Donkey welfare in Ireland 2015: concerns and solutions
An investigation to determine the main drivers for current and potentially future relinquishment (to charities) and abandonment of donkeys on the island of Ireland

Researcher team

Dr Joe Collins MVB PhD CBiol CSci FRSB MRCVS CertEP CertVR, Equine Veterinary Services (Director), Co Cork, lead author.

Dr Vivienne Duggan MVB PhD DipACVIM DipECEIM, University College Dublin (UCD-Veterinary lecturer in equine medicine) and Veterinary Ireland (President 2014).

Ms Sarah Finney BA, UCD (Veterinary undergraduate), Chapter Five.

Professor Patrick Wall MB BCh BAO MBA MVB MRCVS DipECVPH, UCD (Associate professor of public health) and Horse Sport Ireland (Chairman 2013- ).
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Summary

A mixed methods research study was undertaken in 2014/2015 regarding donkeys on the island of Ireland focused on the years 2011 to 2013 inclusively. A quantitative study was first made of available knowledge concerning the breeding, keeping, recording and movement of donkeys with a view to identifying factors relevant to their relinquishment/abandonment and subsequent rescue leading to sanctuary, rehoming or euthanasia. A network of informed, knowledgeable contacts was established and available data was gathered. A sub-project was run during the summer equestrian show season to investigate a particular concern regarding the potential for donkeys to be, or be perceived to be, a risk for the spread of contagious disease. The preceding work informed the construct of a questionnaire focused on three areas, namely breeding/keeping/disposal; Area Aid Schemes; and fostering/rehoming. The themes that emerged from an analysis of the opinions of ‘informed experts’ were then reported. A picture was finally drawn of the key issues regarding donkey welfare in particular as they pertain to abandonment/relinquishment; likely drivers for these problems; and potential practical solutions that might be implemented to improve the lot of donkeys in Ireland in the future.

Background and context

Concern has been expressed that the breeding, keeping and welfare standards generally of donkeys in Ireland are largely unregulated and unstudied processes; this despite a downturn in the country’s economic fortunes, the collapse of donkey sales values (most particularly for colt foals), increasing reports of neglect, the difficulties of fostering, the introduction of robust new animal health/welfare provisions and changes to the operation of the Tripartite Agreement and the EU Disadvantaged Areas Scheme (DAS). To date, donkeys have not attracted the attention given to these processes for horses in Ireland since the demise of the ‘Celtic Tiger’, as evidenced by a recent three year research project funded by World Horse Welfare at the UCD School of Veterinary Medicine: see Challenges and Solutions to support good equine welfare practice in Ireland: http://www.ucd.ie/animalwelfare/research/
This project was developed on an ‘island of Ireland’ basis, comprising 32 counties organised into four provinces: five in Connacht, 12 in Leinster, six in Munster, nine in Ulster. Where otherwise referred to by number throughout this report, 26 counties equals the Republic of Ireland, six counties equals Northern Ireland.

Breeding, keeping, selling and otherwise disposing of donkeys in Ireland: reported in Chapter 2

Available statistics regarding the production, location, sale, abandonment and disposal of donkeys were collated through contact with, and visits to, relevant organisations. Legislation regarding the breeding and keeping of donkeys was studied and is reported here including recent developments regarding central databases, equine holdings registration and the requirements regarding transfer of ownership of equines. Information was gathered about the advertising of donkeys for sale (most particularly via the online platform DoneDeal), which shows a peak in April/May, a preponderance of advertisements from western seaboard counties, relatively few ads originating from Northern Ireland, approximately two thirds of ads studied for single donkeys being for a male donkey and almost half of donkeys being advertised as aged two years or less. The seizure and subsequent fate of impounded donkeys (reclaimed, rehomed or euthanased) by government agencies such as Local Authorities (the 26 counties) and Councils (six counties) is also reported: with the exception of one Local authority it can be seen that almost no seized donkeys were euthanased. This situation contrasts with the position regarding seized horses (of whom approximately three quarters have been humanely destroyed in recent years) and is most likely, the authors suggest, explained by the rehoming arrangements in place between The Donkey Sanctuary and (most) Local Authorities.

Area Aid Schemes and donkey registrations: reported in Chapter 3

A variety of farm subsidy schemes apply to the farming of land in Ireland with variable arable, livestock and environmental focus. In order to claim one such agricultural subsidy known until 2015 as the Disadvantaged Area Scheme (DAS), and subsequently as Areas of Natural Constraint (ANC), farmers have to demonstrate that the land
is being farmed. Donkeys registered in the name of the applicant farmer qualify as ‘Livestock Units’ for the purpose of Stocking Density Calculations and have proven an attractive ‘low-cost’ option in particular in areas with marginal grazing land and where applicants farm on a part-time basis or otherwise value a low-input (in terms of time and costs) model.

The numbers, locations and types of donkeys being officially registered via Horse Passport Issuing Organisations (HPIOs) such as Horse Sport Ireland, Leisure Horse Ireland and the Donkey Breed Society is reported. The numbers of donkeys (and horses) recorded in Stocking Density Calculations for Area Aid Disadvantaged Area Schemes via the Department of Agriculture, Food and the Marine (DAFM) and the value of payments that accrued to those registering equines for such schemes is reported for each of 26 counties for the years 2011, 2012 and 2013. Equines have not been eligible for equivalent agricultural schemes in the six counties of Northern Ireland. Donkey eligibility criteria for Area Aid Schemes in the 26 counties remain unchanged for 2015. There is every expectation however that it will be reviewed for future iterations. According to figures published for 2014, there are over 2,500 donkeys registered as Livestock Units (LUs) on DAS/ANC at a payment value to their keepers (in the 26 counties) of almost €1.6M. The authors believe that the future value (and potentially welfare) of these donkeys will be significantly affected not alone by actual changes to donkey eligibility if/when these occur but also by the uncertainty engendered by the prospect of change. They also believe that the welfare of indiscriminately bred donkeys that might no longer prove eligible for ANC will be under even greater threat than before. The authors urge caution and careful consideration of how donkey eligibility criteria might be adjusted with what potential unintended consequences. Any changes (real or perceived) to donkey eligibility are considered likely to significantly increase the numbers of donkeys offered for disposal and/or relinquishment to local/central authorities and animal welfare charities. These will include adult microchipped donkeys currently registered on Area Aid Schemes and as-of-yet unidentified juveniles (especially uncastrated males) with even lower monetary value than their current low market value.
A core task of animal welfare charities is to respond to notifications of animals in need, and then provide a rescue service and solutions to address the welfare needs of the animals concerned. They differ with respect to their approach to rehabilitation, sanctuary, foster/rehome and euthanasia of donkeys. In Ireland this service is provided on an all-island basis, most notably by The Donkey Sanctuary (TDS). It and other animal sanctuary and/or welfare organisations such as the Irish (and local) Society for the Prevention of Cruelty to Animals (ISPCA and SPCAs), the Irish Horse Welfare Trust (IHWT), Sathya Sai, Hungry Horse Outside (HHO), the Donegal Donkey Sanctuary (DDS) and An Asal were visited to explore their ethos and practices, and gather data concerning the numbers, origins, types and fates of donkeys relinquished to them. As an example, TDS took 299 donkeys into its care in the year 2013 and transported 291 (other) donkeys to its parent organisation in Devon, England. At the time of writing (mid 2015) TDS reports that it has over 1,500 donkeys in its care on its own farms, in paid livery and/or in foster homes throughout the 32 counties of Ireland.

The research team designed a study to investigate real and perceived infectious disease threats to the equestrian community from donkeys. A review of the literature regarding the relevant susceptibility of donkeys to infectious disease and their variance in display of clinical signs vs. horses was first conducted. Members of the research team, either singly or in pairs, made visits to nine mixed equestrian events during the summer months of 2014 and collected both qualitative and quantitative data: ascertaining the views of donkey and horse keepers/exhibitors as well as inspecting bio-security features at events and examining the details of territory of origin of horse/donkey exhibitors.

Excepting acting as a reservoir of lungworm infestation, which is unlikely to be transmitted at equestrian events of short duration, donkeys do not pose any more risk to the horse population in Ireland than do horses. The enforcement of identification regulations for all equines is fundamental in controlling the movement of equines.
throughout Europe and managing the spread of equine infectious disease. When biosecurity controls are not in place (or enforced) at equestrian events to actually check passports, verify identification and ensure compliance with the requirements to register equine premises, such events may unwittingly act as the mechanism of spread of endemic and potentially more seriously exotic equine infectious disease. From this study, it seems that leisure and pleasure horse owners do not give much consideration to donkeys at all, thinking them to have “no practical use” and thus not meriting much consideration. This perception (that donkeys are “useless”) rather than any consideration of their role in disease transmission, may act as one driver for the currently low perceived worth of donkeys and thus the abandonment/relinquishment of animals that must then be dealt with by government agencies or animal welfare NGOs.

Qualitative study: reported in Chapter 6

Amongst other words the President of Ireland, Michael D. Higgins, has written in The Ass (2011):

"I recall the soft velvet of his ears,
as he bent in habit for the winkers,
the resignation too of his taking the bit
past the surrender of his yellow teeth.

The cross upon his back conferred no sacred status,
more a reminder of a burden carried,
nor did it guarantee the paring of his hooves...
More than an image lost it is a companion I seek to recover.

Data gathered, the issues raised and the contributing people/organisations formed the basis for the construction of a questionnaire used for the qualitative component of the research project.

Potential respondents were identified by the research team across 32 counties in Ireland in four groups corresponding with their primary role as regards donkeys:
- Central and local government involved in policy development and implementation, eight invitees
- Animal welfare organisations involved in rescue, sanctuary and rehoming of donkeys, ten invitees
- Breeders, owners, fosterers and keepers of donkeys, six invitees
- Service providers – veterinary, farriery, registration, advisory, advertising, eight invitees

Responses were received from 28 invitees provided with questions under the following section headings:

1. Background and general
2. Breeding, acquiring and disposing of donkeys
3. Disadvantaged Area Scheme (DAS) to be renamed as Areas of Natural Constraint, sometimes known as ‘Area Aid’ or ‘Headage’
4. Sanctuary/rescue/seizing/rehoming/foster
5. Solutions to the problem of unwanted donkeys

The responses were then subjected to a thematic analysis and reported under three global themes corresponding to sections 2, 3 and 4 above. Practical implementable suggestions were collated regarding indiscriminate donkey breeding, irresponsible ownership, adjusting eligibility criteria for agricultural aid schemes on a phased basis in future iterations of these schemes, and altering foster/rehome policies to saturate available spaces for donkeys with a view to improving donkey welfare and stabilising the donkey population.

Dissemination of information and implications for the future

Presentations to include the topic of donkey welfare in Ireland and abroad were given during the time of the research project at UCD School of Veterinary Medicine (Dublin), the Society of Biology Northern Ireland branch (Armagh), the Northern Ireland Veterinary Association AGM (Portadown), EuroGroup for Animals (Brussels) and the Equine Group of Veterinary Ireland Annual Conference (Kilkenny).
Peer-reviewed published papers are in preparation: a paper as reported in Chapter 5 has been peer-reviewed and accepted (subject to final editing) by the Irish Veterinary Journal. Additional paper(s) will be prepared in due course based on the findings reported here. It is also intended that this report will be disseminated widely to stakeholder organisations in Ireland.

Implications and conclusions: donkeys, in particular young uncastrated males, have little monetary value and few valued roles – the cost of castration and registration are seen to be disproportionate to their worth even with current eligibility criteria for the Areas of Natural Constraint (ANC) Scheme (in the 26 counties). Such donkeys represent approximately three quarters of those taken in by animal welfare organisations with little prospect of immediate rehoming or suitability for other roles (Donkey Assisted Therapy etc.). Indiscriminate breeding of donkeys is at the heart of the uncontrolled production of subsequently unwanted donkeys and the authors suggest that careful consideration should be given to promoting funded castration schemes and modifying Area Aid eligibility criteria that keep donkey geldings (in place of stallions) in available donkey places in the general farming and equestrian communities. Currently there are over 2,500 donkeys registered on DAS/ANC with no restrictions on type, facilities required or donkey welfare standards. The uncertainty that a review of eligibility criteria will bring and the effects of actual eligibility changes in future iterations of agricultural aid schemes are likely in the opinion of the authors to increase the numbers of both microchipped and as-of-yet unidentified donkeys offered for relinquishment, placing additional strain on the budgets of both government (if seized under Control of Horses or Animal Welfare legislation) and animal welfare organisations, which may have to re-examine their priorities if they are to continue to offer a service that safeguards essential donkey welfare.
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Chapter 2

Breeding, keeping, selling and otherwise disposing of donkeys in Ireland

Introduction

Available data was collected through a study of relevant resources online (e.g. legislation and advertising platforms), a series of visits to centres (such as Local authority pounds) and contacts with organisations concerned with the keeping of donkeys. These latter included private breeders and owners, fosterers, breed societies (such as the Irish Donkey Society), welfare organisations (such as the ISPCA), advertisers and government agencies charged with the management of the equine population in Ireland.

