End of a horse life –
The horse as part of the food chain.

Concern of the welfare of the horse throughout the entire lifetime of the horse must be expressed at all stages. It is inevitable, that the horse will die at some point, whether this includes slaughter or euthanasia. Taking care of the end stage of a horse’s life therefore always will be a part of responsible horse ownership and part of horse welfare. The need for humane slaughter and disposal of horses as a natural consequence and a natural part of keeping horses for sport, pleasure, work and/or food production must be recognized. It is therefore vital for the welfare of the horse that veterinary medicinal legislation takes care of both the need to treat sick horses with appropriate medicines as well as ensuring that meat form the animal does not present a risk to public health.

The current veterinary medicinal legislation addresses this issue, as a horse via the passport and a national database can be excluded from being used for human consumption. A list of substances vital for maintaining the welfare of the horse has already been established, so these products can be used, if the horse is excluded from being used for human consumption for half a year. It is vital for both the welfare of the horse and for the horse industry, that this list is maintained and extended most widely. It is the view of the industry that the use of a majority of the licensed veterinary medicinal products will cause no harm to public health, if a safe withdrawal period of half a year is enforced. Having a significant proportion of the care horses excluded from the human food chain does raise the possibility of creating a welfare problem in itself, when the horses have to end their life and have to be disposed of by costly destruction procedures.

The Horse & Veterinary Medicinal Products

Without animals of good health status there is no horse industry in Europe, whether it concerns sport, pleasure or breeding. Good health status however requires the availability of a sufficient number of veterinary medicinal products. Transparent and non-bureaucratic veterinary medicinal legislation is vital for horse owners and professionals working with horses.

The EU legal environment on the manufacture, authorization, marketing, distribution and use of veterinary medicines was adopted in 2001. Over the years, this regulatory framework has been amended in response to scientific advances and the needs of the veterinary sector. However, the current legislation is no longer fit for purpose and stakeholders have reported an overall lack of authorized veterinary medicines for minor species, for rare or emerging diseases and for some diseases in major species. This lack of veterinary medicines poses significant animal health and welfare problems, increased risks for human health, and economic and competitive disadvantage for EU farming.
Availability of medicines

The horse industry welcomes the long awaited EU Commission proposal for new legislation in the field of Veterinary Medicinal Products\(^1\), but is disappointed to see that the Commission did not propose more significant steps towards a single EU market for veterinary medicines.

The market for veterinary medicinal products for use in horses is of limited economic value for the pharmaceutical companies. If products only are registered and marketed in the larger countries, as the practice is now, horses in the smaller countries will suffer welfare issues because of lack of availability. A significant step towards a single EU market would therefore be that a veterinary medicinal product would be available for use in all EU countries, if registered and marketed in one of the EU member countries. The principle laid down in the regulation, that once a marketing authorization is given, it should be valid throughout the European Union, is supported by the industry. However, it is suspected that through keeping all the different authorization and distribution channels, this principle is unlikely to become reality.

The industry embraces the small steps made towards a single market, such as the extension of the centralized authorization procedure and the harmonization of the classification of medicines and withdrawal periods. Nevertheless, we strongly believe all legislators should show political will to take further steps towards a single market, such as by providing financial and administrative support to the pharmaceutical companies to use the central authorization procedure. Consistent and transparent channels of distribution should be in place which can be monitored and controlled by the authorities. Whatever the distribution system is, it is essential that veterinary practitioners can fulfil their role as responsible and accountable gatekeepers.

As the number of authorized veterinary medicines is limited, veterinarians often face situations where no suitable veterinary product is available in their country to cure a specific disease. The continuing possibility for veterinarians to utilize products outside the terms of the marketing authorization (art 115-120 in the proposal) is therefore essential and welcomed; especially for species such as the horse. Without the flexibility provided by these articles, animal health and welfare will suffer.

\(^1\) Proposal for a Regulation on Veterinary Medicinal products, COM (2014) 558 final

Responsible use of medicines – Antimicrobial resistance

It is recognized that the regulation proposal of veterinary medicinal products encourages the responsible use of medicines in the interest of sustainable animal health, welfare and public health. Medicines should not be used to mask problems caused by inappropriate husbandry or nutrition, and the correct administration of medicines to animals must be advocated.

The responsible use of veterinary medicinal products and the prevention of antimicrobial resistance is a major concern of the entire horse industry. Responsible use however is closely linked to availability. A newly published survey among the members of the Federation of European Equine Veterinary Associations (FEEVA) clearly showed that the most common reason not to use the appropriate antibiotic in a given situation was lack of availability in the country where the product was to be used.

Horse welfare

Horse welfare is also human welfare, as sick and unhealthy horses always will be of major concern for the people keeping them and using them for sport and leisure. Good and proper access to appropriate medicines through their veterinarian for any sick horse is therefore of major concern for any horse owner.

The interpretation and reinforcement of any piece of legislation concerning veterinary medicinal products must therefore always be in favour of the horse and the welfare of the horse. It is vital for the welfare of all horses, that bureaucratic procedures are not given more precedence than the welfare of the single horse.