

FORMAL SUBMISSION: THE FARRIERY WORKFORCE CRISIS IN SCOTLAND — URGENT PRE-LEGISLATIVE SCRUTINY REQUIRED FOLLOWING THE DEFRA VETERINARY SECTOR WHITE PAPER (CP 1615, 9 JULY 2026)

Dear Clerk,

I write to request that the Rural Affairs, Islands and Natural Environment Committee (RAINE Committee) undertake urgent pre-legislative scrutiny of the Scottish Government's preparedness for the incoming reform of veterinary regulation, as set out in the UK Government's White Paper 'Our Vision for a Thriving Veterinary Sector' (CP 1615, DEFRA, 9 July 2026), and to draw the Committee's attention to a fifteen-year policy failure with direct and measurable consequences for equine welfare in Scotland.

I am a Fellow of the Worshipful Company of Farriers (FWCF), a practising farrier, and a resident of Scotland. I have been engaged in a formal campaign to address the Scottish Government's failure to fund farriery apprenticeship training since the collapse of the cross-border reciprocal funding arrangement in 2017. I write now because a development of constitutional significance for this issue has emerged that makes parliamentary scrutiny both urgent and appropriate.

1. THE WHITE PAPER: WHAT IT MEANS FOR FARRIERY IN SCOTLAND

On 9 July 2026, the UK Government published the most significant reform of veterinary regulation in sixty years. The White Paper's farriery provisions are not peripheral — they are foundational:

KEY WHITE PAPER PROVISIONS AFFECTING FARRIERY

- Farriery is placed in the **FIRST TRANCHE** of professions regulated under the new framework — with veterinary surgeons and veterinary nurses.
- The Farriers (Registration) Act 1975 will be **REPEALED**.
- The Farriers Registration Council will be **ABOLISHED**.
- Farriers will be regulated under a new licence-to-practise system as Registered Allied Veterinary Professionals — **RAVP (Farrier)**.
- Practising farriery without a licence will remain a criminal offence under the new framework.
- The Scottish Government formally supported and consented to the DEFRA consultation underpinning this White Paper (January–March 2026).
- Scotland's Chief Veterinary Officer, Sheila Voas, co-signed the White Paper foreword.
- A draft Bill is anticipated to receive Parliamentary time in 2027.

2. THE SCOTTISH GOVERNMENT'S FAILURE: A FIFTEEN-YEAR RECORD

The White Paper would be a cause for straightforward welcome were it not for a structural problem unique to Scotland. The Committee is asked to note the following undisputed facts:

2.1 No Training Infrastructure Exists in Scotland

The only Scottish FRC-approved farriery apprenticeship training institution — the farriery department of Oatridge Agricultural College — ceased delivery around 2007 and formally closed in 2009. No replacement has ever been commissioned. Scotland's Rural College (SRUC) now operates the Oatridge campus, which hosts world-class equine facilities including the Scottish National Equestrian Centre and a £100,000 robotic training horse — yet no FRC-approved Level 3 apprenticeship in farriery exists there. SRUC currently offers only a pre-entry Level 2 certificate in forgework, which does not lead to FRC registration.

2.2 Funding Was Withdrawn and Not Replaced

Prior to 2017, an informal reciprocal agreement between the Scottish and UK Governments allowed Scottish apprentices to access funding for training at FRC-approved English colleges. In 2017, England's new apprenticeship funding rules ended that arrangement. The Scottish Government failed to negotiate an equivalent and failed to create a domestic alternative. Since 2017, Scottish farriery apprentices have been required to self-fund 100% of tuition and block-release accommodation costs while their counterparts in England and Wales have fees fully funded.

2.3 The Workforce Decline is Documented and Accelerating

The Farriers Registration Council has confirmed:

- There are approximately 168 registered farriers in Scotland, from a Great Britain total of 2,743.
- Scotland lost a net 36 registered farriers between 2020 and 2022 alone.
- The FRC has formally warned that 'owners in Scotland are experiencing difficulties accessing farriery services... raising significant concerns in respect of welfare.'
- Farriers north of the Central Belt are operating with fully closed books.