Breeding

There is no restriction or requirement in Ireland (in either legal jurisdiction on the island) for the licensing of breeding donkeys – stallions or mares – or other controls on the keeping of non-neutered animals: donkeys breed at their and their keepers’ discretion. During the early 2000s – a period of strong economic growth in Ireland – there was a demand for novelty items of all kinds and it was generally considered that there was profit in the breeding of donkeys for sale. Young donkeys (especially fillies) often traded for hundreds of €uro each at public horse fairs. Following specific expressions of concern by stakeholder groups regarding the welfare of equines at such fairs and markets (‘events’), the authors of this report conducted 30 visits to perform equine welfare assessments at horse fairs across the island of Ireland during the summer months of 2007, 2008 and 2009 (Collins et al, 2010). During this period of economic depression donkey foals were being traded for a nominal figure e.g. €20 for an uncastrated jack, and many remained unsold or were abandoned at the end of the event. At the time of writing this report (2015), donkey breeding is generally regarded as being conducted more on a random and indiscriminate rather than commercial basis: it is difficult to identify an economic market. The resultant offspring are still sometimes worth less than the cost of registration (microchipping and passporting), and in the case of young jacks considerably less than the cost of castration. Many are currently advertised ‘free-to-a-good-home’. Several castration methods are employed varying from ‘closed’ ligation techniques under general anaesthesia to emasculation (standing sedation) to the use of bloodless castrators (the Burdizzo). There is however general
agreement amongst the veterinary profession that horses are both less troublesome to castrate and attract a premium as compared to donkeys.

The official registration of donkeys in Ireland is reported in a separate section of this report dealing with Area Aid Schemes. These latter appear to be the primary driver for the registration of donkeys in Ireland (particularly in the 26 counties) excepting the small number of persons engaged in donkey driving and showing: the Irish Donkey Society has c40 members with an estimated 50 donkeys between them and the Donkey Breed Society (Northern Ireland branch) has c40 members with an estimated average of three donkeys per member (personal communications with the secretariats).

Keeping

The welfare of equines on farms in the 26 counties is the responsibility of DAFM under the European Communities (Welfare of Farmed Animals) Regulations (SI 14 of 2008). Since 2004, it has been a requirement under Irish national law (the European Communities (Stud-Book and Competition) Regulations 2004) for equines to be accompanied by identification documents when moved. As of July 2007, “A person shall not move onto or from a premises, enter for a show, competition, race or other cultural event, sell, supply, acquire, export, present for slaughter or slaughter a horse ... unless it is accompanied by an identification document” (European Communities (Equine Stud-Book and Competition) (Amendment) Regulations, 2007). Identification of equidae in Ireland was covered by Collins et al, 2008 and is dealt with further in Chapter 3 of this report.

In 2014 the legislation regarding the keeping of equines in Ireland was reinforced in three key areas – that those keeping horses must register their location and details; that those transferring responsibility for equines to another must register this event; and that a central register of equine identification must be set up coordinating registrations from each of the licensed HPIOs in Ireland.

The explanatory notes for the Control on Places where Horses are Kept Regulations 2014 (SI 113 of 2014) states that ‘these Regulations provide for the registration of land
and premises where equidae are kept and (the) maintenance of records regarding such places’. However only ‘horses’ are referred to in the Statutory Instrument (SI) itself and it is unclear at the time of writing if its legal scope extends to the keeping of donkeys. It is likely that this was the legislative intent (in the opinion of the authors) as the legal instrument is motivated by a desire to better understand and manage equine infectious disease; an amendment may however be needed to the SI to correct the omission.

The Equidae (Transfer of Ownership) Regulations (SI 189 of 2014) introduced a requirement that both parties involved in the transfer of ownership of an equine sign a declaration to this effect with notification to the HPIO; the identification document is to be transferred between the parties along with the equine. HPIOs produced change of ownership forms in response – see Appendix I for an example produced in March 2014 by Leisure Horse Ireland. SI 189 was revoked before the end of 2014 and replaced by Equidae (Transfer of Ownership) (no. 2) Regulations (SI 601 of 2014), which removed the requirement on the party transferring ownership of an equine to sign a declaration: the responsibility of declaring to the HPIO that they are now the responsible person now rests solely with the person accepting the equine.

Article 13 (1) of EU Identification of Equidae Regulations (SI 207 of 2014) states that an approved HPIO must provide relevant registration information (as determined in Article 21(1) of Commission Regulation EC 504/2008) for the purpose of including the information in a central database. These developments represent the beginning of a process of coordination of equine registrations in Ireland; it does not have retrospective effect; and there has been no effective tracing (to date) of the transfer of ownership, of export or of disposal. It thus will take considerable time and enforcement effort to evolve to a time when there is a robust record of the population of equines, including donkeys, in Ireland, each linked to a responsible person with reliable mapping of the location of these animals.
Selling

When questioned about how donkeys are most often advertised and sold, respondents to a qualitative questionnaire (reported in Chapter 6) cited online platforms (many named DoneDeal specifically), classified advertisements in local publications, e.g. The Dealer in County Mayo, horse fairs and “word of mouth”. There are no effective controls relating to the sale of donkeys at public fairs and it is not possible to track the advertising of donkeys in local printed media or to use such a study to gain a national profile of donkey advertising. National online platforms were thus investigated: neither Adverts.ie nor Pets.ie have records of any donkeys being advertised for sale; DoneDeal is currently the largest all-island platform for online nationwide sales of donkeys in Ireland and a study was conducted of its donkey advertising data.

DoneDeal already implements an in-house protocol governing the standards for advertisements it will accept for animals including donkeys. It is a key signatory to the setting up of voluntary national standards for the advertising of pets (including equids) via online platforms (IPAAG, 2015), launched by the Minister for Agriculture in April 2015. DoneDeal carried almost 700 individual donkey advertisements in the year 2013: the data is shown in Table 1 and Figure 1. DoneDeal takes down all advertisements automatically after 72 days; when an advertiser takes down an ad before this time it suggests that the advertiser doesn’t wish to receive any further enquiries and may imply that the item(s) are no longer for sale. This may suggest that a successful transaction has occurred but alternatively may indicate that the advertiser simply wishes to withdraw the offer. The number of advertisements put up on the system during the year is less than the total for those taken down (by advertiser or DoneDeal) for two reasons: some ads put up in late 2012 will be taken down in early 2013 (the same will occur in the change from 2013 to 2014), and some advertisers will take down an ad but pay a repeat fee to put the same ad back up at the top of the list (of donkeys for sale), making it available to be taken down again later (by the advertiser or by DoneDeal). For the year 2013 the peak of advertising of donkeys can be seen to be in April and May.
Figure 2 shows the number of donkey ads by county (as declared by the advertiser) in ads on DoneDeal in the year 2013; every advertiser must declare a county. County Galway featured strongly (92 advertisements); the five leading counties (each with more than 40 ads in 2013) were western Atlantic counties; and next in volume terms (38 ads each) were counties Cork and Wexford. The difference between county Donegal and neighbouring counties Derry, Tyrone and Fermanagh is striking. The low rate of advertising from Northern Ireland counties might be accounted for by, among other things, the ineligibility of donkeys for Agricultural Area Aid Schemes there. It should be noted that Donegal is the largest county in Ulster and fourth largest in Ireland in terms of land area, but not in terms of human population.

A further study was conducted of 200 sequential ads put up on DoneDeal in the months of April, May and June (as these are busy months for the advertising of donkeys) in 2012 and 2013. There were 292 donkeys advertised for sale in lot sizes varying from 1 to 12 donkeys. There were 115 advertisements for a single donkey of which 75 were male, and 40 were female; it was not possible to accurately determine the gender of all donkeys when advertised as part of a group, therefore gender assessment was confined to advertisements listing a single donkey only. The average age of donkeys advertised was three years; almost half (135 of the 292 donkeys advertised) were declared as aged two years or younger; and the spread of ages was from 10 years to one week (offered with dam).

Exporting

Enquiries regarding the movement of donkeys in the period 2010 to 2013 were made at each of Ireland’s ferry ports that accepts equine traffic, namely Rosslare port Co Wexford, Dublin port, and Belfast and Larne ports in Co Antrim. Rosslare port’s records show exports of equines on its routes to GB and France of between 5,000 and 6,000 for each of these years; there is no record kept of how many of these are donkeys but staff report that no donkeys travel on the France route (personal communication). The Donkey Sanctuary report that they have moved between 150 and 200 donkeys annually from Co Cork to Devon, GB via Rosslare during these years. Dublin port records show only the number of equine consignments (between 1,250 to 2,000 during
these years) and not the numbers of equines exported to GB; there are no records of
whether these consignments contained donkeys. Larne and Belfast report combined
donkey specific numbers of 187, 110 and 118 donkeys exported to GB in 25, 20 and 19
consignments in the years 2011, 2012 and 2013 respectively. The Donkey Sanctuary
reports that it moved 90, 77 and 137 donkeys in these same years respectively from
Northern Ireland to Devon GB, sometimes via Northern Ireland ferry routes, sometimes
via Dublin. Donkey Sanctuary figures regarding the keeping and movement of donkeys
are reported in more detail in Chapter 4.

Disposal

Abattoirs: the numbers of abattoirs licensed for equine slaughter in Ireland and the
numbers of equines slaughtered for human consumption (abroad) increased from
one licensed plant and approximately 2,000 animals in the mid-2000s to a peak of six
plants and approximately 23,500 animals in 2012. These numbers have subsequently
fallen again, in part mirroring Ireland’s economic performance but more particularly
due to the horsemeat scandal of January 2013. Horse protein was found to have
been fraudulently labelled as beef leading to more rigorous enforcement of equine
identification regulations, which require that an equine is correctly identified by means
of a valid identification document. Although a delicacy in some EU Member States,
respondents to a qualitative questionnaire in 2015 (reported here in Chapter 6) did not
generally believe that slaughter for human consumption represents a significant route
of disposal for donkeys in Ireland.

Relinquishment

Alternatively donkeys (often showing signs of neglect) were considered to be most
commonly disposed of by being offered to welfare organisations (further reported
in Chapter 4) or alternatively by abandonment on public or private lands, in which
case the issue might be reported to these same organisations with a request for
assistance. See Figure 3 for a typical illustration of the problems encountered.
Abandoned donkeys that are not collected by welfare organisations are mostly
impounded in the 26 counties of the Republic of Ireland following seizure by Local Authorities (LAs) under bye-laws and the powers conferred on them by the Pounds (Provision and Maintenance) Act, 1935 (SI 17 of 2035) and/or the Control of Horses Act (SI 37 of 1996). The Control of Horses (COH) Act was enacted in 1996 in response to a perceived (and apparently growing) problem with straying horses, horses being kept on LA lands without permission, horses being exercised in a manner that interfered with other persons (for example on public beaches), and the keeping of horses in locations considered inappropriate (for example urban high density housing units), by inappropriate persons and by those with insufficient resources to keep horses according to the latter’s needs (Collins et al, 2011). The Act was thus primarily introduced as an equine (including donkey) control measure and not as a means of addressing equine welfare concerns. Variation in how LAs implement the COH Act has long been a cause of concern for animal welfare organisations as well as other social groups such as the Traveller organisations. Louth County Council (Control of Horses) Byelaws 2003 for example state the required period of detention for a seized equine before disposal as being ten days. In Offaly County Council (Control of Horses) Byelaws 2014 this is cited as a minimum of three calendar days (although in practice they wait five).

In the six counties of Northern Ireland local Councils took over responsibility from the police service (PSNI) in 2012 for the management of stray or abandoned horses and for equine welfare generally: in Northern Ireland equines are not considered a 'farmed-animal' species and do not come under the remit of DARD NI.

Seized/impounded donkeys are later generally either offered to welfare organisations or alternatively euthanased and disposed of via the knackery system (Category II plants). In both North and South the seizure, keeping and disposal of equids by Local Authorities/Councils, though implemented at local level, is funded centrally by the department of agriculture (DARD NI and DAFM respectively).

The numbers of equids and, where available, the numbers of donkeys (in brackets) seized by each of the local authorities (in the 26 counties) and which of them resulted in a claim for funding from DAFM in the 26 counties is shown in Tables 2, 3 and 4 of
the years 2011, 2012 and 2013 respectively. The fate of these animals is also shown – reclaimed by the owner/keeper, rehomed to AN Other or euthanased (often on veterinary advice or other welfare grounds). The numbers of donkeys impounded in 2013 can be seen to have increased substantially compared to the two previous years with counties Galway and Mayo featuring strongly.

The numbers of equines seized and euthanased by Welfare Officers employed by councils in Northern Ireland (six counties as organised into five administrative regions) is shown in Table 5. It was not possible to obtain any record of how many of the equines were donkeys.

In Figure 4 is shown an illustration of the change in fate of seized equines generally in the 26 counties – euthanasia versus reclaiming/rehoming – in the years between 2008 and 2013 inclusively. By way of contrast Figure 5 shows the numbers and much lower percentages of seized donkeys that were euthanased in 2011, 2012 and 2013. In 2013, ‘only’ approximately one in three seized donkeys were euthanased as compared to more than three out of every four equines generally. Cullinane et al (2014) reported the predictors for euthanasia in the population of equines seized in Munster in a study period of 2005 to 2012. DAFM reimburses LAs on the basis of claims submitted quarterly using form COHI (see Appendix II). As from 2013 it only pays costs related to a maximum stay of five days following seizure, irrespective of individual LA byelaws. DAFM determines the rates of re-imbursement: as of Q4 (October 1st 2013) the rate payable in respect of a euthanased equine was €450 – a maximum dependent on provision of receipts to this effect. That payable for a horse was €200 and other equine €125 – maximums payable following all attempts by LAs to recoup the cost of seizure/impounding from those rehoming an equine, irrespective of whether to an animal welfare organisation or private individual. Such parties must provide details of their equine premises registration number. An examination of the donkey figures (the figures in brackets in the euthanasia columns in Tables 2, 3 and 4 are largely zero) shows that this pattern is not replicated in general for donkeys. This is largely due to an arrangement between The Donkey Sanctuary (TDS) and most Local Authorities that this charitable organisation will offer sanctuary to seized donkeys in preference to euthanasia, an arrangement that LAs seem willing to facilitate despite being then only
able to claim a maximum of €125 to cover their costs incurred. At the time of writing (mid 2015) DAFM has undertaken a review (which it has yet to publish) of the workings of the Control of Horses Act 1996.

