

Annex A: table of regulations where options have been taken and reasons why

Legislative measure	Current arrangements, in Wales (under Regulation 504/2008 and the Equine Identification (Wales) Regulations 2009)	Intended approach and rationale underpinning it
Regulation 2015/262 allows Member States to require that the owner of a horse must be responsible for identifying a horse (Article 3(3)).	Only an owner may apply for an identification document (Regulation 5(3)).	<p>We intend to maintain the current position that the owner is responsible for applying for and obtaining a horse passport.</p> <p>We believe that these arrangements work well and that any change would introduce new or transitional costs to businesses.</p>
Regulation 2015/262 allows Member States the ability to set more restrictions on the format of a passport.	PIOs must ensure that the format of their passport conforms to the model document set out in Regulation 2015/262.	We do not intend to set more restrictions on the format of the passport than already exist but we reserve the right to do so in the future if the need arises. The PIOs must ensure that the format of their passport conforms to the model document set out in Regulation 2015/262.
Regulation 2015/262 requires Member States to set the time limit for the submission of the passport application..		Regulations 2015/262 requires that MS stipulate a date by which a PIO must receive an application form for a passport. One calendar month is considered to be an appropriate timeframe to set. The time limit should be achievable by all types of PIO, as different sized PIOs may have different processing times. View are being sought on this point.
Regulation 2015/262 allows Member States to allow the use of smart cards instead of passports as a method of identification when an equine travels / moves	Smart cards may be used for the movement of or when travelling an equine as an alternative to passports.	<p>The Welsh Government intends to make use of the derogation which allows equines to travel with a smart card.</p> <p>Smart cards could provide greater flexibility to horse owners. The Welsh Government is prepared to consider the use of smart cards if a suitable provider comes forward at some future time.</p>

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instead of carrying its equine passport .		Stakeholder contact, has indicated that, in reality it is an option that is unlikely to be exercised even though it would be provided for in the Regulations.
Regulation 2015/262 allows Member States the ability for microchips to be inserted in a different place in a minority of horses.	Microchips are inserted between poll and withers in the middle of the neck in the area of the nuchal ligament of the horse.	<p>We will continue to maintain the status quo of implanting a micro chip between the poll and withers in the middle of the neck in the area of the nuchal ligament. It is not intended that the implantation will be permitted in a different place.</p> <p>We believe that the standardisation of this practise saves time and cost to all microchip reading businesses and vets.</p>
Regulation 2015/262 requires Member States to set rules to ensure microchip numbers are unique.	Vets are responsible for inserting uniquely numbered microchip.	<p>We will maintain status quo requiring vets to only insert ISO compliant microchips that are uniquely numbered.</p> <p>We believe that alternative options for ensuring the uniqueness of microchip numbers are more onerous on business and government and may require additional investment in complicated systems.</p>
Regulation 2015/262 requires Member States to set rules regarding the minimum qualification for inserting a microchip.	The minimum qualification is membership of the Royal College of Veterinary Surgeons	We will maintain status quo that the minimum qualification required to insert a unique microchip under these regulations will be membership of the RCVS.
Regulation 2015/262 allow Members States to exercise a derogation not to complete a silhouette subject to a microchip being present and a photograph of the animal.		The Welsh Government does not intend to exercise this derogation. The silhouette is widely supported as being necessary within a horse passport. Photos supplied as a foal at the time the passport was issued are not considered to be representative of the horse in later life (e.g. horses can change colour with age).

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Regulation 2015/262 allow keepers to apply for passports to an issuing body which has its head quarters in another Member State	Continue to permit this activity	This will be permitted in line with the current position.
Regulation 2015/262 allows for alternative methods of identification verification, such methods (e.g. marking horses) are not to be used as the sole means of identity verification.	Microchips are recognised as the main way of verifying identity.	The Welsh Government sees microchips as the main component of identification verification.
Regulation 2015/262 allows for the movement and transport of equines under the age of 12 months from their holding of birth to slaughter provided there is uninterrupted traceability from the holding of birth, the equidae are individually marked during transport and are accompanied by Food Chain information.	No arrangement in place.	The Welsh Government does not intend to exercise this derogation. Whilst semi feral foals have been able to move straight to slaughter under strict conditions the Welsh Government does not believe that it is possible to guarantee the same strict criteria for equines up to 12 months of age being moved from other holdings of birth.