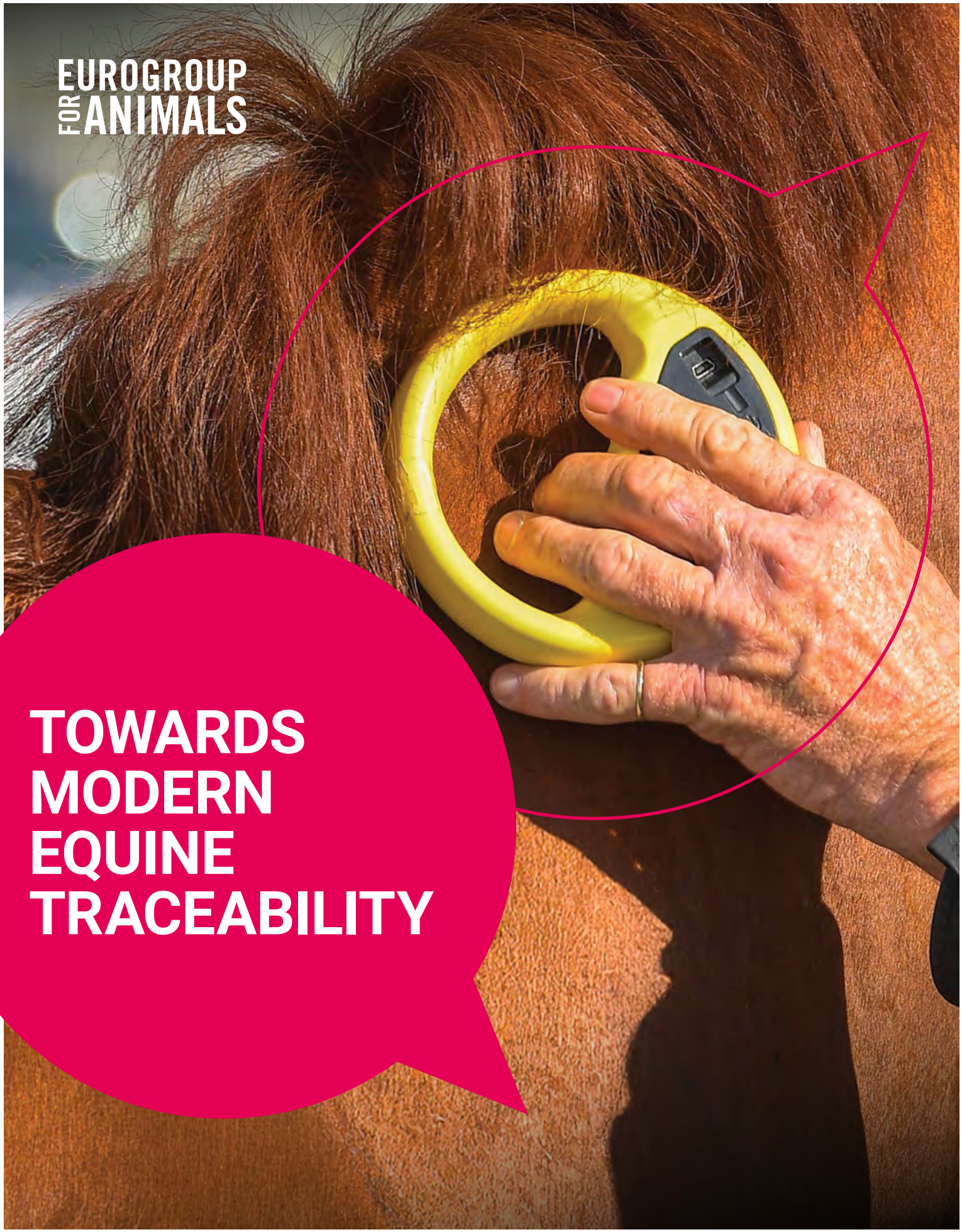
EUROGROUP FOR ANIMALS

TOWARDS MODERN EQUINE TRACEABILITY



ANIMAL ACTION GREECE

AWF ANIMAL WELFARE FOUNDATION

THE DONKEY SANCTUARY

ippothesis

NSPCA National Society for Prevention of Cruelty to Animals

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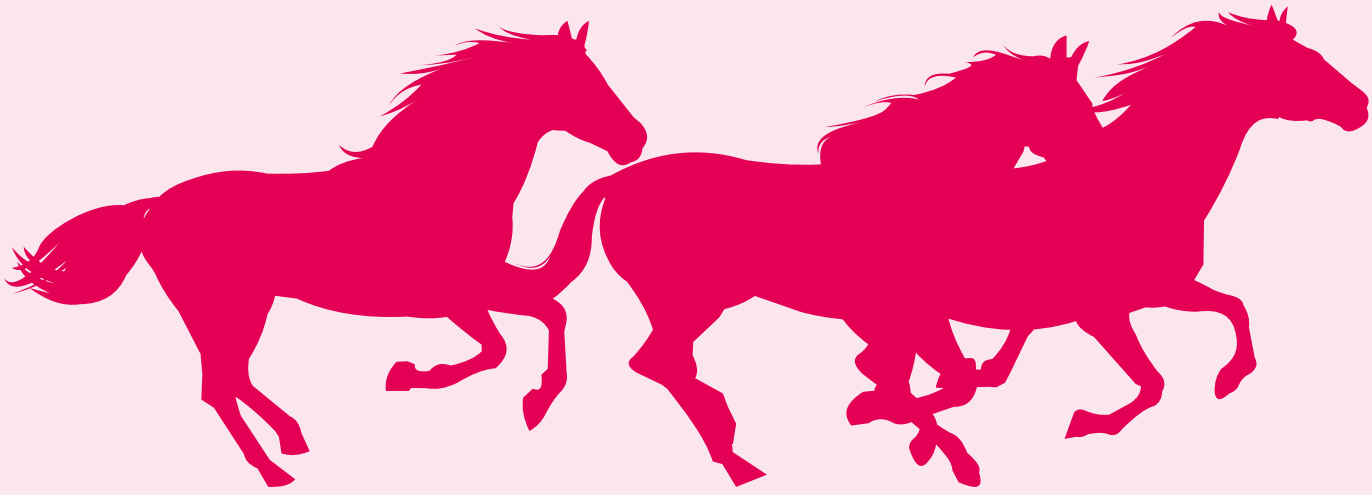


EXECUTIVE SUMMARY

The current system for equine identification and traceability is not fit for purpose.

Although EU legislation requires all kept equids to be permanently identified, recorded in national databases, and accompanied by valid documentation when moving across borders, the system is vulnerable to error and fraud. Many equids remain unidentified or misidentified, movement data is incomplete, and the current paper-based system is easily manipulated. These challenges weaken trust in the system and undermine the functioning of the internal market. An uptake of fully digital, harmonised and updated identification and traceability system is essential to safeguarding equine welfare, strengthening biosecurity and food safety, disrupting the illegal trade.

Many equids remain unidentified or misidentified, movement data is incomplete, and the current paper-based system is easily manipulated.

01.

INTRODUCTION

1.1. Background

Over a decade since the 2013 **horsemeat scandal** (European Commission, 2014), the EU's equine traceability framework remains fundamentally flawed. Despite subsequent regulatory updates, the system remains vulnerable to exploitation, as demonstrated by the 2022 Europol dismantling of a cross-border criminal network (Spanish Ministry of the Interior, 2022) or illegal horse export and slaughter practices in Ireland (RTÉ Investigates, 2024). The latter led to a national action plan focused on digitalising traceability, tightening inspections at assembly centers and introducing stricter penalties for non-compliance (Wall, 2025).

These examples, however, reflect systemic gaps found across the entire EU. The evidence from 14 other EU Member States (Eurogroup for Animals, 2025) confirms that traceability remains a critical vulnerability. **Without a robust identification system, the EU cannot effectively protect animal welfare, ensure food safety, or combat the organised crime currently profiting from these legislative loopholes.**

The EU's equine traceability framework remains fundamentally flawed

The equine sector faces structural vulnerabilities similar to those recently addressed in the EU's Regulation on the welfare of cats and dogs and their traceability (European Commission, 2026). The Regulation acknowledges the threats to animal welfare and public health, as well as the economic harm caused by fraud, unfair competition, tax evasion and undisclosed revenues. This follows recognition by EU institutions of persistent fraud in the trade of cats and dogs, driven by easily falsified documents and undeclared sales (European Commission, 2023). Comparable actions are needed in the equine sector.

This report examines equine identification and traceability across Europe, identifying systemic challenges through diverse case studies, providing an overview of the current landscape and advocating for a holistic reform of legislation, enforcement and compliance to address existing vulnerabilities.

1.2. Why equine identification matters

The purpose of regulating the way Equidae are identified is to ensure that individual equids remain traceable across borders and throughout their lives. In theory, once a transponder has been implanted into an equid, a single lifetime identification document (passport) has been issued, and the details have been recorded in a digital database, the identity of that horse should be verifiable any time and place by scanning the transponder and comparing the number to the information in the passport and the database.

Robust traceability is only possible with reliable identification. Without being able to ascertain an equid's identity, competent authorities cannot trace their movements, know which borders they have crossed, which vehicles they have been on, which diseases and medications they have been exposed to, or who the previous and current owners are. Being able to reliably identify an equid is therefore a prerequisite for protecting their welfare, ensuring food safety and biosecurity, protecting the public against mis-selling and theft, levying appropriate fees and taxes, and combating organised crime.