EU Identification of Equidae Regulations (SI 207 of 2014) also conferred additional direct powers on DAFM authorised officers in relation to the seizure, impounding and disposal (including euthanasia after five days) of equines not identified in accordance with the legislation. There has been some reported use of these powers in relation to horses at the time of writing.

Conclusion

The (lack of) enforcement of legislation related to the breeding, keeping and trading of donkeys in Ireland emerged as a potential driver for the production of donkeys vulnerable to abandonment and thus impounding and disposal. The registration of donkeys and the fostering/rehoming of donkeys were recurring themes and are reported in Chapter three. The issues raised and knowledgeable persons encountered in the collection of data reported in these sections greatly informed the development of a qualitative project which is reported in Chapter 6.

References and legislation


Control on places where horses are kept regulations (SI 113 of 2014). DAFM (Ed.), Dublin


EC 504/2008 as regards methods for the identification of equidae. EU Commission.
European Communities (Welfare of Farmed Animals) Regulations (SI 14 of 2008). DAFF (Ed.), Dublin
European Union (Identification of equidae) Regulations (SI 207 of 2014). DAFM (Ed.) Dublin
Louth County Council (Control of Horses) Byelaws 2003.
Offaly County Council (Control of Horses) Byelaws 2014.
Table 1 and Figure 1 show the number of donkey advertisements taken out in each month of 2013, the number of ads in each month that were voluntarily taken down by the advertiser and the number that were taken down by the host platform, DoneDeal, as expired (after 72 days live online).
Figure 2: the number of donkey advertisements arranged alphabetically by county (as declared by the person commissioning the ad) on the online platform, DoneDeal, in the year 2013.
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Table 2: the numbers of equids (with donkeys as a subset in brackets where available) seized, reclaimed by the keeper, rehomed to AN Other and euthanased by each of the Local Authorities in 26 counties in 2011 for which a claim for funding was submitted to the Department of Agriculture, Food & the Marine (DAFM).
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Table 3: the numbers of equids (with donkeys in brackets where available) seized, reclaimed by the keeper, rehomed to AN Other and euthanased by each of the Local Authorities in 26 counties in 2012 for which a claim for funding was submitted to the Department of Agriculture, Food & the Marine (DAFM).
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<th>Number of equines rehomed 2013</th>
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Table 4: the numbers of equids (with donkeys in brackets where available) seized, reclaimed by the keeper, rehomed to AN Other and euthanased by each of the Local Authorities in 26 counties in 2013 for which a claim for funding was submitted to the Department of Agriculture, Food & the Marine (DAFM).
Table 5: the numbers of equids seized and the numbers of these that were euthanased in local Councils in Northern Ireland (six counties) as organised into five administrative regions between 2012 and 2014.

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Figure 3: the grossly overgrown feet of a typical abandoned donkey
Figure 4: an illustration of the increase in the percentage of equines seized under the Control of Horses Act, 1996 which were subsequently euthanased and not reclaimed by the owner/keeper or otherwise rehomed, between 2008 and 2013 in the 26b counties of the Republic of Ireland.

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<td>16.8%</td>
</tr>
<tr>
<td>2013</td>
<td>113</td>
<td>38</td>
<td>32.6%</td>
</tr>
</tbody>
</table>

Figure 5: the numbers and percentages of donkeys seized under the Control of Horses Act 1996 (in 26 counties) that were euthanased in the years 2011, 2012 and 2013.
Transfer of Ownership Form

- Please complete this form at the time of sale and pass on to the new owner(s).
- The new owner(s) must then apply to us to have the transfer of ownership recorded on the passport.
- A transfer fee of €15.00 incl vat @ 23% is payable and should be forwarded to us (or prepaid by card), along with this fully completed form and the animal’s passport.
- Recorded return delivery (highly advisable as risk of loss in standard post lies with you)

I / We the undersigned declare that I / We have sold the animal known as:

Name Of Animal: ___________________________

Passport Reg No.: ___________________________

Name Of Seller: ___________________________

Address Of Seller: ___________________________

Contact Tel. No.: ___________________________

Signed (Seller): ___________________________ Date: / /

To (The Buyer):

Name Of Buyer: ___________________________

Address Of Buyer: ___________________________

Contact Tel. No.: ___________________________

Signed (Buyer): ___________________________ Date: / /

PLEASE NOTE:
- New owners should ensure that the last named owner in the passport is the person you are buying from, otherwise supporting documentation will be required.
- Should the animal be registered in joint names both / all signatures are required.

I enclose the balance of fees due of €__________ or Prepaid By Card Ref: ____________

Euro cheques only etc made payable to Leisure Horse Ireland (the new Trading name of The IPSA)

We also accept please telephone 091 577 577 in advance (intl tel +35391577577).
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<table>
<thead>
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<tbody>
<tr>
<td>1.</td>
<td>Number of horses reported to Local Authority</td>
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<td>Number of aborted foals</td>
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<td>3.</td>
<td>Number of horses seized by Local Authority</td>
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<td>Number of horses seized by private pounds e.g. LAS, ACS, Cantor</td>
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<td>Name (if applicable) of outside contractor used for collection, transport, housing and disposal of horses</td>
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<td>6.</td>
<td>Number of Horses reclaimed by owner</td>
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<td>7.</td>
<td>Amounts received in respect of numbers of horses reclaimed</td>
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<tr>
<td>8.</td>
<td>Number of horses rehomed (to persons other than owners)</td>
</tr>
<tr>
<td>9.</td>
<td>Amount received in respect of number of horses rehomed</td>
</tr>
<tr>
<td>10.</td>
<td>Number of Horses Euthanized/Disposed at Knackeries</td>
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<td>11.</td>
<td>Number of on: Spot fines imposed</td>
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<td>12.</td>
<td>Number of on: Spot fines paid (end value)</td>
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<td>13.</td>
<td>Number of Prosecutions brought to court for unpaid fines</td>
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<td>14.</td>
<td>Number of Prosecutions brought to court for other offences</td>
</tr>
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<td>15.</td>
<td>Number of court convictions obtained and value of fines imposed</td>
</tr>
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<td>16.</td>
<td>Number of horses impounded for 2nd offence</td>
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<td>17.</td>
<td>Number of horses impounded for 3rd or subsequent offence</td>
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<td>18.</td>
<td>Number of licence applications</td>
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<td>20.</td>
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<td>21.</td>
<td>Total amount deducted from claim</td>
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<tr>
<td>22.</td>
<td>Number of horses remaining in pound at end of quarter</td>
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</table>

This form to be returned to:

Control of Horses Section

Department of Agriculture, Food & the Marine, Meetinghouse St, Raphoe, Co. Donegal.

Telephone 074 9173600
Identification of equidae including donkeys

National legislation SI 399 of 2004 (European Communities (equine stud-book and competition) Regulations 2004) laid down conditions for the setting up of studbooks and other horse registration bodies and the criteria required for the correct identification of equidae. This was re-enforced in 2009 by EU law (Regulation EC 504/2008 as regards methods for the identification of equidae) making it a legal requirement (with minimal exceptions for wild populations) that equidae including donkeys and mules in Member States (MSs) be registered with an approved Horse Passport Issuing Organisation (HPIO) and that all equidae identified by documents (including via replacement and duplicate passports) issued subsequent to this time be implanted with a microchip transponder.

In September 2014 the EU Commission announced its intention to strengthen EC Regulation 504/2008 and require each MS to set up a central database by July 2016 coordinating the registration of equidae by HPIOs in its territory (EU Commission, 2014). EC Regulation 262/2015 will thus replace EC 504/2008 from January 1st 2016 with a six-month lead-in period before those MSs (such as the UK) that do not already have a central equine database must have one in place. In the opinion of the authors these steps, though laudable, are not likely to result in a robust, up-to-date database identifying each living equine and linking it with a current responsible person. The EU Animal Health law being drafted at the time of writing may ultimately require each MS to develop a central issuing authority for equine identification – as currently occurs for bovine animals – with breed societies continuing to run a stud-book but not issue passports. With this model, coordination between each MS single issuing authority may be possible – to capture, for example pedigree ‘Irish’ equines (as is legal) that are registered with non Irish HPIOs such as the Donkey Breed Society (UK).

Agricultural Area Aid Schemes

A variety of farm subsidy schemes apply to the farming of land in Ireland with variable arable, livestock and environmental focus. ‘Cross-compliance’ inspections by officials from the Department of Agriculture, Food and the Marine (DAFM) follow. In order
to claim agricultural subsidies such as Disadvantaged Area Scheme (DAS)/Areas of Natural Constraint (ANC) payments farmers have to demonstrate that the land is being farmed. This generally means keeping, and demonstrating that they keep, qualifying livestock at a level above an agreed minimum stocking density, which are correctly identified and recorded. Subsistence farmers – by definition farming in disadvantaged areas of natural constraint – may find that the farming of cattle or sheep is a marginal or indeed loss-making enterprise, particularly if the time and resource inputs required are factored in correctly and if due consideration is given to the standards required for these traditionally farmed species; standards that are assessed during cross-compliance on-farm inspections. Many such farmers are part-time with off-farm commitments and limited time to devote to the care of (potentially non-profitable) farm stock.

Equidae (horses, donkeys and their crosses) have long been eligible to be recorded as livestock units (LUs) for the purposes of calculating stocking densities. In 2012 rules regarding the use of horses as qualifying livestock (for agricultural subsidy schemes) became more restrictive. The authors speculate that farmers might thus increasingly view donkeys as a low-cost means of reaching the relevant minimum stocking density required, particularly in the absence of requirements and inspections of specific equine welfare inputs (buildings, shelter, feed) or outputs (body condition score, hoof health etc.).

Disadvantaged Areas/Areas of Natural Constraint Scheme

The Disadvantaged Areas Scheme was originally introduced in Ireland under EEC Council Directive 268/75. The preamble to this Directive expressly states that steps should be taken to ‘ensure the continued conservation of the countryside in mountain areas and in certain other less-favoured areas’. It was continued in Ireland’s Rural Development Plan 2007-2013 as an Axis 2 measure designed to ‘improve the environment and the countryside’. This plan explains the scheme’s objectives as supporting farmers in ‘less favoured areas’ who face significant handicaps deriving from factors such as remoteness, difficult topography and poor soil conditions. Such farmers tend to have lower farm productivity and higher unit cost production costs than farmers in other areas and thus without financial support, the viability of these
farming communities would be threatened. Support under the scheme is intended to contribute to:

- Ensuring continued agricultural land use, thereby contributing to the maintenance of a viable rural society.
- Maintaining the countryside.
- Maintaining and promoting sustainable farming systems, which in particular take account of environmental protection requirements.

In June 2012 the Department of Agriculture, Food and the Marine (DAFM) published a Value for Money (VFM) Review of DAS and in July 2014 DAFM published its Draft Rural Development Programme (RDP) 2014-2020 both of which echoed the rationale and objectives stated above with reference to DAS for 2007-2013, with DAS now to be renamed Areas of Natural Constraint (ANC).

The total area designated as ‘disadvantaged’ stands at 5,155,438 hectares (some 75% of Ireland’s total land area); qualifying areas as of 2014 are shown in the map in Figure 1. The DAS is co-funded by the EU with matching funding of 55% available; total net payments made in 2011 amounted to some €221 million, which included €6.2M to almost 18.5 thousand applicants who used equines to fulfil at least part of their minimum stocking density requirement. The numbers of applicants who registered equines (horses and/or donkeys) as Livestock Units (LUs) and the value of payments made to these applicants in the years between 2010 and 2014 inclusively are shown in Figure 2. Areas under roads, paths, buildings, farmyards, woods, scrub, rivers, streams, ponds, lakes, sand, areas of bare rock and boglands ‘unfit for grazing’ are deemed ineligible for inclusion in the Scheme. DAS documentation states that ‘the type of animals must be appropriate to the land and there must be handling facilities available to meet the animals’ welfare requirement’.

**Donkeys as compared to other animals as Livestock Units (LUs)**

Minimum stocking densities, a minimum period for which livestock must be retained and minimum acreage are set out each year and have been subject to
some adjustments. The minimum stocking density, for example, has been fixed at 0.15 Livestock Units (LU) per hectare, however applicants for the scheme in 2012 had to show a stocking density of at least 0.3 LU/hectare in the previous year or be issued with a derogation. The stock retention period was increased from six to seven consecutive months in 2013. And the minimum acreage has been held at 3 hectares of forage land in recent years.

