftiau o'r diwygiadau a'r ychwanegiadau at y Cod a argymhellwyd gan ymatebwyr, yn ôl yr adran y maent yn berthnasol iddi:

Dyletswydd Gofal

"When considering taking on an equine, thought has to be given to retirement options and potentially euthanasia in the end to avoid unnecessary suffering to the animal." (Wales Heads of Trading Standards (WHoTS) – Wales Animal Health Panel)

"Owners should consider the cost of transportation and/or disposal in the event of injury or death of their horse." (British Veterinary Association - BVA)

"The horse's need for company should be considered. Horses are herd animals and should preferably be kept on premises with other horses." (BVA Members)

"Considerations before buying a horse should also include how whether [sic] a horse will have access to company from other horses as well as regular interactions with their keepers." (Blue Cross)

Amgylchedd – Iloches

"My horses, one a warmblood and the other a TB cross live outdoors all year so I think the emphasis on hardy breeds is misleading. English code wording is much better. And thick coat not needed if horses are rugged." (Equine Sector Steering Group)

"We would like to add that donkeys need hard dry standing." (Blue Cross)

“Although we agree that some hardy breeds such as native ponies are capable of living outdoors throughout the year provided they have some form of shelter from the elements, we would like to see some reference to the need for access to hard standing/stable for the purposes of veterinary treatment should it be required.” (British Veterinary Association)

Amgylchedd – Stablau/Adeiladau cadw anfeiliaid

“Doors should be at least 4 feet (1.2 metres) wide, and comprise of a top and bottom door. Doors must open outwards and the bottom door should be of a height that allows the horse to look out with the head comfortably over the door. They should be capable of being securely fastened with top and bottom bolts. During stable design consideration should be given to prevailing winds to ensure adequate ventilation with good air circulation, whilst avoiding excessive draughts.” (Anonymous)

“I do not agree that there needs to be a top door in most cases.” (Anonymous)

“Stables may also have a top door, which should be capable of being secured in the open position. Not a requirement to have a top door.” (Equine Sector Steering Group)

“This advice is dated and excludes a lot of acceptable modern stabling arrangements, such as indoor barn style stabling, which have no top doors, and doors that slide across rather than opening outwards.” (BVA Members)

“All electrical installations at mains voltage must be installed, maintained and periodically inspected and tested by a competent electrician and in accordance with the latest edition of the Institute of Electrical Engineers wiring regulations.” (Countryside Alliance)

Amgylchedd - Porfa a Ffensys

“Pasture - Should this also include that if a stabling or yard area is not available, a safety enclosed area of hard standing should be available to facilitate routine and emergency treatment.” (Equine Sector Steering Group)

Re donkeys – “Add a paragraph - For overweight animals, and those suffering from obesity related disease such as laminitis, the quality and area of grazing, and the number of hours spent grazing, will need to be restricted. Overweight animals may therefore need to be managed in a separate group to those of the correct body weight. Advice should be sought from a veterinary surgeon.” (BVA Members)

“it might be helpful to advise that fencing should be checked on a daily basis i.e. to ensure that there is no evidence of damage that could cause either injury to a horse or provide a means of escape.” (RSPCA)

“Check other advice- if use barbed wires it should be protected? Wording in the English version flows better. Potential to create numerous breaches of the code for using barbed wire without protection.” (Equine Sector Steering Group)

“we feel it would be helpful to list the types of fencing suitable for horses.” (Blue Cross)

Amgylchedd – Planhigion Gwenwynig

“I suggest adding something on dangers of ragwort in hay either here or in feeding section.” (Equine Sector Steering Group)

Amgylchedd – Cadw golwg

“Should there be reference here to the need to check tethered horses more frequently?”
(Equine Sector Steering Group)

“We feel that this [picking hooves out daily] is not at all practical for horses kept outdoors in groups. We also note that there is no mention at all of lameness (it is recognised in 1.24 briefly when it states that “particular attention should be paid to their gait” but lacks definition / further information). Lameness could be caused by several factors, a kick, impacted foreign material etc and should be carefully monitored or receive veterinary treatment.”
(Countryside Alliance)

Deiet - Dŵr

“Natural water sources should not be used if there is a risk of horses falling in, becoming trapped or causing environmental damage to access points.” (BVA Members)

“Fresh water should be supplied in clean buckets” will be wholly impractical in some cases, particularly for horses kept in groups. We would suggest “suitable clean drinking vessels” which could be metal troughs, buckets or automatic drinking vessels etc.” (BVA Members)