Equine identification matters for:

- → **Biosecurity:** trace individual horses in the event of a disease outbreak to limit the spread, including of notifiable diseases
- → **Combating fraud and smuggling:** horses are mis-identified and smuggled across borders, sometimes as part of organised criminal enterprise
- → **Food safety:** ensure that only horses with a known identity and medical history are slaughtered for human consumption
- → **Equine welfare:** correctly identify owners, keepers and others involved in the care of a horse to enforce welfare legislation
- → **Owner protection:** make sure sellers disclose the correct history of a horse they are selling; track down stolen horses so they can be returned to their owners
- → **Fees and taxes:** correctly disclose origin and destination of horses crossing borders; identify changes in ownership

1.3. EU legislation governing equine identification and traceability[1]

The legal framework governing equine identification and traceability in the EU is built around Regulation (EU) 2016/429, the Animal Health Law, which established the principle that all equids[2] born in, or imported into, the EU must possess a unique identity linked to both a physical identifier and an official identification document.

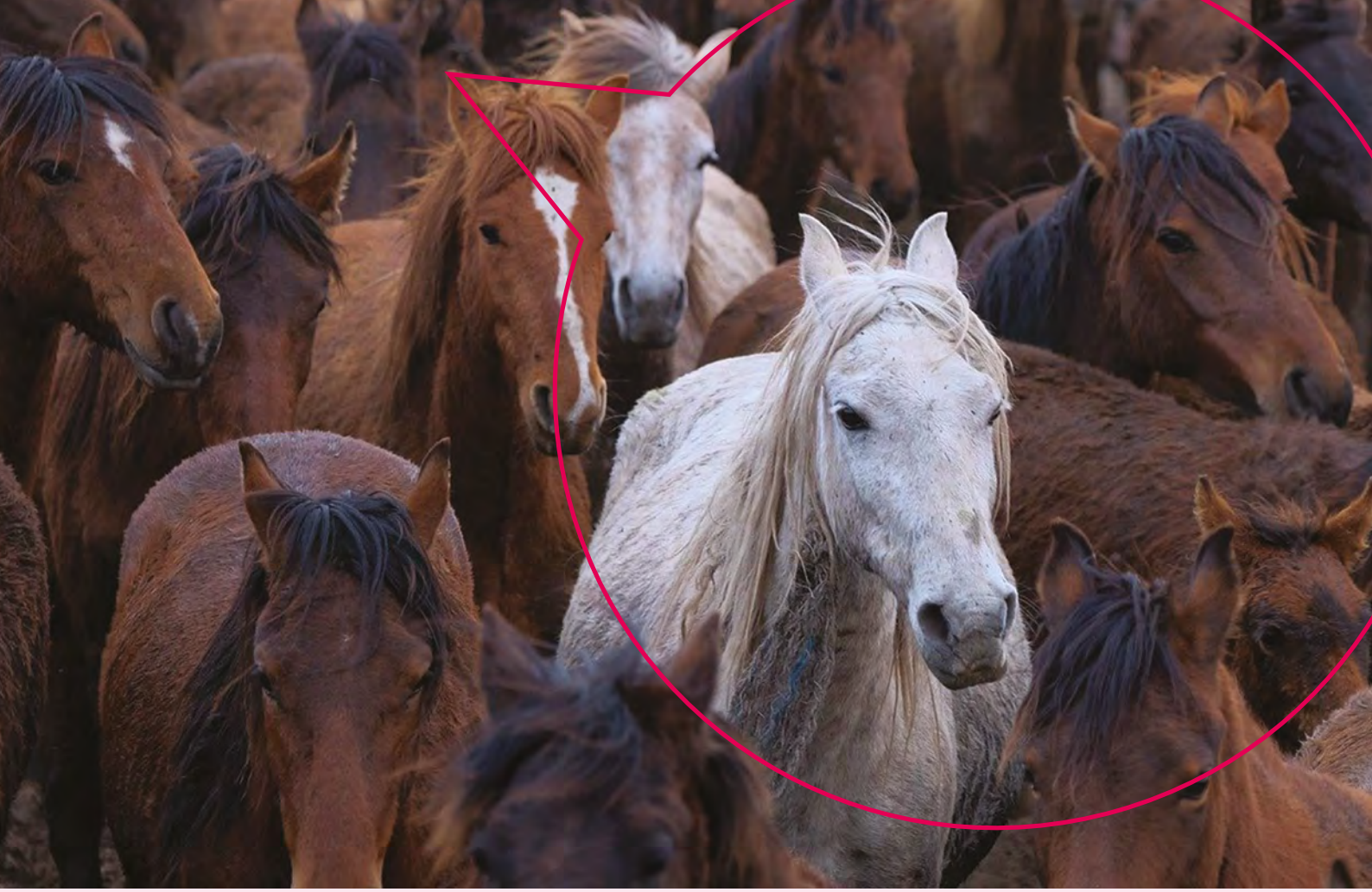
In theory, from birth, a horse enters a regulated traceability system. Under the Equine Passport Regulation, Commission Implementing Regulation (EU) 2015/262, horses born within the EU must generally be identified within twelve months of birth, or before leaving their holding of birth if earlier. Equids imported into the EU must be identified within thirty days of entry. Identification usually consists of an implantable electronic transponder inserted into the horse's neck and an equine passport carrying the animal's unique identification number. Member States may, however, authorise alternative methods or derogations.

Identification is supported by a broader digital traceability regime. The Animal Health Law requires Member States to maintain databases recording both the identity of equids and the establishments where they are habitually kept. Commission Delegated Regulation 2019/2035 further defines a horse's "habitual residence" as premises where it remains for more than thirty days, or ninety days for purposes such as breeding, training or competition. The Regulation also places responsibility on operators to ensure animals are identified correctly and on time, while imposing record-keeping obligations on operators and transporters. Procedures for issuing duplicate or replacement passports are also established.

When horses move between Member States, traceability becomes central to disease control. Commission Delegated Regulation 2020/688 requires equids travelling within the EU to be accompanied by official health certificates, generally issued within forty-eight hours before departure. Certain derogations are permitted though.

The framework is completed by Commission Implementing Regulation (EU) 2021/963, which standardises identification documents across the Union, and Council Regulation (EC) No 1/2005, which requires transported animals to travel with documentation recording their identity, origin, destination and journey details. Together, these measures create a legal system that is supposed to ensure equine identification, movement control and traceability throughout the EU.

1. For details of the relevant Articles in each Regulation that apply specifically to the identification and traceability of Equidae, please see Appendix I.
2. Throughout the report, the terms 'equid' and 'Equidae' are used to denote any animals that belong to the genus Equus and are kept by people. If a section relates to wild Equidae, this will be specified. If a section relates to a specific species, such as horse or donkey, or to a hybrid, such as mules or hinnies, then this will also be specified.



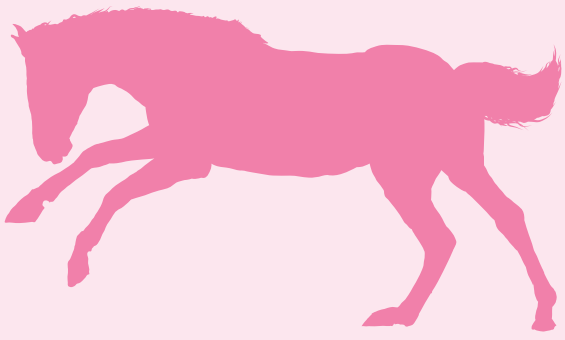
Steps of identification

1. Foal is born
2. Breeder contacts vet who implants transponder before the animal is 12 months old
3. Breeder applies to register horse with Passport Issuing Organisation to receive passport
4. Horse's details are uploaded to national digital database

Steps of travelling

1. Buyer buys foal from breeder
2. The Official Veterinarian issues a health certificate including details of place of origin, date and time of departure, destination, countries they will pass through and duration of journey
3. Passport Issuing Organisation should be notified of change in ownership, if applicable
4. Foal arrives at new premises and the digital database is updated with a new permanent place of keeping

Being able to reliably identify an equid is a prerequisite for protecting their welfare



02.

TRACEABILITY LANDSCAPE TODAY

2.1. The changing roles

Today, Equidae in the EU are broadly divided into four main categories:

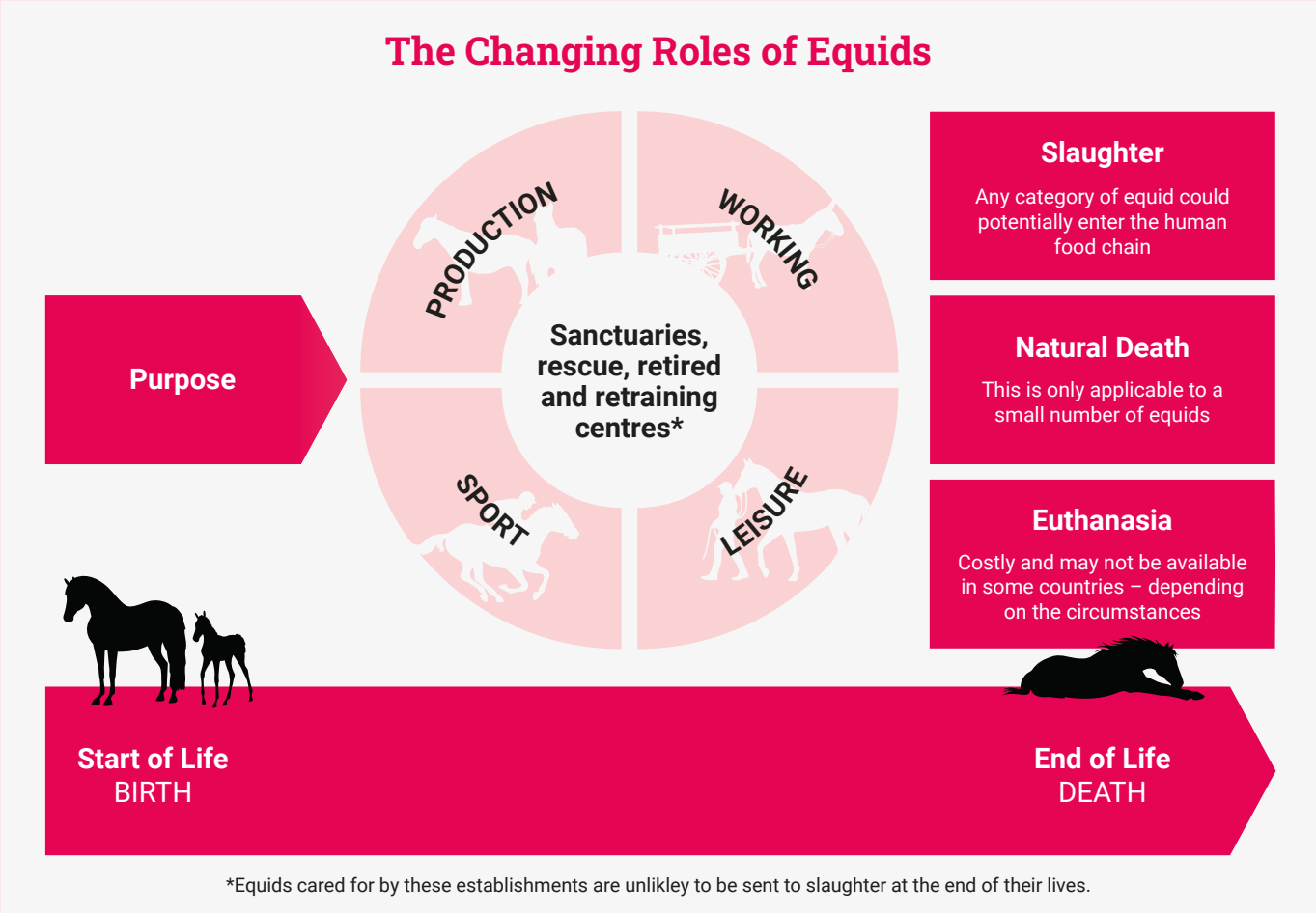
- **Kept equids** which are required by law to be identified with a unique and permanent method of identification and recorded in a national database.
- **Registered equids**, which are kept horses that are additionally registered with either a studbook or an international organisation for the purpose of competition or racing.
- **Unregulated equids**[3], which are equids that are kept by humans and therefore subject to identification and traceability legislation, but which have not been appropriately identified and recorded and are thus outside the identification and traceability system.
- **Wild and semi-feral equids** that do not need to be identified and recorded and which are thus not part of the identification and traceability system.

While each category has its own specific challenges when it comes to ensuring welfare and biosecurity, there is significant overlap between these equid populations due to the increased mobility and changing roles of equids in modern societies (Eurogroup for Animals, 2024). Equids move across borders both within and outside the EU for a variety of reasons including competitions, breeding, selling, rescue and rehoming, moving with their owners, for slaughter and as part of the horse smuggling trade. Some equids may cross borders or change owners multiple times in their life.

Additionally, equids may change roles and status shifting from semi-feral to kept and from unregistered to registered, and vice versa. While Regulation (EU) 2016/429 ('Animal Health Law') and Commission Delegated Regulation 2019/2035 provide formal definitions for these categories, in practice, an individual equid may be used for work, leisure, competition, breeding and slaughter over the course of their life, sometimes across multiple countries.

This fluidity poses a challenge to traceability. A robust identification and traceability system therefore needs to take a comprehensive and consolidated approach that captures all equids, regardless of their status or use.

[3] While the other three categories have corresponding legal definitions in Regulation (EU) 2016/429 and Commission Delegated Regulation 2019/2035 (see section 1.2), 'unregulated equids' are defined in this report as those that should be identified but are not.



The changing roles of equids. *Based on Eurogroup for Animals White Paper 'Good welfare for equids', pp. 21.*

2.2. Increased mobility

The modern equine trade is a highly internationalised phenomenon, characterised by frequent changes in ownership and cross-border movements. Facilitated by online advertisements and specialist dealers, horses are often sold unseen to international buyers. Some dealers may even offer generous return policies in case the buyers are dissatisfied with the animal they receive, meaning equids may end up travelling back and forth across multiple borders in a short space of time (Larssen, 2024) (see Case Study[4] 1).

CASE STUDY 1: This is not my horse

In 2021, an Irish dealer exported a shipment of horses to Sweden. On arrival at one of the yards, the buyer pointed out that the unloaded horse was not the same horse they had bought online. The dealer promptly loaded the horse back onto the lorry and promised to deliver the correct one with the next shipment.

Source: Larssen

[4] The case studies are based on first-hand evidence submitted by Eurogroup for Animals' members. Where required, the names of sources have been withheld for the sake of anonymity.

Equine trade operates as high-risk hubs where equids from various regions are rapidly assembled and redistributed. While many market organisers take measures to ensure that equids that arrive at their venues are correctly identified and recorded upon arrival, unidentified or incorrectly identified equids can slip through the controls (see Case Study 2). This is particularly a risk at street markets with multiple points of entry and exit. The presence of non-compliant animals compromises the biosecurity of all equids at that location, and beyond.

CASE STUDY 2: Unidentified Dutch-Romanian horse

In 2023, a horse without a detectable transponder was allowed onto the premises of a Dutch market. The horse had allegedly travelled from Romania that same night along with another horse, who had a detectable transponder.

Source: World Horse Welfare

2.3. Data mismatch

It is difficult to estimate the scope of equid mobility, as there are no accurate figures for the number of Equidae residing in or being transported around the EU every year. According to the estimates, **there are around six million equines in the EU** (European Commission). However, given the lack of regular and comprehensive national equine censuses in many Member States and the fact that many equids remain unidentified and unrecorded, this figure is unreliable. In fact, different national databases in the same Member State can provide different figures (see Case Study 3).

CASE STUDY 3: Data discrepancies in Romania

In Romania, three separate official databases record the number of equids in the country. The large discrepancies between them highlight the uncertainty around official figures.

- → The National Institute of Statistics (2022): **406,702 equids**
- → The National Sanitary Veterinary and Food Safety Authority (2022): **224,377 equids***

  *this does not include horses younger than 12 months
- → The National Authority for Zootechnics (2023): **525,477 equids**

There is further uncertainty around the number of equids being moved across Member State borders. According to the TRACES annual report for 2024, c. **103,000 intra-EU trade certificates** were issued for horses that year, including for animals being exported to a third country but transiting through Member States, comprising 13% of all intra-EU certificates (European Commission, 2025).

In addition, **2285 Animal Journey Logs** were issued for unregistered horses travelling on journeys longer than eight hours. These figures can only provide an estimate of the true number of equids that were moved across Member State borders. Some certificates will have been issued for consignments of multiple horses, while others may have been issued to the same horses for multiple journeys, and no figures are available for other equid species or hybrids.

Furthermore, the TRACES system does not capture undeclared movements and official figures therefore likely underestimate the actual number of Equidae moved across borders. Eurostat figures, on the other hand, show that **over 440,000 equids moved across Member State borders in 2024** (Eurostat 2016-2024). They demonstrate as well that Ireland exported approximately 320,000 equids to other Member States in 2024, which is almost three times the total number of horses residing in the country that year (DAFM, 2025a). These contradictory figures highlight how inadequate official statistics are at the moment.

This was recently demonstrated in the United Kingdom (UK), where government figures consistently underestimate the number of horses that enter or leave Britain from or to the EU. For example, for 2023, **official figures show 411 horses having entered through the port of Holyhead** the first half of the year (UK Parliament, 2023). In contrast, conservative estimates based on first-hand observations at the ports indicate that t**he true number may be closer to 19,000 equids per year** (World Horse Welfare).

Similarly, the official figures for 2022 show **zero horses entering through the port of Birkenhead** (UK Parliament, 2023), while estimates for the same port put **the actual number at closer to 3,000** (World Horse Welfare). In total, the estimates indicate that at least 90,000 horses pass through British ports every year (World Horse Welfare). This is comparable to the total number of equids moving around the EU based on the TRACES annual report. While the UK certainly sees a large volume of horses entering, exiting and transiting between Ireland and mainland Europe, it is unlikely that the number of equids crossing just the UK border would be comparable to the number of equids crossing all Member State borders combined. As the UK broadly relies on similar identification and traceability measures as the EU, this highlights the extent to which the current systems fail to accurately capture and record equine movements.

2.4. Forgotten donkeys and mules

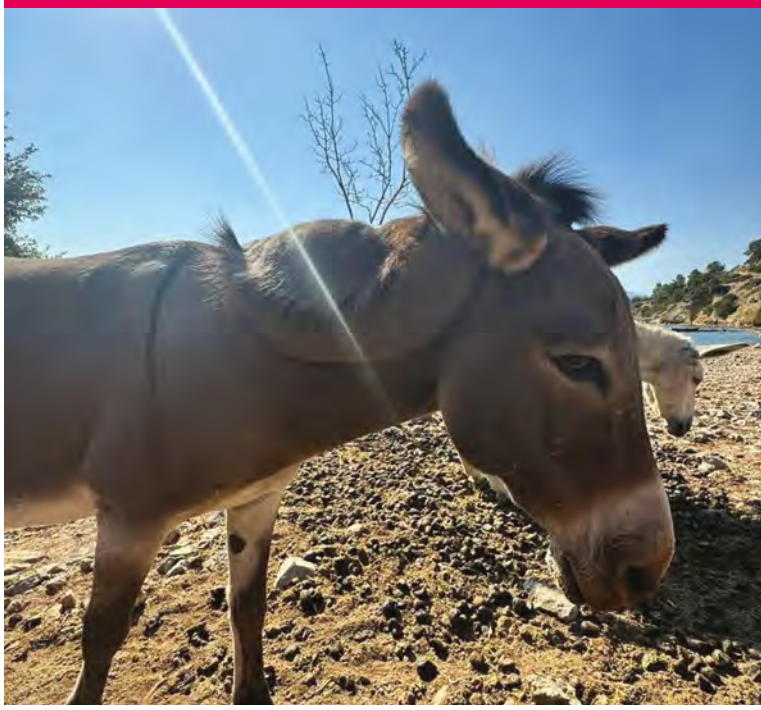
Veterinary practitioners and equine welfare organisations in selected Member States highlight the discrepancy between identification uptakes for horses on the one hand, and donkeys and mules on the other.