2.4 The Animal Welfare Consequences are Severe and Foreseeable

Farriery is not a discretionary service. Under the Animal Health and Welfare (Scotland) Act 2006, horse owners have a statutory duty of care that includes ensuring horses receive appropriate hoof care. Where no registered farrier is accessible, that duty cannot be met. The veterinary literature is unequivocal: hoof neglect causes laminitis (linked to over 7% of equine deaths in the UK), chronic lameness, skeletal degradation, and conditions that frequently require euthanasia on welfare grounds.

2.5 The Government Has Acknowledged the Problem and Done Nothing

A Scottish Government spokesperson confirmed to Horse & Hound in 2021 that the government would 'renew efforts to reinstate the previous reciprocal agreement.' In 2023 the same promise was made again. It is now 2026. No agreement has been reinstated. No domestic solution has been funded. A Freedom of Information request submitted on 25 June 2026 was refused by the Scottish Government on 15 July 2026 on the grounds that the volume of relevant correspondence was too large to process — an inadvertent admission that extensive internal discussion of this issue has occurred without any policy change resulting.

3. WHY PARLIAMENTARY SCRUTINY IS REQUIRED NOW

3.1 The White Paper Creates a Preparation Deadline

The incoming Veterinary Act will require all practising farriers to hold a licence under the new framework. Scotland currently cannot train new licensed farriers. If the draft Bill receives Parliamentary time in 2027, Scotland needs to begin building training capacity immediately to avoid a situation where the new regulatory framework comes into force in a jurisdiction that has produced no newly licensed farriers for approaching two decades.

This is not a hypothetical risk. It is a foreseeable and quantifiable outcome of existing policy, and it is one that the Scottish Parliament has the power to prevent.

3.2 The Scottish Government Consented to the Reform Without Addressing Its Implications

The DEFRA consultation ran from 28 January to 25 March 2026 with the Scottish Government's formal support and consent. The CVO for Scotland co-signed the White Paper foreword. The Scottish Government therefore endorsed a reform that will restructure farriery as a veterinary allied profession — while simultaneously maintaining the funding policy that prevents Scottish residents from training in that profession. The Committee is asked to invite the Scottish Government to explain this contradiction.

3.3 The RAINE Committee Has Direct Jurisdiction

The farriery workforce crisis falls squarely within the Committee's remit across multiple dimensions:

- Rural affairs — the crisis is most acute in rural and Highland Scotland, where horse ownership is concentrated and farrier access gaps are widest;
- Animal welfare — the Animal Health and Welfare (Scotland) Act 2006 is devolved legislation whose effective operation depends on an adequate farriery workforce.
- Natural environment — equine welfare is integral to Scotland's rural and agricultural landscape.
- Pre-legislative scrutiny — the incoming UK Veterinary Act will have significant implications for devolved animal welfare and skills policy that require Scottish parliamentary engagement.

4. WHAT I AM ASKING THE COMMITTEE TO DO

1. Write to the Cabinet Secretary for Rural Affairs requesting a written statement on the Scottish Government's plans to prepare Scotland's farriery workforce for the incoming veterinary regulatory reform, with a response deadline of 31 August 2026.
2. Write to the Cabinet Secretary for Education and Skills requesting confirmation of whether Skills Development Scotland will be directed to fund cross-border farriery apprenticeships for Scottish residents, and on what timeline.
3. Write to the Chief Veterinary Officer for Scotland, Sheila Voas, requesting her formal assessment of the equine welfare impact of the farriery shortage in Scotland, given her co-signature of the White Paper.
4. Consider holding a formal evidence session, inviting the Farriers Registration Council, Horse Scotland, BHS Scotland, World Horse Welfare, SRUC, and affected horse owners from rural Scotland, to establish the current scale of the access gap and its welfare consequences.
5. Consider requesting that the Scottish Government formally commit to a Scottish Farriery Workforce Plan aligned with the timeline of the incoming UK Veterinary Act, as a condition of the Scottish Parliament's consent to any legislative consent motion relating to that Act.