Cattle, sheep, deer, horses and donkeys qualified for use in the calculation of minimum stocking densities at varying LU value e.g. cattle over two years of age qualified as 1 LU each, the same as a donkey. The rules regarding the use of horses as LUs were changed in 2012 whereby applicants had now to firstly show that their farm qualified as an ‘equine breeding enterprise’ before the keeping of horses as qualifying livestock was permitted. Specifically, an applicant intent on using horses in 2012 had to demonstrate that he/she had bred at least one foal in the previous three years from a mare registered as on the applicant’s holding in 2012. This mare (or mares) had to be registered in a Stud Book approved by DAFM with both sire and dam pedigree recorded. The applicant could then count such mares (as LUs) but in addition count all equines aged one to five years registered in his/her name and maintained on his/her holding. Donkeys continued to be eligible for inclusion in the stocking density calculation in 2012 without the need to demonstrate any additional such requirements – donkeys ‘simply’ had to be appropriately registered with identification (not pedigree) documentation showing the animal(s) concerned were in the ownership of the given applicant. The effect of this change is reflected in the official figures published: in the year 2011 there were 3,774 DAS applicants who registered 18,447 equines on the scheme. In 2012 there were only 1,469 applicants, who registered only 6,768 equines.

Donkeys cannot be separated from horses in the figures up to and including the year 2011. In Table 1 are shown figures on a county-by-county basis (for 26 counties) of the numbers of applicants registering donkeys, the numbers of donkeys they registered and the value of payments made to these applicants in the years 2012, 2013 and 2014. It can be seen that counties Galway and Mayo account for approximately one third of the total number of both applicants and donkeys, with an average of 3.5 donkeys per applicant. The latest figures (2014) show that there are some 2,500 donkeys registered
on DAS/ANC with a total payment value to donkey keepers in the 26 counties of €1.6M.

The number of donkeys registered by persons not registering any horses for use on DAS/ANC in 2014 was 1,471 (in the care of 405 applicants) from a total of 5,156 equines (2,544 of them donkeys) in the care of 1,280 applicants. The corresponding figures for the year 2013 were: 1,591 donkeys (from a total of 2,593 donkeys) in the care of 411 donkey-only applicants as a subset of 6,159 equines in the care of 1,436 equine-keeping applicants to DAS. It should be acknowledged that these ratios are probably very different from those for the proportion of donkeys to horses and the proportion of donkey keepers to horse keepers in the general equine population in Ireland. However, these latter ratios are not accurately calculable until such time as all equine births, exports and deaths linked to equine premises registrations are centrally recorded (Collins et al, 2008).

All eligible equines (brood mares and other horses aged one to five years, and donkeys) qualify as 1 LU for the purposes of stocking density calculations. Cattle by way of contrast qualify only as 0.6 LU up to the age of two and sheep/goats as 0.15 LU. An additional driver for the keeping of 'rare breed' horses (most notably registered Connemara ponies was (and remains) their use to gain a derogation from the need to maintain the minimum stocking density of 0.15 LU/hectare required by ANC, by being first enrolled on an Agri-Environmental Scheme (REPS followed by AEOS followed in 2015 by GLAS). As donkeys are not eligible rare-breed animals this issue will not be further considered here.

Donkey registrations

New applicants intent on using donkeys as LUs must submit supporting documentation (at a minimum photocopies of passports showing the applicant as the registered keeper) by the end of May at the latest in a given year and again seven months later (to satisfy the retention criteria). Most applicants make repeat serial yearly applications for DAS subsidies and DAFM maintain a record of documentation submitted in previous years. HRI has been the primary Passport Issuing Authority for
donkeys in Ireland and has issued 8-9,000 donkey passports since 2004. Figure 3 shows Horse Sport Ireland’s (HRI) total registration data for donkeys between 2004 and 2013. There were significant increases in the number of passports issued for donkeys in the year 2008 as compared to 2007 (possibly related at least in part to the introduction of new identification of equidae regulations), and again in the year 2012 as compared to 2011 (possibly related to changes in eligibility criteria for horses on DAS). Table 3 shows HRI figures for the numbers of donkeys and percentages by county or territory of origin of the applicant since 2004 and for the year 2013 in isolation. The figures for Counties Galway and Mayo are noteworthy with over 30% of applications originating in these two counties and only 1-2% from the six counties of Northern Ireland combined. Only 34% of donkeys registered by HSI have been male, only 6.5% of which are recorded as gelded; the percentages of female donkeys registered from each county are shown in Table 2. HRI figures for donkey registrations in 2013 also show that only 6% of applications were for foals, and figures don’t include donkeys relinquished to The Donkey Sanctuary in Ireland (either north or south). This animal welfare charity sources passports from the Donkey Breed Society (UK) via its headquarters in Devon to the number of 359, 97 and 217 Irish donkeys in the years 2011, 2012 and 2013 respectively; this UK Passport Issuing Organisation registered approximately 30 additional donkeys in 2013 that originated in Ireland (including Northern Ireland). And in 2013 Leisure Horse Ireland set up a donkey stud book in which they registered 79 donkeys during its first year.

Developments in Area Aid Schemes

In September 2011 DAFM’s report under the Government’s Comprehensive Expenditure Review initiative was published and one proposal it offered for consideration regarding the DAS was that horses (excepting those on ‘equine breeding enterprises’) and donkeys should no longer be eligible (for use as LUs) on the basis that these applicants’ contribution to the rural economy was minimal. These proposals were later considered by the VFM Review, which published proposals for alternative approaches that might lead to more efficient and effective delivery of DAS, and concluded that these should be considered in the context of the implementation of a new RDP (for 2014-2020). However, no mention is made in the final draft of the RDP 2015-2020 submitted to the
EU Commission in July 2014 of any proposed change to the use of donkeys or other equids on the new ANC Scheme.

It is intended that the new ANC Scheme will replicate existing DAS payment levels and structures in the early years of the RDP 2014-2020; there might however be potential for change in eligibility criteria including the status of donkeys as qualifying livestock units; and there is a stated requirement for the areas covered by the scheme to be reassessed on the basis of new biophysical criteria by 2018, which may lead to change from the areas denoted in Figure 1. There will be an expected spend of approximately €1.4 billion in EU and national funds in ANC (including new supports for island farming) over the lifetime of the 2014-2020 RDP from an estimated total spend of €4 billion in this plan over this period.

Conclusion

At the time of writing (April 2015) the terms and conditions of the latest iteration of the Areas of Natural Constraint Scheme are being finalised. DAFM has decided not to change the eligibility criteria for donkeys for 2015. The authors understand, however that DAFM is giving active consideration to introducing adjustments for future years – potentially restricting new donkey applications and/or the registration of new donkeys on existing applications, capping the number of donkeys an applicant might register for use as Livestock Units (LUs), or otherwise capping the percentage of an applicant’s LU requirement that he/she can fill using donkeys. According to figures published for 2014, there are over 2,500 donkeys registered as LUs on DAS/ANC at a payment value to their keepers (in the 26 counties) of almost €1.6M. The authors believe that the future value (and potentially welfare) of these donkeys will be significantly affected not only by actual changes to donkey eligibility if/when these occur, but also by the uncertainty engendered by the prospect of change. There may be consequences for the future fostering/rehoming of donkeys by animal welfare organisations, only some of which currently sign over ownership to the recipients (foster-carers). They also believe that the welfare of indiscriminately bred donkeys that might no longer prove eligible for ANC will be under even greater threat than before. The authors urge caution and careful consideration of how donkey eligibility criteria might be adjusted with what potential unintended consequences.
## Figures and tables

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Table 1: The number of applicants to the Disadvantaged Area Scheme with donkeys, the number of donkeys they registered and what payments were made to these applicants for each of 26 counties in the years 2012, 2013 and 2014.
Figure 2: the number of Disadvantaged Area Scheme applicants who registered equines (horses and/or donkeys) as Livestock Units (LUs) and the Euro value of payments that accrued to applicants during the years 2010, 2011, 2012, 2013 and 2014 in Ireland (26 counties).

Figure 3: the numbers of donkeys for which Horse Sport Ireland (HSI) issued passports over a ten year period - between the years 2004 and 2013 inclusively.
Table 3: the total numbers and percentages (%) of donkeys and of female donkeys registered between 2004 and 2013 and the numbers and percentages for 2013 donkey registrations in each of 26 counties, Northern Ireland and abroad by Horse Sport Ireland.

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<th>County of owner/keeper</th>
<th>Number of donkeys registered in 2013 (%)</th>
<th>Total number of donkeys registered 2004-2013 (%)</th>
<th>Total number of female donkeys registered (%)</th>
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</thead>
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<td>67 (0.85%)</td>
<td>58 (1.12%)</td>
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<tr>
<td>Cavan</td>
<td>46 (3.07%)</td>
<td>266 (3.37%)</td>
<td>190 (3.65%)</td>
</tr>
<tr>
<td>Clare</td>
<td>101 (6.74%)</td>
<td>540 (6.85%)</td>
<td>362 (6.96%)</td>
</tr>
<tr>
<td>Cork</td>
<td>77 (5.34%)</td>
<td>501 (6.35%)</td>
<td>305 (5.87%)</td>
</tr>
<tr>
<td>Donegal</td>
<td>124 (8.28%)</td>
<td>473 (6.00%)</td>
<td>332 (6.38%)</td>
</tr>
<tr>
<td>Dublin</td>
<td>8 (0.53%)</td>
<td>54 (0.68%)</td>
<td>36 (0.69%)</td>
</tr>
<tr>
<td>Galway</td>
<td>302 (20.21%)</td>
<td>1264 (16.03%)</td>
<td>896 (17.23%)</td>
</tr>
<tr>
<td>Kerry</td>
<td>187 (12.48%)</td>
<td>569 (7.22%)</td>
<td>331 (6.37%)</td>
</tr>
<tr>
<td>Kildare</td>
<td>0 (0%)</td>
<td>39 (0.49%)</td>
<td>27 (0.52%)</td>
</tr>
<tr>
<td>Kilkenny</td>
<td>4 (0.27%)</td>
<td>51 (0.65%)</td>
<td>35 (0.67%)</td>
</tr>
<tr>
<td>Laois</td>
<td>9 (0.60%)</td>
<td>39 (0.49%)</td>
<td>30 (0.58%)</td>
</tr>
<tr>
<td>Leitrim</td>
<td>97 (6.48%)</td>
<td>423 (5.37%)</td>
<td>283 (5.44%)</td>
</tr>
<tr>
<td>Limerick</td>
<td>21 (1.40%)</td>
<td>64 (0.81%)</td>
<td>50 (0.96%)</td>
</tr>
<tr>
<td>Longford</td>
<td>45 (3.00%)</td>
<td>190 (2.41%)</td>
<td>120 (2.31%)</td>
</tr>
<tr>
<td>Louth</td>
<td>9 (0.60%)</td>
<td>44 (0.56%)</td>
<td>28 (0.54%)</td>
</tr>
<tr>
<td>Mayo</td>
<td>212 (14.15%)</td>
<td>1224 (15.54%)</td>
<td>788 (15.15%)</td>
</tr>
<tr>
<td>Meath</td>
<td>9 (0.60%)</td>
<td>78 (0.99%)</td>
<td>29 (0.56%)</td>
</tr>
<tr>
<td>Monaghan</td>
<td>11 (0.73%)</td>
<td>96 (1.22%)</td>
<td>67 (1.29%)</td>
</tr>
<tr>
<td>Offaly</td>
<td>3 (0.20%)</td>
<td>29 (0.37%)</td>
<td>23 (0.44%)</td>
</tr>
<tr>
<td>Roscommon</td>
<td>51 (3.40%)</td>
<td>421 (5.34%)</td>
<td>309 (5.94%)</td>
</tr>
<tr>
<td>Sligo</td>
<td>93 (6.21%)</td>
<td>494 (6.27%)</td>
<td>318 (6.12%)</td>
</tr>
<tr>
<td>Tipperary</td>
<td>26 (1.74%)</td>
<td>166 (2.11%)</td>
<td>105 (2.02%)</td>
</tr>
<tr>
<td>Waterford</td>
<td>9 (0.60%)</td>
<td>29 (0.37%)</td>
<td>11 (0.21%)</td>
</tr>
<tr>
<td>Westmeath</td>
<td>17 (1.13%)</td>
<td>126 (1.60%)</td>
<td>75 (1.44%)</td>
</tr>
<tr>
<td>Wexford</td>
<td>7 (0.47%)</td>
<td>178 (2.26%)</td>
<td>116 (2.23%)</td>
</tr>
<tr>
<td>Wicklow</td>
<td>16 (1.07%)</td>
<td>126 (1.60%)</td>
<td>77 (1.48%)</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>11 (0.70%)</td>
<td>150 (1.90%)</td>
<td>105 (2.02%)</td>
</tr>
<tr>
<td>Abroad</td>
<td>1 (0.07%)</td>
<td>181 (2.30%)</td>
<td>94 (1.81%)</td>
</tr>
</tbody>
</table>
References


EC 504/2008 as regards methods for the identification of equidae. EU Commission.