This means that official figures for the latter are even less reliable. One reason why donkeys and mules are less likely to be correctly identified is the fact that they are commonly used as working equids in rural areas, where gaining access to veterinary support including identification can be more difficult. In some Member States such as Romania, donkeys and mules that are used in the transhumance sheep management system may spend a significant portion of the year in remote parts of the country. Veterinary professionals also report that there is a conviction among donkey and mule owners that identification is not as important or relevant (see Case Study 4).

CASE STUDY 4: The donkeys of Dokos

In 2024, an equine welfare charity discovered that working donkeys on the Greek island of Dokos were kept in poor conditions and were in poor health. A veterinary inspection found that none of the donkeys were identified. As of 2026, the donkeys remain unidentified and unrecorded.

Source: Ippothesis



2.5. No level playing field across Member States

There is a lack of harmonisation between Member States in terms of how the regulations that govern equine identification and traceability are interpreted and the extent to which they are implemented.

While some Member States have fully implemented all regulations, others have not. This creates confusion among owners, operators and officials when equids are moved between Member States, which risks leading to inadvertent non-compliance. At critical control points such as markets, auctions and border crossings, this confusion can compromise traceability and contribute to criminal networks operating with impunity.

Today, there are many organisations, associations and competent authorities responsible to issue equine passports across the EU. While regulations detail which information needs to be contained in a compliant passport, the designs and layouts can vary substantially, making it difficult for a person unfamiliar with a particular passport design to quickly scan the information and notice if something vital is missing, inaccurate or out of place.

Additionally, **while all Passport Issuing Organisations (PIO) or authorities are required to keep up-to-date digital records of all registered equids, these internal databases are not consistently synchronised with, or accessible through, a centralised public-facing national registry. This makes it difficult for operators or enforcement authorities to verify the identity and history of a horse in real time,** for example at a competition, a market or a Border Control Post (BCP).

It is difficult to estimate the scope of equid mobility, as there are no accurate figures for the number of Equidae residing in or being transported around the EU every year.

A person can scan the transponder in the neck and check that it matches the accompanying unharmonised paper passport, but if there are concerns regarding the veracity of the details, **it can take up to weeks to contact the relevant body to verify the information.**

Additionally, officials who are not familiar with the documentation required to transport equids may not be able to establish when an equid is being transported on incorrect or incomplete paperwork without conducting **time-consuming research.**

Once a horse has been imported into another country, the owner is required to notify a PIO or authority in the horse's new country of residence. The organisation will record the horse's details in their database and overstamp the passport. This adds another layer of potential confusion and bureaucracy when trying to trace the history of a horse that has moved several times in their life through the paper-based system. Moreover, the various derogation options mean that the regulations are implemented inconsistently across Member States and for different categories of equids, such as registered and unregistered.

The significant lack of regulatory harmonisation, comparing key metrics such as the number of issuing bodies and the frequency of data collection, reveals a fragmented administrative landscape that complicates effective traceability and cross-border biosecurity management.

COUNTRY	NO. OF PASSPORT ISSUING ORGANISATIONS	NO. OF DEROGATION AGREEMENTS	LAST EQUINE CENSUS	NO. OF NOTIFIABLE EQUINE DISEASES
Ireland	8	1 (France)	2024-2025	6-13
Greece	3	0	2004	9
Sweden	18	3 (Denmark, Norway, Finland)	2016	26
United Kingdom	~80	0 (post Brexit)	NA	11

Governance of equine identification and traceability. *Source: Eurogroup for Animals' member organisations and official sources*

2.5.1. The EU-UK relationship

While no longer a Member State, the UK remains an important trading partner of the EU and a significant exporter and importer of equids. Many equids are based in the UK but travel to the Republic of Ireland and mainland Europe regularly for breeding and competitions, and vice versa. In particular, the relationship between the Republic of Ireland, Northern Ireland and Great Britain affects European traceability efforts.

Following the post-Brexit agreements between the EU and the UK captured in the Northern Ireland Protocol and Windsor Framework, **equids can move freely between the Republic of Ireland and Northern Ireland, and from Northern Ireland to Great Britain, without needing health certificates or export papers.** In practice, this means that there is limited demarcation between the EU and the UK with potential risks to fraud.

2.6. Health certificate gaps as a biosecurity risk

According to Regulation (EU) 2016/429 (the 'Animal Health Law') and Commission Delegated Regulation 2020/688, all equine movements across Member State borders must be accompanied by an official health certificate except in certain derogated cases. These health certificates are the cornerstone of the traceability system and an integral part of disease prevention and control, as they detail the identity of the equid, the vehicles they were on, their point of origin and destination, as well as any countries they transit through.

Equids that travel without health certificates, or with incorrect health certificates, are essentially untraceable. In the event of a disease outbreak, this lack of documentation renders epidemiological tracking nearly impossible, severely hindering the ability of competent authorities to implement effective containment measures and prevent further transmission. There have been several documented cases where equids, including horses competing at high levels, have been transported without correct health certificates, including when transiting through the UK (World Horse Welfare). In 2021, this practice led to the spread of Equine Herpesvirus-1 around mainland Europe (see Case Study 5).

Lack of appropriate health certification has also implications for human health and food security. A recent study investigated TRACES compliance for equids transported to slaughter and found that more than half of the consignments had incorrectly filled out health certificates that were not compliant with legislation, despite having been signed off by an Official Veterinarian (Padalino et al., 2025).

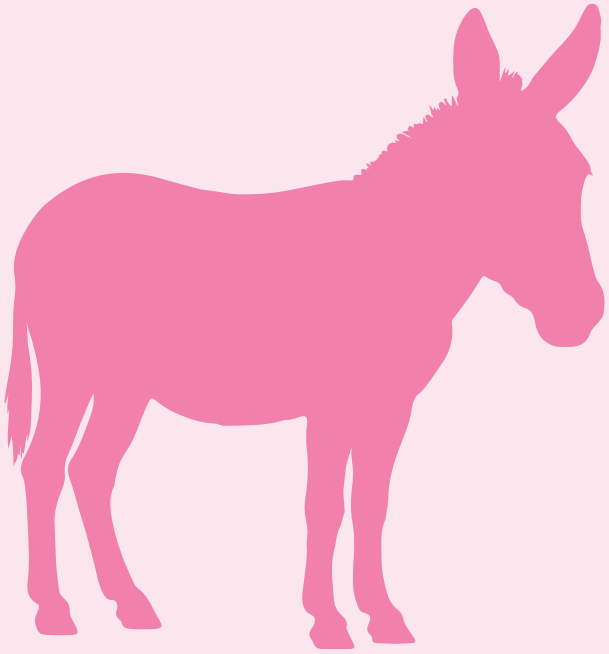
CASE STUDY 5: The Spanish Equine Herpesvirus-1 outbreak

In 2021, Europe experienced an outbreak of Equine Herpesvirus-1. The disease originated at a competition venue in Spain and spread around mainland Europe via horses returning home from the competition. An official inquiry concluded that the fact that many horses left the grounds without appropriate health certificates contributed to the rapid spread of the disease, as it made the task of tracing infected horses more difficult. In total, 18 horses died, and the disease spread to 10 countries before it was contained.

Source: FEI (2022)

Article 76 of Commission Delegated Regulation 2020/688 states that health certificates should, as a rule, be issued to individual equids to ensure individual traceability. In cases where the animals are habitually kept at the same premises prior to departure and departing in the same vehicle, without passing through an assembly point, a health certificate may be issued for the whole consignment rather than for every individual.

In these cases, the individual animals will not be fully traceable. While this weakens disease prevention and control measures, equids that live together without coming in contact with other equids will generally share the same health status and can therefore in practice be treated as a semi-contained population for biosecurity purposes.



However, there are documented cases where these conditions are disregarded. **Dealers who source equids from multiple locations in one country and export them to dealers in another country may apply for consignment-based health certificates to cut costs.** In these cases, the equids are collected from different locations and brought to a holding yard before departure. The health certificates are issued for the whole consignment departing the holding yard, which acts as an undeclared assembly point, meaning that the actual points of origin and destination for each equid remain unknown (see Case Study 6).

CASE STUDY 6: The case of the Trafficked 20

In 2024, authorities in the UK intercepted a transporter at the port of Dover carrying 24 horses from Northern Ireland to mainland Europe on three intra-EU health certificates. The shipment, which consisted of a mix of horses including Irish Thoroughbreds, young foals, ponies and draft horses, was intercepted due to welfare concerns. Upon further inspection, additional irregularities were discovered. The shipment had not been declared as transiting through a third country. Only 20 horses were found on the vehicle and the whereabouts of the four missing horses remains unknown. Several horses were in poor health conditions and a veterinary check confirmed that six carried the highly contagious disease – strangles.