“Checked regularly is open to interpretation, and automatic troughs should also be checked in case they aren't working. Change to: Troughs, including those that fill automatically, and buckets should all be checked at least once a day.” (BVA Members)

Deiet - Bwyd

“It is important that any change in a horse's diet is made gradually, over an appropriate period of time. This includes moving to a new grazing pasture, or changing from twenty-four grazing to being stabled and fed hay. This can help prevent problems such as colic (abdominal pain) which is a very common disorder of horses, and is often associated with changes in diet and management.” (BVA Members)

“Under the section about diet, you could include that it is recommended to give electrolytes to horses that are in work/training, particularly after strenuous exercise/sweating excessively.” (Gaby Struel)

“Healthy horses fed on good quality grazing or hay do not usually require additional feeding of concentrates (cereal-based feeds). Horses required to maintain high levels of exercise and fitness, may sometimes require additional feeding. However, feeding large amounts of concentrates to an animal that is designed to eat fibre, can have a detrimental effect on its gut health.” (BVA Members)

“owners/keepers requiring more detailed guidance about the weight and diet of their horse or donkey should seek advice from their equine veterinary surgeon in the first instance. This suggestion is made as weight gain or weight loss may sometimes be indicators of a welfare/health concern.” (RSPCA Cymru)

Ymddygiad

“It might be beneficial to add some introductory advice on equine behaviour. It would be helpful to include a sentence emphasising the importance of understanding the species-specific behaviours of horses, donkeys and mules.” (RSPCA Cymru)

“I think this section needs an introduction that explains that horses have a need to exhibit normal behaviours, and that preventing them from performing these behaviours can affect their physical health and cause them to develop behavioural problems. Normal behaviours include the need to graze/eat forage or fibre-based feeds for 16-20 hours a day etc.”

(Equine Sector Steering Group)

“It is not stated in the environment section – but horses need company and need to spend a lot of time eating/browsing. Not having either /both of those is the main cause of a lot of behaviour problems.” (Equine Sector Steering Group)

Ymddygiad – Hyfforddiant

“Advice should also be sought from an SMS Registered Qualified Saddle Fitter as poorly fitting saddlery can be a major cause of discomfort which results in undesirable behaviour.”

(The Society of Master Saddlers)

Cwmni - Ymddygiad Cymdeithasol

“It may be beneficial to keepers/owners if the wording ‘it is important to be aware of behavioural conflicts within a group of horses’, or similar wording, be used. It is very important to identify if any horses within a group are incompatible, or become incompatible, for whatever reason. This is to protect the health, safety and welfare of the horses in the group and the humans handling them.” (RSPCA Cymru)

Iechyd - Gofal iechyd cyffredin

“This section explains importance of having the regular checks for teeth, worms, flu & tet jabs etc. This should also include regular checks of saddle, bridle & bit fitting, along with checking the saddlery items for rotting, loose stitching and general wear and tear that needs some attention before it becomes a safety issue for the horse and rider.” (Society of Master Saddlers)

“Vaccination: Infectious disease prevention and biosecurity protocols are vital considerations in the care of horses, It may be important to highlight that horses can also be vaccinated against some infectious diseases, such as equine influenza, and that owners should seek advice from their equine veterinary surgeon to determine what is appropriate for their individual horse.” (RSPCA Cymru)

“We would also like to see references to Equine Dental Technicians removed from this section as the title is not protected and ‘qualified’ in this context is difficult to define.” (British Veterinary Association)

Iechyd - Atal Clefydau (Bioddiogelwch)

“Equine Influenza isn’t mentioned in the Health or Disease Control sections, this is a highly contagious but preventable disease against which every horse should be routinely vaccinated.” (WHoTS)

Cludo ceffylau

“it would be helpful to include a brief summary of the factors to consider when planning to transport horses or donkeys, in order to ensure their welfare needs are met during any

journey (short or long), for example, giving adequate consideration to the animal's requirement for feed, water and rest, that the vehicle is safe and in good working order, including passport requirements, etc. In addition, careful consideration should be given to any specific welfare requirements, for example, if transporting pregnant mares." (RSPCA Cymru)

Sylwadau cyffredinol:

"Blue Cross believes the code of practice is a good document which covers all the major factors when it comes to meeting the welfare needs of horses. The draft document covers a wide range of issues and therefore is a sizeable document. We believe that it is essential that the document is presented in a useable format not only for enforcers but also for horse owners themselves. Blue Cross would suggest the Welsh Government look at producing shorter step by step guides for individual aspects of the code of practice and also consider how to present the document in an online or mobile format which would make it more user friendly. We believe the document could include more links to further information than is currently included." (Blue Cross)