Helpsuet / Terms & Conditions for the 2012 EU Disadvantaged Areas Scheme, DAFM

Helpsuet / Terms & Conditions for the 2013 EU Single Payment Scheme (SPS) and other 2013 Area - Based Schemes, DAFM

Value for Money Review of the Disadvantaged Areas Scheme, DAFM published June 2012

Ireland’s Rural Development Programme 2014-2020 Draft of July 2014, DAFM

MSG and DAS Areas in Ireland

Legend
- Counties of Ireland
- Mountain Sheep Grazing

DAS Areas
- More Severely Handicapped
- Less Severely Handicapped (Article 3.4)
- Less Severely Handicapped (Article 3.5)
A core task of animal welfare charities is to respond to notifications of animals in need, and then provide a rescue service and solutions to address the welfare needs of the animals concerned – see Figure 1 for an example of this work. Animal welfare charities vary in their policy with regard to the long-term care of rescued animals. All provide immediate (including veterinary) assessment and care but thereafter may differ with respect to rehabilitation, sanctuary, fostering/rehoming and euthanasia. Some hold the sanctuary concept as a core tenet and much of the public funding they receive might depend on the giver’s confidence in this core belief. Conversely other organisations adopt a more pragmatic view (most likely without unsolicited publicity about harsh realities) to the humane destruction of animals not deemed rehomeable – for reasons as diverse as ill health, ill-suited temperament, age, gender and excess supply over demand. Some retain legal ownership of all donkeys they foster/rehome, but others are willing to sign donkeys over into the stewardship of farmers for registration in their name (as is a requirement of the scheme) on Disadvantaged Area Schemes.

Donkey welfare services in Ireland are most notably and publicly provided, both directly and indirectly via other animal welfare organisations, by The Donkey Sanctuary Ireland (TDS) as evidenced by the data in Tables 1 and 2. This Irish-registered charity is headquartered in Liscarroll, Co Cork from where it runs a veterinary hospital and several sanctuary farms; oversees a network of donkey holding bases and livery yards; and employs a team of welfare advisors across the 32 counties of Ireland. TDS Ireland is a subsidiary of The Donkey Sanctuary UK, which provides financial, managerial, strategic and policy input as well as offering sanctuary to Irish donkeys sent to its HQ in Devon. In 2014, TDS (Ireland) had in the region of 1,500 donkeys in its care either directly on its own farms, on livery/licensed premises or in foster homes. As a further example of its welfare activities, TDS received over 700 requests to take donkeys during 2014 through its direct helpline, from current owners/keepers and from government and non-government agencies; it took in 388 donkeys. Figures for donkeys accepted by TDS during 2011, 2012 and 2013 from each of four provinces of Ireland and the numbers it sent to the Donkey Sanctuary UK are shown in Table 1. The numbers of donkeys taken in by TDS had shown a steady rise until the end of 2011 at which point a pre-admission welfare form was introduced and ‘all-comers’ were no longer accepted without question. A grading system was introduced whereby donkeys in private homes
with satisfactory welfare standards were not prioritised for relinquishment. Instead TDS fostered an arrangement with most local authorities impounding donkeys under the terms of the Control of Horses Act 1996 that it would offer sanctuary rather than see the humane destruction of seized donkeys unless these are to be euthanased on veterinary grounds. In Figure 2 the county of origin of donkeys taken in during between 2011 and 2013 is illustrated. With the notable exceptions of Counties Kildare and Mayo the numbers of donkeys accepted in 2013 can be seen to have stabilised: the exceptions may indicate a greater need in those counties but might also be related to the presence of an alternative – an active impounding sub-contractor has operated in these areas providing impounding services across several county boundaries.

The Irish Society for the Prevention of Cruelty to Animals (ISPCA) and the Irish Horse Welfare Trust (IHWT) are equine welfare charities with a nationwide penetration and profile, the former also dealing with other animal species, the latter focused on horses. Both coordinate activities with TDS as regards donkey-specific calls and the care needs that follow. The ISPCA runs an equine-specific centre in north County Cork where it provides a rescue service and rehoming (rather than long-term sanctuary) facility to equines, including donkeys. The IHWT runs a similar facility in County Wicklow but (perhaps for geographical reasons) encounters fewer donkeys in welfare need and generally offers these to TDS for long-term management. Donkey relinquishment and rehoming figures for the ISPCA and IHWT can be seen in Table 2.

Other more regional or local non-government (NGO) welfare groups such as Hungry Horse Outside (HHO, Longford), Sathya Sai (Sligo), Donegal Donkey Sanctuary (DDS, Donegal), An Asal (Wexford), Animal Heaven Animal Rescue (AHAR, Kerry) and local Societies for the Prevention of Cruelty to animals (SPCAs, various counties) have varying policies with regard to the rescue/sanctuary and/or rehoming of donkeys and to the coordination of activities with TDS. Some (such as DDS) run entirely independent advice, rescue, sanctuary and rehoming schemes; some (such as Sathya Sai and HHO, which latter also acts as an impounding sub-contractor for Local Authorities in the area) cooperate closely on operational matters and refer to TDS on an ad hoc basis depending on need and circumstances. Others invariably pass on enquiries and offer healthy and/or welfare compromised donkeys to TDS in preference
to euthanasia. Available figures for the intake and rehoming of donkeys for these organisations in recent years are shown in Table 2.

Many animal welfare NGOs receive ex-gratia government funding via DAFM, which inspects establishments in receipt of funding and publishes annual figures for the monies provided to each organisation: in 2015 this totalled €1.87M spread between 142 organisations with a spread of payments from €1-210,000. This was the fourth successive year in which DAFM funding was increased, despite a general trend on reduction in government spending during those recessionary times. Figures for selected charities involved in donkey welfare are reproduced in Table 3 with the caveat that some of these organisations are greatly involved with non-donkey animal welfare and some operate on a national as compared to local scale. There are significant and variable costs associated with the rehabilitation of neglected and abused donkeys, with providing sanctuary, with preparing donkeys (including castration and training) for foster/rehoming, with the correct monitoring of donkeys in foster or livery care, and indeed with humane euthanasia and disposal. Organisations thus look carefully to their budgets and the relative resources they allocate to care, on-farm rehabilitation, outsourcing, inspection and management of foster homes and to humane destruction.

Inherent in the ethos of TDS is that it does not euthanase healthy donkeys, only those whose long-term health and welfare are considered to be unreasonably compromised, despite the best veterinary care available. Instead TDS, in common with others like the DDS, Sathya Sai and An Asal, offers long-term sanctuary care to donkeys for which foster homes cannot be found. Donkeys in the long-term care of TDS at one of its licensed holding bases are shown in Figure 3. Typical reasons for long-term sanctuary care are an excess of supply of donkeys over suitable homes, chronic disease such as laminitis and obesity, recurrent disease such as sarcoids and failure of its bonded mate to be deemed suitable for transport or rehoming.

Textbook definitions would distinguish between ‘fostering’ and ‘rehoming’ in the context of animal welfare. Generally implied in the former is a sense that the relationship is time-limited and that it is expect that the fosterer will return the animal to the parent organisation (which retains ownership) at some, possibly pre-set, time.
The word ‘rehome’ is more properly applied to the long-term adoption of an animal by someone who becomes the legally responsible person. With donkeys (as with other equids) the distinctions are sometimes blurred with the retention of legal ownership (as evidenced by an entry in the animal’s passport) by the parent organisation such as the ISPCA or IHWT though the animal has been ‘rehomed’, or the expectation that a foster arrangement will be long-term or even permanent in duration barring stated reasons for return, as implied by TDS foster mission statement, which reads: ‘The foster scheme enriches the lives of donkeys by the provision of individual care in high quality loving homes. Fostering offers people and donkeys the opportunity to form long lasting, life enhancing relationships, whilst providing a meaningful contribution to the charity and making way for donkeys in desperate need worldwide.’

Another key feature of rehoming/fostering of donkeys as evidenced by the TDS foster mission statement is the provision of more individual or small group care as compared to the larger herd model inherent in sanctuary care. Rehoming/fostering also increases the profile of donkeys in the general community, creates space for the rescue and rehabilitation of other donkeys in need and provides opportunities to foster human-animal bonds to the benefit of individual persons in their own homes. Opinions vary on whether individual/small group care best provides for the welfare needs of donkeys, which are a social species with a general tendency to pair bond, but which can live happily in donkey herds, in mixed equine herds and have a variably affectionate nature toward humans. In 2013, TDS supervised 186 foster homes spread across the 32 counties, with an average of two donkeys fostered in each home. The number of foster homes in each of the four provinces in 2013 and the numbers of donkeys fostered out by TDS in 2011, 2012 and 2013 are shown in Table 4.

Donkey assisted therapy (DAT) on a more organised basis is promoted and practised by TDS at centres it funds and through outreach visits, in a broadly similar manner to equine assisted riding and learning/therapy as practised by other NGOs such as Riding for the Disabled (the RDA) nationally and Festina Lente, Bray, Co Wicklow. A national coordinating body exists – EFETA – the Equine Facilitated Education and Therapy Association. These and nursing homes may provide further opportunities in the future for the fostering of donkeys into homes/establishments with enhanced opportunities to mutually benefit both donkeys and people.
Figure 1: a donkey showing the pre-rescue (left fore and hind) and post-rescue (right fore and hind) appearance of its hooves.

Table 1: the numbers of donkeys relinquished to the care of The Donkey Sanctuary (Ireland) from each of four provinces, and the number sent to The Donkey Sanctuary UK headquarters (TDS HQ) in Devon in the years 2011, 2012 and 2013.

<table>
<thead>
<tr>
<th>Province Description</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Munster (6 counties)</td>
<td>109</td>
<td>43</td>
<td>29</td>
</tr>
<tr>
<td>Leinster total (12 counties)</td>
<td>127</td>
<td>54</td>
<td>94</td>
</tr>
<tr>
<td>Connacht total (5 counties)</td>
<td>107</td>
<td>50</td>
<td>116</td>
</tr>
<tr>
<td>Ulster total (9 counties)</td>
<td>97</td>
<td>106</td>
<td>160</td>
</tr>
<tr>
<td>No details / miscellaneous</td>
<td>9</td>
<td>8</td>
<td>11</td>
</tr>
<tr>
<td>Total relinquishments</td>
<td>440</td>
<td>253</td>
<td>399</td>
</tr>
<tr>
<td>Total sent to the TDS HQ in England</td>
<td>307</td>
<td>220</td>
<td>291</td>
</tr>
</tbody>
</table>

Table 1: the numbers of donkeys relinquished to the care of The Donkey Sanctuary (Ireland) from each of four provinces, and the number sent to The Donkey Sanctuary UK headquarters (TDS HQ) in Devon in the years 2011, 2012 and 2013.
Figure 2: an illustration of the county-of-origin (grouped by province) of donkeys relinquished to The Donkey Sanctuary in 2011 (series 1 blue), 2012 (series 2 red) and 2013 (series 3 green).

Figure 3: donkeys in long-term sanctuary care at a base licensed and funded by The Donkey Sanctuary.
<table>
<thead>
<tr>
<th>Organisation</th>
<th>County based in</th>
<th>Amount €</th>
</tr>
</thead>
<tbody>
<tr>
<td>Animal Heaven Animal Rescue (AHAR) (works with a variety of species)</td>
<td>Kerry</td>
<td>16,000</td>
</tr>
<tr>
<td>Donegal Donkey Sanctuary (DDS)</td>
<td>Donegal</td>
<td>2,100</td>
</tr>
<tr>
<td>IHWT (works largely with non-donkey equines)</td>
<td>Wicklow</td>
<td>60,000</td>
</tr>
<tr>
<td>ISPCA Equine Centre (part of the additionally funded national ISPCA)</td>
<td>Cork</td>
<td>14,000</td>
</tr>
<tr>
<td>The Donkey Sanctuary Ireland (TDS)</td>
<td>Cork</td>
<td>87,000</td>
</tr>
<tr>
<td>Sathya Sai (additionally works with non-donkey equines)</td>
<td>Sligo</td>
<td>12,600</td>
</tr>
</tbody>
</table>

Table 2: The numbers of donkeys taken in and rehomed (as pets, to farmers for use on agricultural schemes and to other animal welfare groups, notably The Donkey Sanctuary) by selected organisations in the years 2011, 2012, 2013 and 2014.

Table 3: Ex-gratia funding (for 2015) by the Department of Agriculture, Food & the Marine (DAFM) of selected animal welfare charities involved (though not exclusively) with the rescue and rehoming of donkeys in Ireland.
Table 4: The numbers of donkeys placed into foster/rehoming care during 2011, 2012 and 2013 and the number of foster homes supervised by The Donkey Sanctuary (TDS) in 2013 in each of the four provinces of Ireland.

<table>
<thead>
<tr>
<th>Province</th>
<th>Number of donkeys placed into foster care by The Donkey Sanctuary (TDS)</th>
<th>Number of TDS foster homes in 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2011</td>
<td>2012</td>
</tr>
<tr>
<td>Munster (six counties)</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Leinster (12 counties)</td>
<td>15</td>
<td>22</td>
</tr>
<tr>
<td>Connacht (five counties)</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Ulster (nine counties)</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Total (32 counties)</td>
<td>29</td>
<td>32</td>
</tr>
</tbody>
</table>

References

Chapter 5
Investigation of the equine infectious disease threat from donkeys at mixed equestrian events in Ireland

Abstract

Background

The number of abandoned or otherwise neglected donkeys has significantly increased in Ireland in the recent past. The real or perceived capacity of the donkey to act as a reservoir of equine infectious disease, and thus pose an increased risk of disease transmission to horses and ponies, may be a factor in this increased abandonment and neglect. The authors here report on a field study exploring the infectious disease transmission threat the donkey poses to the general equine industry in Ireland through an examination of biosecurity standards and the views of horse and donkey exhibitors at nine mixed equestrian events in 2014. Quantitative information was gathered via the organising committee (if any) and through an examination of facilities and procedures. Qualitative information was gathered using a semi-structured questionnaire to ascertain the view of exhibitors regarding the keeping of donkeys and any infectious disease transmission risks posed.