Further controls revealed that the place of departure for the shipment was an assembly point to which the horses had likely been transported from their true points of origin immediately prior to departure, and the destinations were well-known dealer yards which the horses would likely have moved on from shortly after arrival. The true origins and destinations of the horses were therefore hidden, making them untraceable. At least four of the horses on the shipment had been picked up by the same transporter in the UK two days earlier but were declared on the intra-EU health certificate as originating from Northern Ireland.

The fact that some of the horses carried strangles highlights how lack of individual traceability jeopardises biosecurity. Had the horses been allowed to reach the dealer yards and then travelled on to their final destinations, there would have been an uncontrolled spread of the disease to other equine populations around Europe with no way to trace or contain it. Additionally, there were uncertainties about the identity of several of the horses on the shipment, as some had been implanted with multiple transponders while others had further inconsistencies in their passports.

Source: World Horse Welfare (2025)

2.7. Equids of multiple identities

Even when the formal requirements for identification as laid out in Regulation (EU) 2016/429 (the 'Animal Health Law'), Commission Delegated Regulation 2019/2035, Commission Implementing Regulation (EU) 2015/262 (the 'Equine Passport Regulation') and Commission Implementing Regulation (EU) 2021/963 are met, the system remains vulnerable to error, inaccuracies and fraud.

Today, all kept equids in the EU are required to be permanently identified, usually with an injectable transponder, and issued a single identification document (passport) with a Unique Equine Life Number (UELN) by the time they are 12 months old. The transponder number and the UELN are meant to be unique to that individual and connected to each other so that, in theory, every equid has two unique verifications of the same identity that follow that individual throughout their life. The passport is further meant to record any significant changes in the equid's status, such as changes of ownership, vaccinations, administration of certain medicines and changes in food chain status.

Unfortunately, this system is not reliably upheld. In some cases, **equids are not identified within the mandated 12-month window but only implanted with a transponder and issued a passport application document when a sale or a movement across borders requires it** (World Horse Welfare). In other cases, equids may have **multiple transponders implanted, each one connected to a different identity.** This may be done out of error, when the transponder has migrated to a different location in the neck and the person responsible mistakenly believes the equid does not have one and therefore organises to have a new one implanted. Occasionally, however, it is done deliberately to hide the true identity of an equid.

The RTÉ Investigates (2024) highlights a case where an Irish dealer deliberately had a horse re-identified with a new transponder and passport and sold to an unsuspecting buyer in Sweden. **There are documented cases where an equid has been found to have several transponders, each connected to a different identity** (see Case Study 7). In one case, a young horse exported from Ireland to Germany had four transponders in the neck, one of which was allegedly a dog transponder, neither of which was recorded in the accompanying passport.

CASE STUDY 7: The double-identity pony

Amy, also known as Tina, was rescued from a large shipment of horses headed from Northern Ireland to mainland Europe via Great Britain on incorrect paperwork in 2024 (see Case Study 6). It was discovered that she had two transponders in her neck, each one connected to a different identity. A transponder in her nuchal ligament belonged to Tina, a bay mare born in 2013. Another transponder in her lower neck belonged to Amy, a mare born in 2016. She was accompanied by a replacement passport connected to the second identity Amy, which had been issued less than a month before she was exported from Northern Ireland to mainland Europe.

Source: World Horse Welfare

2.8. Organised crime networks

A particular subset of non-compliant equid movements is the illegal trade in equids, often referred to as 'horse smuggling', defined here as any illicit movement of equids, usually across borders and in poor welfare conditions, for some type of monetary gain, where the true purpose and/or identity of the equids is hidden. It is perpetrated by a complex international network with different levels of involvement who exploit the weaknesses of the current identification and traceability system.

Smuggling operations can involve individuals and locations in multiple Member States and even in non-EU countries, including breeders, dealers, transporters and veterinarians. There are smuggling routes and nodes across the EU along which equids are transported and re-identified, and which form the logistical backbone of the illegal trade.

The Illegal trade of horses constitutes a serious, cross-border and organised criminal activity and should be explicitly recognised as organised crime. This activity meets all criteria of Article 83 TFEU: it is financially motivated, involves structured networks of buyers, transporters, document forgers and end-market operators, and exploits regulatory gaps across Member States. The trade frequently includes falsification of passports and microchips, illegal transport and sale under fraudulent documentation. **These practices not only threaten animal welfare and public health, but also distort the internal market and undermine enforcement credibility.**

There are many similarities between European horse smuggling and the illegal trade and slaughter of horses in South America (see Case Studies 8, 9 and 10). In both cases, operations are run by complex and diverse networks who exploit loopholes in the system to make a profit, capitalising on cross border discrepancies to procure low cost equines in one country and facilitate their illegal import into another for the purpose of slaughter.

CASE STUDY 8: Operation 'Yucatan' in Europe

In 2022, a joint operation between the Spanish Civil Guard and Europol uncovered a criminal network engaged in illegal smuggling of horses to slaughter in Spain, Italy, Belgium and the Netherlands. The horses were issued with false identification documents and subjected to poor welfare conditions. The network encompassed a diverse group of individuals with different roles, including operators of premises and slaughterhouses, veterinarians, transporters and butchers, who were aware of the illegality of the trade. In total, 159 horses were seized, and 12 persons were arrested.

Source: Spanish Ministry of the Interior (2022)

CASE STUDY 9: Operation 'Alien Horse' in Uruguay In 2021

An investigation by the authorities in Uruguay uncovered a large-scale smuggling operation that had illegally imported between 1,500-2,000 horses from Brazil to Uruguay. Smuggling horses from Brazil to Uruguay is very profitable, as they can be sold at auction for nearly twice what they cost in Brazil. Upon arrival in Uruguay, the unidentified and untraceable horses were re-branded and sold at auctions, mainly to slaughter. An estimated 90% of the horses ended up in EU-approved slaughterhouses, and their meat may have ended up on the European market. Five persons were arrested as a result of the operation (El Observador, 2021).

Source: Tierschutzbund Zürich (2023)

CASE STUDY 10: The Ibicuy illegal slaughter network

In 2022, Argentinian authorities uncovered a criminal network engaged in the illegal slaughter of unidentified equids. Raids on an assembly centre in Ibicuy and an EU-approved slaughterhouse in Mercedes led to the confiscation of 144 horses in poor welfare states as well as weapons, ammunition and cash. Six people were arrested, including an official veterinarian, and the main dealer in charge was in addition to cruelty to animals also prosecuted for forgery, bribery, tax evasion and money laundering (Argentinian Public Prosecutor 's Office, 2022).

Source: Tierschutzbund Zürich (2023)

Any equid can be smuggled, regardless of breed, age, background or perceived value. This includes perceived high-value horses such as racehorses and sport horses, further highlighting how equids can change status and roles over the course of their lives. The purpose of the movement and the identity of the smuggled equids is often hidden through the deliberate implantation of multiple transponders, falsified identification documents and incomplete paperwork. **Equids are smuggled for a variety of reasons including illegal slaughter, either directly or for fattening, deliberate mis-selling, tax evasion, insurance fraud, or as a cover for other illegal activities. In some cases, equids may be utilised as a front for the smuggling of other goods.**

The modes of operation vary. Sometimes, a smuggled shipment will include equids going to different destinations. Some equids may be intended for immediate slaughter, others for fattening while others will be sold on to unsuspecting buyers in a third country. Additionally, it is common to transport smuggled equids in the same consignments as equids being moved for legitimate purposes to give the movement legitimacy if the transporter is subject to an inspection by the authorities. Sometimes, a transporter may declare as empty even though there are equids on board.

There is overlap between smuggling and legitimate equid movements, and key actors within the smuggling networks may operate genuine equestrian transport and sales businesses as well. These smoke-and-mirrors tactics serve to obfuscate the true origin and destination of the equids, ensuring that the trade can continue unseen and uninterrupted.

The consequences of smuggling in trade are serious. It **undermines legitimate equine trade, presents a serious risk to the health of other equids, and jeopardises equine welfare and human food security.** Equids that fall victim to the trade can be re-identified with new transponders and issued fraudulent passports to hide their true identities, sometimes on multiple occasions, making them essentially untraceable.

This poses a risk to the health and safety of the public, as equids that are not fit for human consumption may enter the food chain under false identity. Many smuggled equids carry transmittable diseases such as strangles or influenza and pose a biosecurity hazard at any premises they may enter. Sometimes, equids that have been sent to slaughter for health reasons may be re-identified and sold on to private owners for leisure and competition without disclosing their background.

Any equid can be smuggled, regardless of breed, age, background or perceived value.

03.

TOWARDS MODERN IDENTIFICATION AND TRACEABILITY SYSTEM

The current equine identification system is not fit for the modern world.

Equids can change roles, status, owners and countries multiple times over the course of their lives. A robust identification and traceability system needs to be designed with this mobility in mind to ensure that every individual horse remains connected to their unique identity and history regardless of their status or country of residence.

3.1. Necessary legislative updates

3.1.1. Amending the 30-day rule

Article 64 of Commission Delegated Regulation 2019/2035 states that all equids are required to be recorded as habitually residing at a premises if they are there for 30 days or longer. This rule does not reflect the increased mobility of modern equids. Today, equids can travel between multiple places and countries within a 30-day time frame, whether for competitions, breeding or sales.

During longer journeys, they may stay at commercial lairages and private yards along the way. These locations are high-risk places for exposure to diseases and pathogens, so having reliable records of where they have been, when and for how long even during shorter journeys and stays is important from a biosecurity perspective to ensure full traceability in the event of a disease outbreak.