"We welcome the opportunity to comment on the draft Code of Practice and we broadly support the contents of the draft, subject to some minor amendments and clarifications suggested below." (British Veterinary Association)

"The Countryside Alliance are pleased to respond to the Welsh Government's consultation on the draft Code of Practice for the Welfare of Horses." (Countryside Alliance)

"I have reviewed the consultation document "Code of Practice for the Welfare of Horses" and broadly welcome its common-sense approach and providing a baseline set of guidance for equines in Wales." (Anonymous)

"Members responding to this consultation generally believed that the Code was practicable and proportionate and considered it to be in line with many of the activities and recommendations included in other species Codes relevant to the sector." (Farmers' Union of Wales)

"Envirowatch.EU wholly supports the new Guidance: because when in regular traversing in the countryside for various reasons, we see much neglect of horses and donkeys, especially when their 'toy/ pet' use has faded or for other reasons [sic]. Thus regularly complaints are made to the relevant enforcement bodies." (Envirowatch.EU)

"RSPCA - Document Design & Language: Some owners or keepers may personally own, or care for, a range of companion animal species (dogs, cats, rabbits and horses), therefore, it is important to ensure consistency of design and generic language across the Codes of Practice for all species. The use of colour and images, as in the previous version of the equine Code, is considered appropriate and beneficial. (RSPCA Cymru)

Cross Reference Information: It might be helpful to signpost important website links, as well as the Appendices, within the main body/text of the Code. (RSPCA Cymru)

Code Promotion: Evidence¹ suggests that awareness of the Codes amongst the animal owning population is generally limited, despite its online availability. Hardcopies are not easily available. We would therefore welcome a discussion - perhaps with our partner organisations on the Animal Welfare Network Wales - on how best to make the Codes more accessible. The RSPCA would recommend a user-friendly online format of the Code which is also fit for purpose for all platforms (such as mobiles). (RSPCA Cymru)

Donkey Information: Recent research states that donkeys, mules and hinnies should not be viewed as small horses or ponies. There are some specific variations between these equine species and their breed specific needs. Some new information on donkeys is included in the latest equine Code draft, which is very helpful. It may be helpful to highlight these differences further, for example, in the Behaviour and Health sections of the document. Even if it is simply to provide a cross reference to the 'Sources of Information' section and 'The Donkey Care Handbook' published by The Donkey Sanctuary, it would also be helpful to advise that owners or keepers can seek advice about these animals' specific needs from their equine veterinary surgeon. (RSPCA Cymru)

Summary Versions of the Codes: The current versions of the Codes of Practice for the Welfare of Cats, Dogs and Rabbits have summaries. If these are to be retained it would be helpful to adopt the same approach with the equine Code depending on how accessible the Code will be online." (RSPCA Cymru)

"We are in support of the code in general" (Wales Heads of Trading Standards (WHoTS) Wales Animal Health Panel)

Camau Nesaf

Caiff sylwadau a diwygiadau a awgrymwyd, lle y bo'n briodol, eu hymgorffori yn y Cod. Caiff drafft terfynol o'r Cod ei osod gerbron Cynulliad Cenedlaethol Cymru am 40 diwrnod. Ar yr amod na fydd y Cynulliad yn penderfynu peidio â chymeradwyo'r drafft, gall Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig gyhoeddi'r Cod ar ddiwedd y cyfnod 40 diwrnod.

Caiff yr holl randdeiliaid ac ymatebwyr i'r ymgynghoriad wybod pan gaiff y Cod newydd ei gyhoeddi.

ATODIAD 1

Rhestr o ymatebwyr:

Y Groes Las

Cymdeithas Milfeddygon Prydain – ymateb cyffredinol

Cymdeithas Milfeddygon Prydain – ymatebion aelodau

Y Gynghair Cefn Gwlad

Undeb Amaethwyr Cymru

Gaby Struel

Dr Klaus Armstrong-Braun, Envirowatch EU

RSPCA

Cymdeithas y Meistr Cyfrwywyr

Panel Iechyd Anifeiliaid Cymru Penaethiaid Safonau Masnach Cymru.

Grŵp Llywio'r Cyngor Sector Ceffylau

Gofynnodd un ymatebydd am gael aros yn ddiennw