Results

At eight of nine events visited there were no entrance controls, no veterinary examinations, no enforcement of legislation regarding equine identification and equine premises registration and no isolation facilities on site for equids. Contact between donkeys and other equids was largely uncontrolled. Exhibitors had travelled from abroad to one event. Exhibitors generally opined that they did not perceive the donkey to represent any additional infectious disease transmission threat above that posed by other equids; there was however a general sense that donkeys were less well regarded for other reasons including nuisance and uselessness.

Conclusions

When biosecurity controls are not in place (or enforced) to actually check passports, verify identification and equine premises registration, mixed equestrian events may unwittingly act as the mechanism of spread of endemic and potentially more seriously
exotic equine infectious disease. Donkeys were not generally considered by equine exhibitors at mixed events in Ireland to represent a heightened reservoir of disease or to pose an increased risk of transmission of contagious disease suggesting that other factors should be considered more important when studying the incidence of abandonment and neglect.

Background

In the recent past, in particular with the economic decline seen in Ireland since 2007, the number of abandoned or otherwise neglected donkeys has significantly increased. By way of example, over 1,400 donkeys are currently in the care and stewardship of The Donkey Sanctuary, based in Co Cork (N Carton, 2014 Donkey Sanctuary Ireland personal observation): approximately 1,100 on managed farms and some 350 spread among foster homes on the island of Ireland mostly as bonded pairs. This is despite sending an average of over 270 donkeys to The Donkey Sanctuary in GB annually in recent years from the 32 counties of Ireland. Comparable figures for Ireland for 2008 were fewer than 400 donkeys on managed farms and 485 in foster care. The Donkey Sanctuary (Ireland) acquired over 400 new donkeys requiring care in 2013 and the seemingly ever-growing population of neglected, abandoned and relinquished donkeys in Ireland has become a growing cause for concern and discussion vis a vis their origin, why they are bred or kept, and in particular why they are being relinquished in large numbers in recent years.

The donkey’s capacity to act or perception as acting as a reservoir of equine infectious disease may be of relevance to this discussion amongst those in the general equine industry, particularly where equine husbandry and care standards are low. Collins et al [1] reported on threats to equine welfare in Ireland highlighting (among other issues) the potential for the transmission of contagious disease at equestrian events where there is little enforcement of identification of equidae legislation and variable, often poor, standards of biosecurity. Subsequently demographic data regarding the numbers of unwanted equidae including donkeys in Ireland has been compiled [2]. There is a link between the incidence of unwanted, poor value equidae, the neglect of these animals’ health needs (including vaccination and deworming) and the threat of the spread of
contagious disease at equine events where good biosecurity standards and traceability are lacking. The risk of transmission of contagious disease at unregulated equine events is of immediate relevance with regard to the spread of endemic viral, bacterial, parasitic and fungal infections but would also be of critical concern in the instance of an outbreak of an exotic or listed disease which would prove a threat to the entire equine industry.

While donkeys show similar clinical signs to horses of equine herpesvirus, equine influenza virus and Strangles (Streptococcus equi var equi) infection [3, 4] donkeys are known to be less severely affected clinically by diseases such as Equine Viral Arteritis (EVA) [4] and asymptomatic carriers of other endemic diseases such as lungworm (Dictyocaulus arnfeldi) [5]. Of further concern is the subclinical or asymptomatic nature of infection of donkeys with critical exotic diseases including Equine Infectious Anemia (EIA), African Horse sickness (AHS), Piroplasmosis (Theileria equi) and Trypanosoma equiperidum (the agent of Dourine) [4,6,7]. For EIA, it is of note that when testing using the AGID or Coggins test, antibodies for EIA show up later in donkeys then in horses [4]. For AHS it is of note that even when vaccinated, donkeys may act as a reservoir for disease [4]. A recent qualitative risk assessment carried out by the Irish Department of Agriculture, Food and the Marine (DAFM) reported the risk of the incursion of African Horse Sickness into the Republic of Ireland by a legally imported equid to be ‘very low’; however, the risk associated with illegal importation of equidae or their products was reported as ‘very difficult to quantify’ [8]. Continued vigilance in Ireland with regard to arthropod-borne (currently exotic) diseases such as AHS is urged [9].

The authors here report on a study employing a combination of quantitative and qualitative research methodologies to explore the threat the donkey poses as a reservoir of infectious disease to the general equine industry in Ireland through an examination at mixed equestrian events of:

- Biosecurity standards, via an assessment of
  - requirements for entry to event classes and entrance to the event premises;
  - compliance with relevant national legislation related to the identification
and keeping of equidae; of biosecurity procedures in evidence;
• observation of the clinical signs of equine ill-health;
• enquiry as to the place of origin of the exhibitors of equines.
• The perception among the exhibitors of donkeys regarding
  • donkeys as a significant biosecurity risk in the transmission of contagious equine disease to horses and ponies;
  • their experience of how donkeys and donkey keepers (DKs) are perceived.
• The perception among equestrian exhibitors in general regarding
  • the problems posed by the keeping of donkeys viz a viz other equidae;
  • their view of donkeys and DKs.

If donkeys are perceived to be a significant reservoir for equine contagious disease, or other significant problem by the general leisure and pleasure horse industry in Ireland, this perception may serve to increase the risk of abandonment and reduce the desire to foster thus driving up the numbers (needing to be) kept by donkey sanctuary organisations.

Methods

A schedule of equestrian events held during the summer months in Ireland was developed. Events to be visited were selected based on the following criteria:

• Historical attendance figures of donkeys
• The spectrum of horse/pony/donkey classes scheduled
• Geographical location and spread around the island of Ireland
• Occurrence during the summer months of 2014

Nine events throughout Ireland were subsequently visited by at least one, often two of the authors to gather information. They are named below in alphabetical order, but listed as events 1 to 9 in the results section in the order in which they were attended:

• Cahirmee Horse Fair, Co Cork
• Castlewellan Agricultural Show, Co Down
• Clonmel Show, Co Tipperary
• Cultra Donkey Day, Co Down
• Dublin Horse Show, Ballsbridge, Dublin
• Gort and District Show, Co Wexford
• Kilmancanogue Horse Show, Co Wicklow
• Mullingar Agricultural Show, Co Westmeath
• Newcastle West Show, Co Limerick

Biosecurity standards

A representative of the event organisers was contacted either in advance by telephone and/or email and/or at the event and asked to describe controls relevant to equine biosecurity:

• Pre-registration and/or onsite registration for horse/pony and donkey classes
• Event entry requirements – identification (passports, microchips), vaccinations etc.
• Entrance/exit control for horses/ponies/donkeys, and compared to other livestock if these present
• Veterinary personnel onsite and/or on call
• Territory of origin of exhibitors of horses, ponies and donkeys

The above were assessed during the visit by the researcher(s) to the event as well as an evaluation of:

• The numbers of donkeys and donkey exhibitors; how many donkeys they kept and whether they kept them with horses
• Contact at the event between horses and donkeys
• Sharing of equipment that might act as disease fomites
• Overall equine health/welfare standards on visual inspection
• Donkey Body Condition Scores (BCS) on a scale of 1=poor to 5=obese [4]
Donkey exhibitor views

Donkey exhibitors present at each event were approached and interviewed by one of the authors. The topics for discussion were set in the form of a semi-structured questionnaire as follows; however the interviewee determined the breadth and depth of material covered:

• General background regarding their interest in donkeys
• Their awareness and compliance with the requirements for donkey identification or any other legislative provisions
• Their reasons why they bred and/or kept donkeys
• Where they procured donkeys from if they didn’t exclusively breed them
• Their view of the health needs of donkeys including vaccination and de-worming
• Whether they experienced objections or prejudice by horse owners living near them or while attending mixed equestrian events

In general open questions were used to encourage discussion and engagement; closed questions were used to clarify particular items.

Equine exhibitor views

Horse/pony keepers (HKs) greatly outnumbered donkey keepers (DKs). Both were questioned on a random, ad hoc basis as the running of the event and classes permitted. They were asked about:

• General background equestrian matters
• Their perception of donkeys as a source of diseases potentially contagious to horses
• If a HK, whether they experienced or held a prejudice against donkeys and/or those who kept them (DKs), and whether they objected to donkeys being kept near them or attending mixed equestrian events
• If a DK, whether they experienced prejudice against donkeys and DKs
• Problems with the keeping of donkeys
• The value of donkeys

These views were collated and analysed for global, organising and basic themes [10].
Table 1: A summary of quantitative data gathered at mixed equestrian events in Ireland. The nine events are listed in the order in which they were visited in the summer months of 2014.
Results

Biosecurity standards: the findings are summarised in Table 1.

Registration requirements

At eight out of nine events, pre-registration was required of the entrants to at least some equestrian classes; five events allowed on-site registration to selected classes e.g. showing classes but not show-jumping classes; one event did not have any entry requirements of any type for horses, ponies or donkeys.

Biosecurity procedures in evidence

Entrance controls at eight out of nine events were non-existent: anyone with a horsebox or livestock trailer was let into the horsebox car park and subsequently onto the show ground. At these eight events, no veterinary examinations were conducted on animals upon arrival; at five of these eight events, veterinary personnel were present on-site or available on call. None of these eight had isolation facilities; nor were there hand-washing or boot-dipping facilities.

Horses and donkeys were contained in the same areas at seven events while waiting for their classes, either in stables or horseboxes parked side-by-side and twice observed in the same horsebox. Show rings were placed immediately adjacent to each other at three events, so contact between horses and donkeys was easily made (see Figures 1 and 2). At six events, there was sharing of grooming equipment, feed/water buckets, and rugs between donkeys and horses.

One event (event 8) stood in contrast to the others with regard to biosecurity measures: strictly enforced pre-registration requirements; entrance/exit controls; a veterinary presence on-site; checking of documents and vaccination details; and examination of equidae for clinical status on arrival.
Compliance with legislation regarding identification and premises registration

The organisers of seven events stated that they required passports to be provided on the day, and at three of those events, equine premises registration was stated as being a requirement to make an entry to an equestrian class. Two events did not require any passport or other identification information for the equines pre-entered for classes and one organiser stated that “some horses were hired for the day and so the competitor making the entry might not have access to that information”. Three events did not require passport and microchip information for donkeys as these were regarded as “livestock”, not equines. At eight out of nine events, even when equine passports and microchips were required for pre-registration, there was no verification of these documents or details on the day by event organisers or their representatives.

Evidence of clinical signs of equine contagious disease

The animals at all but one event appeared in good health and ideal to fat body condition (Body Condition scores of 3 and 4 respectively). At event 4 three donkeys were obese (BCS 5/5); poor coats, skin lesions, overgrown hooves, nasal discharge, and evidence of scour in two animals were also identified (see Figures 3 and 4).

Territory of origin

Details of the territory of origin of persons exhibiting horses, ponies or donkeys at one event are presented in Table 2. The place of origin (and identity) of equestrian exhibitors at the other eight events studied could not be verified as pre-registration was not mandatory for all classes and entry controls were not in place or enforced. However organisers stated that exhibitors were from the island of Ireland.

<table>
<thead>
<tr>
<th>Event 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travelled from:</td>
</tr>
<tr>
<td>Republic of Ireland</td>
</tr>
<tr>
<td>Northern Ireland</td>
</tr>
<tr>
<td>Great Britain</td>
</tr>
<tr>
<td>Continental Europe</td>
</tr>
<tr>
<td>North America</td>
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</table>

Table 2: The number of exhibitors of equids and their territory of origin at Event 8.
Figure 1: Leading donkeys with horses in the adjacent show ring at Event 2.

Figure 2: A driving donkey with horses in the adjacent show ring at Event 3.
Figure 3: Photograph of a donkey showing evidence of nasal discharge at Event 4.

Figure 4: Photograph showing evidence of poor donkey hoof care at Event 4.
Donkey exhibitor views

Compliance with legislation regarding equidae

Most of the DKs interviewed said that they had passports and microchips for all of their donkeys, but there was no evidence presented to the interviewer at any event to this effect. Two DKs said that donkeys were “not required to have microchips or passports”.

Reasons for breeding and keeping donkeys

Only six out of 22 keepers of donkeys (DKs) interviewed said that they still bred their donkeys. Most reported that they kept their donkeys for showing, the next most popular reason for keeping donkeys was driving (Figure 1), followed by donkey derby racing and, finally, one owner claimed to do agility classes with her donkeys. One DK opined that people kept donkeys for three reasons: “nostalgia, as a companion for a horse, or they really love donkeys”. Others expressed the view that people procured them as “lawnmowers” and “companions” and as “livestock units for subsidy payments” or a potential way to “make a quick few quid”. Five DKs kept horses alongside their donkeys and found they “got along quite well”.

Procurement of donkeys

Some DKs had imported donkeys from Spain and France (see Figure 5) into Ireland and subsequently moved them around the island exhibiting the different breeds of donkey.