Additionally, equids can change hands several times over the course of 30 days if they are sold between dealers bypassing formal registration. **Ideally, any significant change of location, such as travelling to an event, a breeding station or an auction or market, should be recorded. A fully digitalised system would allow such a change to be implemented without increasing the administrative burden on owners, operators, transporters and officials.** Some Member States already implement stricter regulations, such as Spain where all equid movements regardless of purpose need to be approved and recorded by an official veterinarian (Spanish Presidency Ministry, 2011).

CASE STUDY 11: A mule in Spain sold three times

A mule without proper identification was relinquished to a charity in Spain. The animal was identified with a transponder and issued a passport with the charity as the legal owner. They were subsequently placed in a foster home, and the foster home did not take over ownership of the mule. Additionally, an analysis of equid movement records revealed that the mule had since then been sold twice at different markets without any change of ownership registered, and without the official registered owner being notified of their sale and movements.

Source: Barrio, E.

3.1.2. Removing outdated categories

The current system relies on assigning equids to categories such as 'registered', 'unregistered', 'breeding' or 'production'. As this report has demonstrated, equids may repeatedly transition between categories over the course of their lives. A proliferation of categories risks causing confusion around which regulations apply to which equids.

For example, consignments can include both registered and unregistered horses, which in practice means that different rules apply to different horses in the same shipment. Similarly, derogations for some categories but not others risk creating confusion and making both implementation and enforcement of the regulations more difficult.

From a welfare and biosecurity perspective, dividing equids into categories makes little sense as they have the same welfare needs and are equally susceptible to infection regardless of which category they belong to. A single, harmonised set of rules for all equids, regardless of status and role, would streamline the implementation and enforcement of the system.

A digital equine identification and traceability system should centre around a public-facing and searchable EU database

3.1.3. Transitioning to digital

Switching to a fully digital system would solve many of the issues with the paper-based system, such as the diversity of passport designs, risk of fraud, and time-consuming process of verifying information through multiple databases.

A digital equine identification and traceability system should centre around a public-facing and searchable EU database that is fully integrated with the national databases. This approach would harmonise with the Regulation on the welfare of cats and dogs and their traceability (Articles 20 and 26) (European Commission, 2026), which mandates interoperable national databases for identification and registration. By leveraging digital solutions, increasing operational efficiency, more reliable data collection and enhanced regulatory oversight can be achieved. Extending similar obligations to equids would close many of the loopholes that deliberately non-compliant owners, operators, transporters and dealers exploit.

When an equid is first identified and issued with a passport by a competent authority in a Member State, a unique profile should be set up in the database for that individual. The profile should update automatically, with a digital time and location stamp, whenever the equid is entered into a new national database or when information about them is added or altered.

Access to the database should be tiered on a need-to-know basis in accordance with GDPR legislation, so that any member of the public can search for basic information such as the equid's name(s), transponder number(s) and UELN, but not have access to restricted information. Registered owners should have further access to their equids' details, while competent authorities and law enforcement agencies can have full access to facilitate traceability and enforcement with veterinary professionals having access to sufficient information for each entry to identify the responsible person and the horse's food status. Such a digital system should also allow for easy and efficient updates by owners, operators, keepers and transporters, who can digitally enter information about an equid's journeys and premises in real time.

The implementation of this digital system should be accompanied by a legal requirement for owners and operators to update the horse's profile within 48 hours[5] if the equid changes status or passes through key control points. These are locations where they may change owner, role, premises or come into contact with diseases, for example markets, sales, competitions, lairages, dealer yards or when they are transported.

[5] The Regulation on the welfare and traceability of dogs and cats establishes a timeframe of two working days to register a dog or cat after identification within the EU (Article 20), and five working days if the animal is brought into the Union (Art 26.3). Changes of ownership must be recorded within two weeks (Art 20) .

To further streamline the process and secure it against abuse and fraud, a double verification system should be implemented for any changes requiring the approval of two parties. For example, identification details should require approval of both the owner and a veterinarian, changes of ownership should require the approval of both the current owner and the new owner, and changes to an equid's place of residence should require the approval of both the owner and the operator of the premises. This would ensure that no one can alter the status of an equid without the knowledge and approval of the registered owner, while also making sure that an owner cannot add transponder numbers or register the equid at a new premises without the approval of a veterinary professional or the operator of the premises. Such a digital system alongside intelligent microchips offers also direct possibility to monitor the basic health and welfare of the animals (Farm Innovations).

For optimal usability, the digital system should be developed with both website and mobile app interfaces. While digital coverage is generally good in all Member States, including in rural areas, **the paper-based system can remain in place as a complement for those owners who do not have the capacity to transition to a fully digital system.** The database should ideally be integrated with any significant importer and exporter of equids from and to the EU, like the UK. It would be beneficial to liaise with end-users on the development of the database, both in terms of content and technical solutions. The International Equestrian Federation, for example, recently launched a digital passport for equids registered with them as a supplement to their paper passports, with the specific goal of improving their own traceability and biosecurity efforts (Fédération Équestre Internationale, 2025).

The Icelandic digital database

3.1.4. Improving the TRACES interface

Although TRACES enhances traceability and the coordination of controls, significant gaps remain. Within the limits of GDPR, **access to the TRACES system should be extended to all competent authorities, rather than being limited to the countries of origin, transit and destination.** Competent authorities should further be able to search for specific animals by transponder or passport number and clearly be able to identify associated traders, breeders, transporters, consignors or consignees.

To facilitate easy and efficient controls, the search function in the TRACES system should be improved to allow for incomplete searches or searches that do not replicate the exact way data was entered into the system, for example when it comes to vehicle registration numbers. Additionally, the system should be expanded to allow verification of transporter authorisation and ensure vehicle compliance and upgraded to automatically generate information on animals refused entry at borders.

3.2. Removing barriers to compliance

3.2.1. Reducing red tape for the owners

The chief responsibility for keeping an equid's records up to date falls on the owner of the equid and the operator of the premises on which they are habitually kept. Today, there is large variation in the levels of compliance among owners and keepers. While most owners are aware of the need for equids to be identified with transponders and to apply for paper passports, there are significant barriers which prevent them from complying with the requirements.

One such barrier is the administrative effort required to have an equid correctly identified. The current paper-based system can be costly, time-consuming and labour intensive, as the owner needs to organise and pay for both the veterinary visit to implant the transponder as well as the administration required to get the passport issued. Costs vary between Member States and PIO but can range from €10 in Romania, through €60 in Spain, to €200 in Sweden (Lazar, E. Barrio et al., 2025). Some owners and keepers may not see the point of going through the effort of having their equids identified or their premises registered if they are not initially planning on selling or competing with them. For owners and keepers in remote or rural areas, access to veterinary care can be additionally difficult and costly. This has a disproportionate impact on donkeys and mules, as they are more often found in remote areas as working equids. There may also be cultural differences in the level of tolerance of government oversight between countries.

When it comes to movements across borders, it can be difficult for owners to understand what is required of them, particularly when exporting equids. The administrative burden of compliance presents a significant barrier to legal equine movement. In some countries, health certification costs alone can reach approximately €400 per equid, and for those who travel frequently, or travel with multiple equids, the costs can quickly add up (Distriktsveterinärerna, 2026). It is important to acknowledge and address these barriers for owners and operators in order to increase compliance with identification and traceability regulations. **Information campaigns directed at owners and operators can highlight the benefits of timely identification and keeping documents up to date, for example if their animals get stolen or if there is a disease outbreak.**

These campaigns could be coordinated with the wider equine sector to maximise reach and impact. A streamlined, easy-to-use digital system with a one-step submission interface will help minimise the administrative cost and effort involved, making owners more likely to follow through with the procedure.

The chief responsibility for keeping an equid's records up to date falls on the owner of the equid

Nationwide, coordinated identification campaigns, jointly with a national equine census or a disease testing program, can encourage participation among equid owners (see Case Study 12). Such campaigns could make a targeted effort to reach donkey and mule owners and encourage identification of their animals, for example through subsidised identification programs in rural areas combined with national censuses. A set period during which any administrative and other fees are waived can also be a way to increase participation.

CASE STUDY 12: Combining identification with disease testing in Romania

Romania began implementing widespread identification of equids in 2007, in tandem with a country-wide testing program to monitor the prevalence of Equine Infectious Anaemia in the population. Any horse that tested positive was confiscated by the government for euthanasia, and the registered owner was reimbursed for the value of the horse. This created an incentive for horse owners to make sure their horses' paperwork was up to date. Today, there is regional variation in the number of equids identified and registered. While compliance is generally good in the West, where there are mostly horses, it is poorer in the South where there are many donkeys and mules. As these animals are often used by shepherds in remote areas, there is little access to veterinarians who can perform the insertion of the transponder and fill out the necessary paperwork.

Source: Lazar, E., et al. (2025)

3.2.2. Acknowledging the role of veterinary practitioners

Veterinary practitioners have a unique role as the main interface between owners and the system. They are responsible for implementing key elements of equine identification legislation such as implanting transponders, recording and updating information in the passports, verifying identities, issuing health certificates. In many cases, private veterinarians are the only professional persons who will see an individual equid on a regular basis, and they often build a rapport with horse owners and operators in their area. They are uniquely placed to both monitor and encourage compliance among their clients. For this reason, private **veterinarians should be consulted, particularly when it comes to addressing barriers to compliance.**

The Irish Department of Agriculture, Food and the Marine (DAFM, 2025b) report emphasises that increasing legislative compliance requires a simultaneous reduction in the administrative burden for veterinarians as well as owners and operators through digitalisation and standardised protocols.

As a suggested policy change, the Irish government is considering making it a requirement for veterinarians to notify the DAFM when they implant a transponder in a foal, so that any late registrations can be followed up by the Department. This is only considered viable through a digital approach, such as integrating a microchip notification module within the existing National Veterinary Prescription System (NVPS). The Collins report further emphasises the benefits of developing a harmonised process to access transponders and DNA test kits from PIOs as well as harmonised passport designs, to make recording in the field easier.

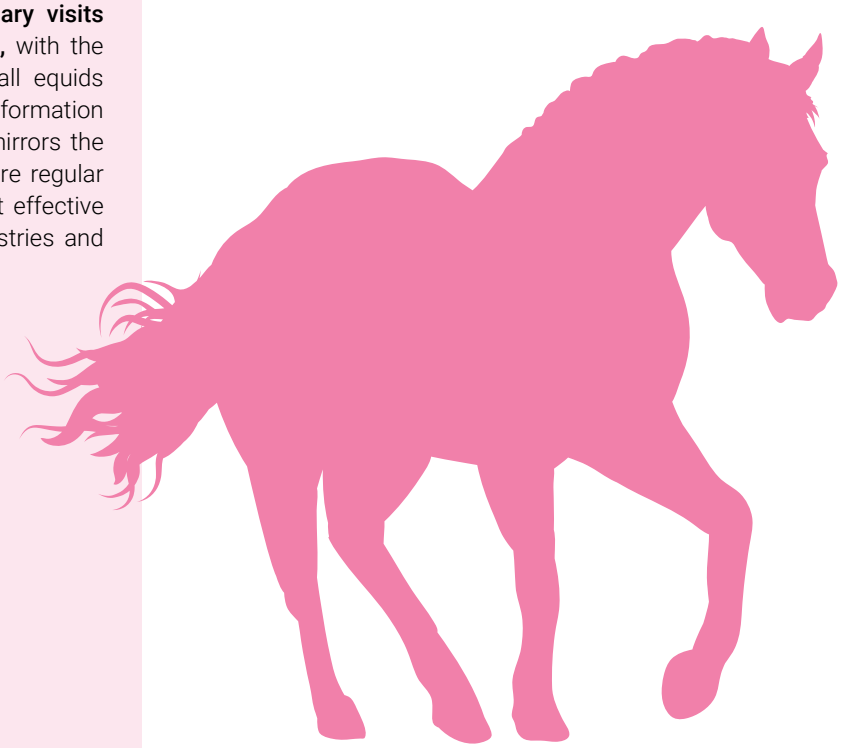
A further suggestion is to make **annual veterinary visits mandatory for all operators of equine premises,** with the objective to verify the number and identity of all equids habitually kept on the premises and to update the information in the central database. This "audit-visit" model mirrors the success of annual disease-testing protocols, where regular professional oversight has proven to be the most effective mechanism for maintaining accurate animal registries and deterring non-compliance.

Veterinary practitioners have a unique role as the main interface between owners and the system

Implementing mandatory annual veterinary audits enables high-integrity enforcement of equine identification across Member States. To ensure feasibility, these audits must be synchronised with routine visits to minimise costs and administrative friction. During these sessions, veterinarians would verify identities by scanning transponders against documentation, utilising digital systems to automatically sync verified data with national databases, thereby transforming routing healthcare into a robust auditing framework. As the primary advisor to equine owners, veterinarians must receive mandatory training on current traceability rules and identification fraud, such as fraudulent passports or duplicate transponders. Member States must support this through continued professional development and established protocols that clearly delineate reporting pathways, ensuring a distinct division of responsibility between field level detection by practitioners and enforcement by government authorities.

3.2.3. Liaising with the wider equine sector

It is vital to balance the importance of robust measures against valid concerns by stakeholders within the equine sector regarding costs, administrative burdens and ease of movement. The European Commission and Member States should liaise with the sector to highlight the importance of robust equine identification and traceability to their interests and operations. Equestrian organisations play a key role in informing their members about national and international regulations and in encouraging behaviour change by enforcing them at venues, events and competitions, so having their support is vital for the implementation and enforcement of any legislation. This approach should subsequently extend to other sectors involving equines.



3.3. Coordinated and effective enforcement

3.3.1. Cooperation between competent authorities and enforcement agencies

Once the legislation has been updated to address modern challenges and efforts are made to remove barriers to compliance among owners and operators, with a digital recording system in place, **it is important to ensure that the rules are effectively enforced.** As horse movements are international, greater national and international cooperation between competent authorities and enforcement agencies in Member States as well as the UK will be key. Interventions should be intelligence-driven rather than comprehensive or random so that they target those in violation of the regulations while allowing ease of operation for those who comply with the law.

A fully digital identification and traceability system will enable efficient checks and allow for precisely such targeted enforcement. **The digital system should be designed to automatically flag inconsistencies or missing details to the relevant authority upon scanning the horse's transponder,** minimising the need for manually going through the paperwork, for example at a BCP.

Non-compliance should be penalised in a proportional and staggered manner, with the severity of the penalty increasing with each consecutive breach. Less serious and occasional non-compliance can be penalised through a fees-based system, which can increase in size for each repeated incident. For serious or repeat offenders, penalty measures should include for example suspensions of licenses.

CASE STUDY 13: A discarded sport horse on a remote hillside

A properly identified horse with a valid passport died from colic and was discarded on a mountainside in Greece. Despite the horse's identity being ascertained by a welfare organisation, the owner faced no consequences.

Source: Ippothesis

3.3.2. Disrupting the illegal horse trade

Criminal networks are exploiting systemic weaknesses, characterised by poor identification compliance and inconsistent enforcement at critical control points, to turn equine smuggling into a lucrative enterprise. Because this illegal trade constitutes serious, organised, cross border criminality that meets the criteria of Article 83 TFEU, it must be explicitly recognised within the EU's rules on organised crime.

Border enforcement officials across Member States and the UK highlight the fact that the lack of established protocols and appropriate facilities to conduct routine inspections of equid consignments at BCPs or along transport routes means that vehicles transporting equids tend to pass under the radar.

Even if they have reason to suspect that a vehicle may be carrying smuggled goods, conducting an inspection with equids onboard is not possible without compromising the safety of the officials, and unloading the equids to perform a full inspection is not feasible without compromising the safety of the horses.

While it may not be possible to fully stop the illegal trade from happening, several of the suggestions outlined in this report such as more appropriate legislation, a digital identification and traceability system, greater compliance among horse owners and keepers, and targeted enforcement interventions will contribute to disrupting it.

To address the specific issue of smuggling, it would be beneficial to see increased cooperation and intelligence-sharing between national and international agencies to bring the issue to the attention of local, national and international authorities and to build a working profile of the networks, routes and methods of operation involved.

Intelligence-led controls targeting persons and movements of interest can help disrupt the trade without being unduly onerous on compliant movements. It is important to note that enforcement should have a wider legal scope than just equine identification and traceability, and consider things such as animal welfare, consumer protection, taxation, and smuggling of other goods.

Finally, it would be beneficial to launch an information campaign to bring the issue to the attention of the public and raise awareness among equid owners and industry stakeholders about the existence and implications of the illegal trade.

04.

POLICY RECOMMENDATIONS

On legislative changes:

- The requirement for equids to be recorded as residing at a premises only if they are there for longer than 30 days should be shortened to reflect the increased mobility of modern equids.
- Equid categories and category-based derogations should be removed and the regulations streamlined to reflect the shifting roles of modern equids.
- A fully digital identification and traceability system which integrates national databases with a central database and allows for tiered access and easy, real-time updates by owners and operators should be developed and implemented.
- Owners and operators should be required to update an equid's digital profile within 48 hours of any significant change in status or if the equid has passed through a key control point such as an auction or market.
- The user interface of the TRACES system should be improved to allow easier and more efficient access to information about an equid or a consignment.

On compliance:

- Educational campaigns can highlight the benefits to owners and operators of ensuring their equids are correctly identified and all paperwork up to date. These should specifically target donkey and mule owners in remote areas to encourage identification of their animals.
- Coordinated national equine identification campaigns can be rolled out in coordination with a national equine census and/or a disease testing program to encourage participation among owners.
- Administrative and other fees can be waived during a set period to encourage identification and application for passports.
- Mandatory annual veterinary visits for all equine premises to audit the number and identity of all equids on site.
- Veterinary professionals should be provided with continued professional development with regards to the implementation of equine identification and traceability regulations and be made aware of common compliance issues.
- Member States should clarify the responsibilities of veterinary professionals with regards to recording and following up on unidentified equids and other non-compliance.
- The European Commission and Member States should hold an open and responsive dialogue with the wider equine sector to highlight the importance of a robust and reliable identification and traceability system and to identify areas of concern.

On enforcement:

- As a serious, cross-border and organised criminal activity, the illegal trade of horses meets the criteria of Article 83 TFEU and should be explicitly recognised under the EU's forthcoming rules on organised crime.
- Member States should facilitate increased cooperation between national competent authorities and enforcement agencies, within the EU and with the UK, to encourage targeted, intelligence-driven interventions against non-compliance.
- Non-compliance should be penalised in a proportional and staggered way, and serious and repeat offenders should for example have their trading or transport licenses suspended.
- Member States should facilitate increased cooperation and intelligence-sharing between national and international agencies to map the smuggling networks and disrupt the trade through targeted controls.
- Information campaigns can help bring the issue to the attention of the wider public, particularly the equine industry and equid owners.

05.

CONCLUSION

Today, many equids remain unidentified for all or part of their lives, while others may have multiple identities. Additionally, modern equids can be highly mobile and change roles, owners and countries of residence several times over the course of their lives.