Figure 5: Imported Poitou French breed donkey photographed at Event 3.
Routine husbandry of donkeys

At one event, where clinical signs of disease were observed in donkeys, two exhibitors (of diseased donkeys) said that “donkeys do not need any health care”. Other DKs interviewed said they took good care of their donkeys and ensured that their vaccinations, de-worming, farriery and dentistry were kept up to date.

Equine exhibitor views

Within this overarching or global theme can be found several organising themes, illustrated graphically in Figure 6:

1. That related to how the keepers of donkeys (DKs) perceive donkeys as a disease risk
2. That related to how the keepers of horses (HKs) perceive donkeys as a disease risk
3. That related to other risks or problems associated with the keeping of donkeys
4. The general perception of donkeys by HKs
5. Issues related to the value of donkeys

Figure 6: A graphic illustration of themes as articulated by equine exhibitors at mixed equestrian events. Global themes are in rectangular text boxes with straight edges, organising themes in rectangular text boxes with rounded edges, and basic themes in oval text boxes.
DK opinion of the donkey as a source of contagious equine disease

As a basic theme, all but one donkey owner said that they did not see transmissible disease in the donkey: on closer questioning most felt that the donkey was more “hardy” or more “stoic” rather than more “resistant”. A second basic theme related to the greater awareness of the potential for parasitic disease most notably lungworm (nematode strongyles) and liver damage due to fluke infestation (trematodes), and on occasion tetanus (non-contagious bacterial infection). As a balancing basic theme the view was expressed that donkeys might “clean-up” rough pasture reducing the incidence of certain diseases for example those transmitted by ticks such as “Red-water” (Babesia) or by consuming parasite eggs.

HK opinion of the donkey as a source of contagious equine disease

The core basic theme identified was that most of the HKs interviewed did not view donkeys as a reservoir for disease and thus had no issue with them being kept with their horses. Only one HK said they would not share grazing with a donkey due to concerns about lungworm. One HK questioned said she knew donkeys could get “strangles” (Streptococcus equi var equi contagious bacterial disease) although she had never witnessed it.

Problems with the keeping of donkeys

A key basic theme identified was the negative perception of the keeping of donkeys: multiple DKs opined that HKs often “looked down upon them” for owning donkeys as an inferior animal and laughed at the idea of “showing donkeys”. It was said that it was often the “fly-by-nights” (recent entrants to the competitive equestrian scene) that were the most judgmental of DKs, they opined. It was said that the donkey was considered the “poor man’s horse” and that often HKs considered donkeys to be “mutts” and not to have any useful purpose. One judge (of a donkey showing class) felt that HKs’ main complaint (apart from lungworm) was that horses are often spooked by donkeys and this was a basic theme echoed by many DKs: donkeys were perceived to be a “spooky”, “noisy”, “stubborn”, “eat horses’ tails” and a general nuisance.
Actual perception of donkeys by HKs

In questioning HKs at the events, the key basic themes identified were that the majority had either not considered or were not concerned about donkeys (as reservoirs of equine infectious disease) either specifically at the equestrian events or in general. None of the HKs questioned seemed to mind donkeys being present at the shows and didn’t take much notice of them being there. On closer questioning, themes echoing the views of DKs emerged: horses could be “easily spooked by donkeys”; often due to the “length of their ears” and sometimes due to the “noise they make”. Although they saw no use for donkeys, many thought they were “cute” and “no threat to their horses”.

The value of donkeys

An example of a recurring basic theme, was the keeping of donkeys as “land units” to claim on subsidies. Donkeys were generally regarded as “easy to keep” but “valueless” in themselves and thus often meriting little care. They might also be kept by some as “companions” or “lawnmowers”.

Discussion

Apparent compliance with the identification of equidae legislation was quite high among the keepers of donkeys (DKs) interviewed as exhibitors at equestrian events: the majority reported having passports for their donkeys and having had them microchipped. However, no passports were offered or made available for examination at any time during the study. Two DKs stated, however, that the law in Ireland did not require passports and microchipping for donkeys as it did for horses. The fact that these same two DKs also believed that donkeys did not require other routine health care provisions either, indicates a lack of awareness of basic healthcare and maintenance requirements of donkeys and lack of awareness of the relevant legislation regarding the identification of donkeys; this view was not replicated in conversation with other DKs. The majority of DKs reported that they kept their donkeys up to date
on vaccinations, with appropriate de-worming, farriery, and dentistry care. However, no evidence beyond the healthy appearance of the donkeys was available and this view may be indicative of only the sub-set of persons exhibiting donkeys rather than the general donkey-keeping population.

At eight out of nine shows visited across the island of Ireland, no credible control or bio-security measures were in place or enforced that might prevent the spread of contagious disease. Passports and microchip numbers were required to register for most, but not all, of the events visited. Onsite however, the documentation was not checked and anyone with a horsebox was let onto the fairgrounds. Veterinary examination of equines for identification or clinical status upon entering the show-grounds was performed at only one of nine events, and thus a sick donkey or horse might easily enter any of the other premises with resultant risk to other equines. In fact, donkeys in poor health were seen at one of the events visited in this study. The uncontrolled mixing of un-examined donkeys and horses from unknown backgrounds at these events is the perfect medium for disease transmission. Endemic diseases such as respiratory and intestinal viruses and bacteria, and fungal skin infections can spread with ease from infected horses, ponies or donkeys in close contact with other equidae or where equipment is shared. In Ireland, the greatest threat to the horse population from sub-clinically infected donkeys is arguably lungworm, as donkeys are largely asymptomatic and can act as a reservoir for the disease subsequently contracted by horses with clinical consequences. This transmission is unlikely to occur at equine events where horses and donkeys are not grazing for long periods together but may be an issue on the home premises. Other endemic transmissible equine diseases have similar clinical presentations in donkeys and horses although there is a perception as evidenced in this study that donkeys (as compared to horses) are more stoic, show fewer signs of disease and might thus act as reservoirs of same.

However, spread of contagious disease at unregulated equestrian events is particularly critical where donkeys (as for other equidae) are present that have been imported, as these may be asymptomatic carriers of a number of important exotic diseases. Some of the donkeys observed in this study had been imported from Spain and France and moved around Ireland to show at different events. Concern has been raised previously
by the authors as to the lack of a comprehensive system recording the movement of equidae within the Tripartite Agreement Zone of Ireland, the UK and France [11]. At one event attended there were equines from as far away as North America and there can be no guarantee, despite the excellent biosecurity measures in place, that animals incubating infectious disease and thus capable of disease transmission were not present.

For many exotic contagious equine diseases, donkeys are more likely than horses to be asymptomatic and are thus potential sources of infection to horses. If any such diseases were to be introduced into Ireland through the importation of sub-clinically infected donkeys/horses it could have devastating consequences for the equine industry here. It is also important to note that many diagnostic tests for these diseases have been validated for horses but not for donkeys, and thus all results, both positive and negative, should be regarded with caution. Similarly, vaccines against equine infectious diseases have only been tested on horses and thus both dosage and efficacy for donkeys is unknown [4].

Donkeys are not poorly perceived by the keepers of horses (HKs) as reservoirs of disease. It seems that while many HKs would not keep donkeys as they perceive them to have no real function or value, they also perceive them as benign and no great risk to their horses beyond a nuisance value. In fact it appears that both donkey keepers and horse keepers may underestimate the role of the donkey in the transmission of endemic contagious disease in that donkeys are as susceptible as horses to most of our endemic diseases.

Conclusions

The perception among the keepers of both donkeys and horses interviewed in this study is that donkeys do not pose any significantly increased threat to horses as far as infectious disease transmission is concerned. This is perhaps an underestimation particularly given the findings in this study regarding biosecurity procedures at mixed equestrian events. It seems that leisure and pleasure horse owners do not give much consideration to donkeys at all, thinking them to have “no practical use” and thus not
meriting much consideration. The perception “that donkeys are useless”, rather than any consideration of their role in disease transmission, may act as one driver for the currently low perceived worth of donkeys and thus increase the numbers that must be offered sanctuary by animal welfare organisations. In the authors’ view this possibility merits further consideration.

Equestrian events throughout Ireland pose a real risk for disease spread throughout the equine population due to the lack of and/or enforcement of biosecurity controls. Excepting acting as a reservoir of lungworm infestation, which is unlikely to be transmitted at equestrian events of short duration, donkeys do not pose any more risk to the horse population in Ireland than do horses, but their risk as carriers of contagious disease may actually be underestimated. The major threat that donkeys represent to the horse population is donkeys (as per other equines) imported in the absence of proper controls. The enforcement of identification regulations for all equines is fundamental in controlling the movement of equines throughout Europe and managing the spread of equine infectious disease. When biosecurity controls are not in place (or enforced) at equestrian events (particularly in the absence of rigorous importation controls) to actually check passports, verify identification and ensure compliance with the requirements to register equine premises, such events may unwittingly act as the mechanism for the spread of endemic and potentially more seriously exotic equine infectious disease.

Competing interest

The authors declare that they have no competing interests.

Authors’ contributions

JAC and VD conceived and designed the research study. SF conducted all field visits initially in the company of either JAC or VD and subsequently alone; SF conducted all data recording under the supervision of VD. JAC performed the analysis of data. SF wrote the initial manuscript drafts which were reworked by JAC and VD. All authors read and approved the final manuscript.
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Authors

Sarah Finney* (sarah.finney@ucdconnect.ie), Joseph A Collins** (collinsjoe.collins@gmail.com), Vivienne Duggan* (vivienne.duggan@ucd.ie)
*School of Veterinary Medicine, University College Dublin, Ireland; **Deerpark Veterinary Services, Castlelyons, Co Cork, Ireland.

*These authors contributed equally to this work

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Amongst other words the President of Ireland, Michael D Higgins, has written in The Ass (2011):

*I recall the soft velvet of his ears,*
*as he bent in habit for the winkers,*
*the resignation too of his taking the bit*
*past the surrender of his yellow teeth.*
*The cross upon his back conferred no sacred status,*
*more a reminder of a burden carried,*
*nor did it guarantee the paring of his hooves...*
*More than an image lost it is a companion I seek to recover.*

Introduction

Qualitative methods have gained recognition in domains traditionally inclined to a more quantitative approach (Attride-Stirling 2001; Ritchie and Spencer 2002). Thematic analysis, as has been conducted on the qualitative data gathered in the questionnaire here, is a method for identifying, encoding, analysing and reporting patterns within qualitative data, which can be thought of as a bridge between the languages of quantitative and qualitative research (Boyatzis 1998). Braun and Clarke (2006) conclude that thematic analysis is a useful and flexible method for conducting qualitative research in and beyond psychology. The authors of the study reported here have previously employed qualitative methodology, including thematic analysis, in the field of equine welfare to complement a quantitative approach (Collins et al, 2010).

Materials and methods

32 invitations were issued to potential respondents identified as having expertise, knowledge and experience relevant to the issues identified by the research team during the course of a quantitative research project. Potential respondents were identified by the research team during the course of gathering data relevant to the health and welfare of donkeys across 32 counties in Ireland and as reported in an earlier
chapter in this report. Respondents were attributed to four groups corresponding with their primary role as regards donkeys:

A. Central and local government involved in policy development and implementation: eight invitees
B. Animal welfare organisations involved in rescue, sanctuary and rehoming of donkeys: ten invitees
C. Breeders, owners, fosterers and keepers of donkeys: six invitees
D. Service providers – veterinary, farriery, registration, advisory, advertising: eight invitees

Each invitee was provided with a background document (see Appendix 1) and invited to participate. Each invitee agreed in principle to contribute within an agreed timeline and the survey questionnaire was then issued to them. The questionnaire comprised questions that were developed by the research team following an initial analysis of the data gathered and the identification of key issues that might affect donkey welfare with a particular focus on the abandonment/relinquishment of no-longer-wanted donkeys. Questions (see Appendix 2 for full details) were organised under five section headings as below:

1. Background and general
2. Breeding, acquiring and disposing of donkeys
3. Disadvantaged Area Scheme (DAS) to be renamed as Areas of Natural Constraint, sometimes known as ‘Area Aid’ or ‘Headage’
4. Sanctuary/rescue/seizing/rehoming/foster
5. Solutions to the problem of unwanted donkeys

Four invitees did not make a submission by the time an extended deadline had passed. 28 responses in total were received: seven from Group A, eight from Group B, six from Group C and seven from Group D.

Basic themes within a given section were identified by examining each submission for answers to questions within that section of the questionnaire (in black) and noting
recurring threads. If a specific point was made in isolation by one respondent but never repeated by others it was not reported – i.e. each basic theme was based on there being more than one submission making a given point. To avoid reporting bias the submissions were examined in a different order for each of the five sections.

Basic themes (plain black text) were then grouped into organising themes within each of three global themes corresponding to sections two, three and four of the questionnaire. Each of these issues has also been the subject of quantitative study in this research project and is reported on in a separate chapter:

- Breeding and keeping donkeys
- Agricultural Aid Schemes and subsidies
- Seizure, sanctuary, rehoming and euthanasia

Basic themes from sections one (background) and five (solutions) were gathered as appropriate under these three global themes. Thematic networks were subsequently created and illustrated using RFFlow 5.04 for Windows (RFF Electronics, Loveland, CO, USA).

Results and discussion

Global, organising and basic themes are laid out in Tables 1, 2 and 3 as they correspond to sections two, three and four of the questionnaire. Responses to questions in sections one and five were integrated into the themes developed for sections two, three and four where considered relevant.

In section one of the questionnaire, respondents generally agreed that donkeys were not native but introduced into Ireland largely in the late Middle Ages and are not naturally suited to the Irish climate and conditions – for reasons variously related to their lack of waterproofing, their elastic hooves prone to overgrowth in soft underfoot conditions, the lush grass on which they may be set to graze and to the lack of physical work (agriculture and transport) now remaining for donkeys to undertake. Donkeys’ value was described in terms related to economics (as an aid to transport
and agricultural practices in the past; for grazing and maintaining marginal lands; and for use on Area Aid Schemes), social (companionship and therapy for humans e.g. the very young and the elderly and equines e.g. weaning foals) and cultural (status in a peer group, their Christian religious significance and pagan superstition).

In section two, three and four (examined thematically) respondents provided informed views of the current position, problems, key drivers and potential solutions to improve the welfare of donkeys in three critical areas: breeding/keeping/disposing of donkeys; use of donkeys on Area Aid Schemes; and seizure/rescue and the subsequent fate of donkeys.

In answers to section two of the questionnaire, respondents described the key contribution that indiscriminate, unthinking, unlicensed and therefore uncontrolled breeding of donkeys plays in the later availability of no-longer-wanted animals not legally linked to a responsible person. Young unidentified, uncastrated male jacks are particularly vulnerable – they are not valuable (in comparison to the cost of identification and castration) and are therefore not valued. They are often instead neglected or abandoned in the knowledge that there is little enforcement of traceability standards as might exist for other livestock such as cattle and perhaps the sense as one respondent put it that “others will pick up the pieces”.

In section three, respondents outlined in detail the current role and welfare problems related to the use of donkeys in Area Aid (Disadvantaged Area) Schemes. There was general agreement that donkeys are vulnerable to poor care as they are widely perceived as “hardy”, “easy to keep on scrubland” and “units” to be kept with no required husbandry standards and no active inspections. Respondents were questioned about changes they might favour regarding donkey eligibility for the DAS (being renamed in its 2015 iteration as Areas of Natural Constraint – ANC). Although some opined that donkeys should be excluded entirely from agricultural aid schemes, most favoured a gradual phasing out of donkey eligibility over a period of several years with clear notifications to existing keepers and safeguards to protect the welfare of animals progressively viewed as a rapidly devaluing asset. A key concept that linked with concerns regarding indiscriminate donkey breeding was to restrict eligibility of male
adjusting the Livestock Unit value of donkeys (currently one LU per registered donkey),
setting a cap on the numbers of donkeys applicants enrol, incentivising the use of
rehomed donkeys, refusing any new applications (from persons not currently using
donkeys as LUs) and preventing existing applicants (who have donkeys) from enrolling
any new donkeys on the ANC scheme.

Section four of the questionnaire concerned the broad area of seizure, abandonment/
relinquishment and the subsequent fate of donkeys – sanctuary, foster/rehome and
euthanasia. Frequently this was described as necessary “fire-fighting” in an attempt to
ameliorate the “problem of excess supply over demand”. Frustration was evident in
the submissions regarding the many variations in the approaches adopted by different
government and non-government agencies to the seizure of donkeys. A particular
feature from a donkey welfare perspective was the concern expressed regarding the
potential that these variations might be exploited by persons more motivated by
profit than kindness and in a position to make profit from the impounding or rehoming
of animals. Conversely a more flexible approach to the fate of donkeys was generally
encouraged: that euthanasia be more readily considered for unrehomeable animals;
that more positive roles (potentially even incentivised eligibility for Area Aid Schemes
in the future) be found for rehomed donkeys; and that foster/rehome schemes focus
more on the needs of the donkeys and the people concerned, and on keeping these
needs more closely aligned than on the paperwork – such should remain the remit of
administrators not welfarists!

Section five of the questionnaire provided an opportunity for respondents to
add additional solution-focused comments not covered by the three immediately
preceding problem-based sections. Education of the keepers of donkeys regarding the
latter’s unique features as distinct from horses (on the one hand), and enforcement
of legislation and other strategies to control the breeding, keeping, identification,
castration and disposal of donkeys emerged as repeating refrains.
Conclusion

This qualitative study has provided an opportunity to explore key issues and concerns regarding donkeys in Ireland – their suitability, their care, their status and usefulness. It has provided information with regard to why donkey breeding continues in a largely uncontrolled and indiscriminate fashion, what roles donkeys might usefully fulfil within the wider equestrian community, why donkey welfare is compromised and why many have been relinquished into the care of welfare organisations in the recent past. It has provided particular pointers towards how donkey keeping for agricultural aid schemes may have contributed to a welfare problem and how eligibility criteria might be adjusted in future iterations of these schemes. It has provided suggested implementable solutions designed to manage (excessive) donkey production through controlled breeding and by saturating available places for donkeys rather than a continuous outlet for excess supply.

References

Appendix 1: background


This project aims to provide detailed information about standards of care for donkeys and problems related to the breeding, keeping, sale and disposal of donkeys in Ireland. The work is conducted by three vets - Dr Joe Collins in association with Dr Vivienne Duggan and Professor Paddy Wall of University College Dublin, School of Veterinary Medicine.

The first objective of this project is to obtain a profile of the donkey population in Ireland in the context of the equine and agricultural industries and this is well underway.

The second objective, which is specifically being addressed in this section of the project, is to assess common perceptions regarding the breeding/keeping, fostering and disposal of donkeys across these industries and

The research team have identified you as a person with key information and influence regarding the breeding/keeping, fostering or disposal of donkeys and would like you to engage with and provide perspective to this research project.

All views collected will be treated with absolute confidentiality and not reported in a manner that attributes them to the respondent. A synopsis of views will be provided to you.

If you agree, you will be asked your views under the following headings:

1. Cultural context and the importance of the donkey to Ireland
2. Breeding and owning/keeping donkeys in Ireland
3. Disadvantaged Area (Areas of Natural Constraint) Scheme
4. Sanctuary/rescue/seizure/rehoming of donkeys
We accept that not all will feel they have something to contribute under each heading; And finally we are interested in your opinion as to what drives (and thus what might practically be done to address) the issue of unwanted donkeys. The third project objective is to help direct the development of policy to address deficiencies in the safeguarding of donkey welfare: your views will greatly inform this process.

Appendix 2: questionnaire

Section 1: background and general

1. Do you understand the donkey to be native or introduced to Ireland? Do you see this species therefore as culturally important and/or naturally suited to living in Ireland? Are you aware of any particular superstitions related to donkeys, in particular regarding donkeys dying on a person’s property or in their care?

2. Do you see it as important that donkeys have positive roles/jobs and if so, why? What roles/jobs do you see currently and ones that might be developed for donkeys in Ireland?

3. Do you think that people should be permitted to own/keep donkeys without conditions or restrictions? If not, what restrictions or conditions do you believe should apply, for example: To the types, gender or numbers of donkeys? To the facilities (such as shelter) that must be provided? To the places (rural/urban, private/public/shared land etc.)? To the age, licensing or training of the owner/keeper?

4. Do you see positive benefits (for example, management of ‘poor’ land; disease control; companionship; profit) as well as potential harms (e.g. disease spread; land damage) in the keeping of donkeys?
Section 2: breeding, acquiring and disposing of donkeys

1. What do you believe are the main reasons why people breed donkeys?
   Do you think that breeding of donkeys is happening in an uncontrolled or random fashion? And if so why, what contributes to this?

2. What do you see as the main reasons why others (non-breeders) acquire donkeys?
   Do you think that many are imported -of a specific breed for example?
   How are most advertised, and sold?

3. What are the routes by which no-longer-wanted donkeys are disposed of do you think?

4. How is the legal requirement for microchip/passport of donkeys and registration of equine premises viewed by keepers of donkeys? Is it well accepted, largely adopted, enforced or is there a reluctance to be recorded as the breeder/keeper of donkeys? If there are weaknesses how might the situation be improved?

5. Do you think that donkeys (and those who keep them) are favourably perceived by the broader equestrian community:
   - In general?
   - In particular in relation to infectious disease including parasites?
   Do you know of any particular reasons there may be a bias against donkeys by the wider equestrian community?
   Do you know of positive reasons people might keep donkeys?

Section 3: Disadvantaged Area Scheme (DAS) to be renamed as Areas of Natural Constraint, sometimes known as 'Area Aid' or 'Headage'

1. Unlike horses, all types of donkeys (properly identified and registered) may be used as ‘livestock units’ for the purposes of calculating ‘stocking density’ on qualifying farms. Do you believe that this fits with the scheme’s declared aims of:
   - Ensuring continued agricultural land use, thereby contributing to the
maintain the countryside.
• Maintaining the countryside.
• Maintaining and promoting sustainable farming systems, which in particular take account of environmental protection requirements.

2. How do you believe that the production of donkeys is influenced by their potential use on the DAS?

3. Do you think that all holdings with qualifying donkeys should be inspected (annually)?
   • For minimum inputs (e.g. provision of shelter, hard-standing, water & fodder provision)?
   • And outputs (e.g. health and condition of donkeys)?

4. Do you believe that the DAS acts as a driver for the abandonment/relinquishment of unwanted donkeys?
   • Of any particular age, gender or type e.g. castrated or un-castrated males, large or small, particular coat colour, microchipped or not?

5. Do you believe that the terms of the DAS in relation to the inclusion of donkeys should be changed?
   If yes, do you believe that donkeys should be excluded entirely?
   And if so, when and how should this change be promoted and introduced, bearing in mind any potential unintended consequences?

6. If yes to change but no to complete exclusion, how do you think that the DAS should be changed?
   • In relation to specific types of donkeys?
   • Restricted to specific geographical areas?
   • Or types of farming enterprises only?
Section 4: sanctuary/rescue/seizing/re-homing/foster

1. What is your view of the concept of ‘sanctuary’ for donkeys – whereby a suitable home is provided to every donkey in need for as long as this is compatible with a ‘good life’?

2. Would you like to make any comment about your experience of the donkey sanctuary organisations – e.g. The Donkey Sanctuary (Cork), Sathya Sai (Sligo), An Asal (Wexford), Donegal Donkey Sanctuary?

Or other equine (including donkey) rescue/rehoming organisations e.g. the ISPCA (Longford and Cork), DSPCA (Dublin) and other SPCAs, IHWT (Irish Horse Welfare Trust, Wicklow), Hungry Horse Outside (Longford), AHAR (Animal Heaven Animal Rescue, Kerry)?

3. Do you feel that ‘sanctuary’ is the correct approach in comparison to a rescue/rehoming policy that may include euthanasia of (relatively) healthy donkeys – e.g. if deemed unre-homeable?

4. How do you view foster schemes for donkeys?
   Are donkeys in foster care as well cared for (worming, vaccination, nutrition etc.) as other equids on the premises or as well as donkeys at a sanctuary base?

5. Are the current fostering ‘rules’ of any particular organisation overly restrictive or do you see strict rules as being in the best interests of donkey welfare and thus appropriate?
   For example:
   Do you feel that a donkey can be equally content in the company of horses or do they need donkey company?
   How do you view any requirement for a fosterer to sign over their own donkeys (in case the return of fostered donkeys should prove necessary)?
   and any requirement to return the second of a pair (if one should die or have to return) to the fostering organisation?
Do you feel that donkeys must have access to man-made shelter and a hard-standing at all times or should a flexible approach be adopted?

6. How do you view the seizing/impounding of donkeys by Local Authorities or Department of Agriculture (DAFM)?
   Do you think that donkeys should be euthanized if not claimed (by the responsible owner/keeper) or made available for re-homing (to other persons) or that they should be offered to welfare/sanctuary organisations?
   Do you think there are financial rewards/penalties that influence the seizing, reclaiming, re-homing or euthanasia of donkeys, and if so are these any different than for horses/ponies?
   Do you think there should be any such incentives or penalties?

7. How do you view the export of ‘excess’ donkeys from Ireland – to sanctuaries or for fostering abroad?

8. Do you feel that any of these organisations (sanctuaries, welfare groups, central or local government authorities) contribute in any way to the production (and subsequent abandonment/relinquishment) of unwanted donkeys?

Section 5: solutions to the problem of unwanted donkeys

1. What in your view are the main drivers for the production of subsequently-unwanted donkeys and can you offer any practical solutions based on a knowledge of these?
   How might restrictions on the breeding/keeping of donkeys be implemented – e.g.
   • a licensing scheme?
   • Equine Premises inspections?
   • changes to the eligibility criteria (re donkeys) on DAFM-funded schemes? or
   • an enforceable requirement for education/training?

2. What in your view are the main reasons for the abandonment/relinquishment of
no-longer-wanted donkeys? Have you any specific proposal(s) to address the main reasons?

3. What in your view are the main reasons (if any) that rescue, re-homing or foster schemes may not operate to maximum effect to manage the problem of unwanted donkeys?
   For example:
   • A mismatch between supply and demand?
   • A perception that these donkeys are ‘second-hand goods’?
   • Terms/conditions too restrictive?
   • Paperwork and inspections too onerous?
   • Too ready availability of no-strings-attached options to purchase donkeys?

Can you suggest changes to rehoming or foster schemes that might increase their success or effectiveness?
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Nicky Holland
Hungry Horse Outside
The Donkey Sanctuary
Joe Collins
Equine Veterinary Services
collinsjoe.collins@gmail.com