The lack of robust and reliable identification in combination with the increased mobility of European equids poses specific challenges from a traceability perspective, as the current system does not capture many of these movements. Furthermore, both implementation and enforcement of the relevant Regulations vary across Member States, and the lack of sufficient harmonisation presents a challenge to owners, operators, competent authorities and enforcement agencies when navigating international equid movements.

A particular challenge is the illegal equid trade which is perpetrated by criminal networks who exploit loopholes in the identification and traceability system to profit from selling, transporting and slaughtering untraceable equids. This trade has an international scope and poses a significant risk to biosecurity, food safety and equine welfare. It also undermines the legitimate equid trade by making a profit through tax evasion and by presenting a reputational risk to compliant breeders, dealers, transporters and slaughterhouses.

Whether due to error or deliberate non-compliance, the fact that many equids remain unidentified and untraceable jeopardises the integrity of the entire system, and by extension the ability of competent authorities to enforce welfare, biosecurity, food safety and achieve true Single Market. Transitioning from a paper-based to a fully digital system will be key to enhance both compliance and enforcement.

To address these challenges, **the current identification and traceability system needs to be updated to better reflect the reality on the ground through changes targeting three key areas: legislation, compliance and enforcement.**

APPENDIX I

EU Regulations pertaining to equine identification and traceability

Regulation (EU) 2016/429 (the 'Animal Health Law')

Specifies Member State obligations relevant to the identification and traceability of kept Equidae.

- Article 109 stipulates that relevant information pertaining to each equid should be stored in a digital database by each Member State, along with the location of the establishment where the equids are habitually kept.
- Article 114 stipulates that every equid born in or imported to the European Union needs to be assigned a unique identification number linked to a physical means of identification as well as to a corresponding identification document.
- Article 143 stipulates that any equid moved across Member State borders needs to be accompanied by an official health certificate.

Commission Delegated Regulation 2019/2035

Supplements the Animal Health Law with regards to establishments keeping Equidae and the traceability of certain Equidae.

- Article 2 defines registered Equidae[6] as those that are entered into a studbook or registered with an international organisation for the purpose of competition or racing.
- Article 24 stipulates that operators of establishments keeping Equidae shall keep records of the animals' unique code, date of birth on the establishment and date of death, loss or slaughter on the establishment.
- Article 34 stipulates that registered transporters are to keep records of the licence plate number or registration number, the dates and times of loading at the establishment of origin, the name, address and registration number of each establishment visited, the dates and times of unloading at the establishment of destination, the dates and the places of cleaning, disinfection and disinfestation of the means of transport and the reference numbers of the documents accompanying the equids.
- Article 58 stipulates that operators of kept Equidae are responsible for ensuring that each of their animals is identified with an injectable transponder and a single lifetime identification document within the time frame specified in Article 12 of the Equine Passport Regulation (see below) and for providing their competent authority with the necessary information.
- Articles 59 and 62 authorises Member States to allow alternative methods of identification other than injectable transponders under certain conditions.
- Article 60 authorises Member States to make certain derogations from the identification requirements for equids living under wild or semi-wild conditions in defined populations, if they are not removed from these populations or brought into captivity for domestic use.
- Article 61 authorises competent authorities to issue temporary identification documents to Equidae being transported from their establishment of birth to a slaughterhouse under certain conditions.
- Article 64 details the information that shall be recorded in the digital database by the competent authority about establishments where Equidae are habitually kept and the individual Equidae at these establishments. The regulations do not apply to Equidae kept on the establishment for less than 30 days or for Equidae kept on the establishment for less than 90 days if they are there for breeding or for competitions, races, shows, training or hauling.
- Article 65 details the minimum information that shall be included in the single lifetime identification document.
- Article 66 stipulates that every equid should be accompanied by their single lifetime identification document at all times except under certain circumstances. When an equid dies, their identification document should be returned to the competent authority that issued it.
- Article 67 stipulates that a *duplicate* identification document should be issued to replace a lost document of if the equid was not identified in time, while a *replacement* identification document should be issued to replace a lost document or if either the means of identification or the document has been removed, modified or replaced without permission of the competent authority.

6. The Regulation distinguishes between registered Equidae and those for 'breeding and production', commonly referred to as 'unregistered'.

Commission Delegated Regulation 2020/688

Supplements the Animal Health Law with regards to health requirements for equine movements within the Union.

- Article 69 makes provisions for Member States to authorise equine movements without official health certificates if certain conditions are met and traceability can be guaranteed in other ways.
- Article 76 stipulates that health certificates should be issued for individual Equidae within 48 hours before departure. If the animals are transported together without passing through an assembly point, the health certificate may be issued for the consignment.

Commission Implementing Regulation (EU) 2015/262 (the 'Equine Passport Regulation')

Specifies details about approved methods of identification and registration pursuant to previous Directives.

- Article 5 outlines the bodies approved to issue identification documents for Equidae.
- Article 12 stipulates that all kept Equidae born in the European Union must complete the identification process within 12 months of their date of birth, or before they are permanently moved from the premises where they were born.
- Article 13 authorises Member States to make certain derogations from the identification requirements for equids living under wild or semi-wild conditions in defined populations, if they are not removed from these populations or brought into domestic use.
- Article 15 stipulates that Equidae that are imported to the European Union need to be identified and recorded with a competent authority in accordance with the regulations within 30 days of entry.
- Article 18 specifies that kept Equidae must be identified through a scannable transponder implanted in the neck.
- Article 21 authorises Member States to decide that other forms of physical identity verification are acceptable under certain conditions in lieu of a transponder.
- Annex I describes the contents of the identification document (equine passport).

Commission Implementing Regulation (EU) 2021/963

Outlines the rules for the identification and registration of equine animals and established model identification documents for those animals.

Council Regulation (EC) 1/2005 on the protection of animals during transport

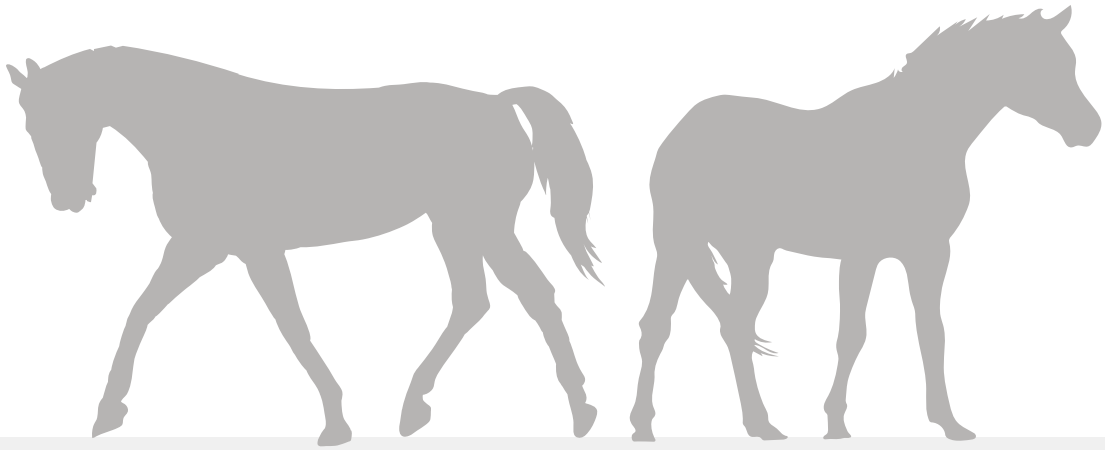
Specifies the documentation that needs to accompany any animal that is transported in the European Union.

- Article 4 stipulates that all animals including Equidae need to be accompanied by details of their identity, ownership, origin, place, date and time of departure, intended destination and expected duration of the journey.

APPENDIX II

Summary of policy recommendations

LEGISLATIVE CHANGES	
Residence status update needed for < 30 days residence	Shorten the 30-day residency threshold to more accurately reflect the high mobility of modern equids
Equid categories removed	Remove equid categories and category-based derogations to reflect shifting roles of modern equids
Full digitalisation	Implement a fully digital, real-time identification and traceability system that integrates national with a central database providing owners and operators with tiered access for easy updates
48 hours deadline for digital profile updates & status changes	Owners and operators should update the equid's digital profile within 48 hours of any status significant change or passage through key control points (e.g: auctions or markets)
Enhancement of TRACES' user interface	Improvement of TRACES' user interface for more efficient access to consignment and individual equid data
COMPLIANCE	
Educational campaigns	Launch of educational campaigns highlighting the benefits of updated identification, targeting donkey/mule owners in remote areas
Incentivised ID campaigns	Launch national ID campaigns in coordination with census and/or disease testing programmes to incentivise owner participation
Waived fees for set periods	Waiving administrative and other fees during a set period to encourage identification and application for passports
Mandatory annual vet visits	Mandate annual vet audits of all equine premises to verify equid numbers and identities
Continued professional development	Provide vets with CPD on ID and traceability regulations and common compliance issues
Stakeholders' dialogue	Maintain an open, responsive dialogue between the European Commission, Member States and the wider equine sector on identification and traceability
ENFORCEMENT	
Illegal trade of horses → Organised crime	Explicit recognition of illegal horse trade as organised crime under Art 83 TFEU
Cross-border cooperation	Facilitate European cross-border cooperation to share intelligence and map/disrupt smuggling networks
Proportional penalties	Apply staggered penalties; suspend trading or transport licenses for serious and repeat offenders
Public awareness campaigns	Launch information campaigns to alert the equine industry and the public to the scale and risks of the illegal horse trade



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An uptake of fully digital, harmonised and updated identification and traceability system is essential to safeguarding equine welfare, strengthening biosecurity and food safety as well as disrupting the illegal trade.

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