THE OPPORTUNITY

SRUC Oatridge already hosts the Scottish National Equestrian Centre and world-class farriery facilities, including a £100,000 robotic training horse.

A credible proposal for an FRC-approved Level 4 apprenticeship in farriery has been developed by Scottish farriery professionals.

The incoming veterinary regulatory reform creates a natural policy window: Scotland can position itself as a leader in the new veterinary allied professional framework rather than arriving at its implementation with no domestic training infrastructure.

The cost of establishing a training programme is modest relative to the cost of continued welfare decline and the legal exposure arising from inaction.

I am available to give oral evidence to the Committee at any time. I can also provide the Committee with the detailed legal correspondence submitted to the Scottish Government and the FOI documentation that has been gathered to date.

I am grateful for the Committee's consideration of this submission and urge it to treat the matter with the urgency it deserves.

Yours faithfully,

Neil Madden FWCF

Key sources: DEFRA White Paper CP 1615 (9 July 2026) | Animal Health and Welfare (Scotland) Act 2006 | Farriers (Registration) Act 1975 | FRC Register Data 2022 | Horsescotland Manifesto 2021–2025 | Horse & Hound reporting (2021, 2023) | Scottish Government FOI response 202600524195 (15 July 2026)

PROPOSED REMEDY FRAMEWORK

Rebuilding Scotland's Farriery Training Pipeline: A Three-Stage Approach to Workforce Recovery and Veterinary Alignment

Submitted in support of Formal Legal Notice to Cabinet Secretary Gillian Martin MSP

EXECUTIVE SUMMARY

This document sets out a practical, evidenced, three-stage framework for rebuilding Scotland's farriery training pipeline following fifteen years of policy failure. It is submitted alongside a formal legal notice to the Cabinet Secretary for Climate Action and Rural Affairs as a constructive remedy proposal — demonstrating that viable solutions exist which the Scottish Government has the power to implement, and that this legal campaign is motivated by a desire to solve a real and measurable problem.

The proposal is grounded in a frank and precise assessment of how farriery training actually works in Great Britain, why a standalone Scottish college is not viable in the short or medium term, and why that impossibility is itself a direct consequence of the Scottish Government's own inaction. It then sets out the only practical path forward — a three-stage programme beginning with immediate cross-border funding, progressing through a blended academic partnership with an established English college, and culminating in a fully Scottish programme aligned with the incoming veterinary regulatory framework.

1. HOW FARRIERY TRAINING WORKS: THE DUAL-TRACK MODEL

Before any honest assessment of remedies can be made, it is essential to understand precisely how farriery apprenticeship training is structured across Great Britain. There are two entirely separate and distinct elements, which operate in parallel but draw on completely different resources:

1.1 The Workplace Training Track — Approved Training Farriers (ATFs)

The practical, day-to-day training of farriery apprentices is delivered in the workplace by Approved Training Farriers (ATFs) — qualified, experienced, FRC-approved practitioners who take on apprentices within their own independent businesses. The ATF teaches the apprentice on the job: shoeing horses, managing clients, handling difficult animals, working in all conditions. This is where the craft is learned.

ATFs are entirely independent practitioners. They are not employees of any college or training institution. They run their own businesses and train apprentices as a professional obligation and commitment to the future of the trade. In Scotland today there are 7 ATFs. Each is affiliated to one of the three FRC-approved colleges in England — Myerscough College, Herefordshire and Ludlow College, or Warwickshire College — for the academic and block-release elements of their apprentices' training.

The workplace training track in Scotland therefore functions. Seven ATFs are ready, willing, and approved to take on apprentices. The barrier is not the ATFs. The barrier is that their apprentices must currently self-fund 100% of the college affiliation fees and block-release accommodation costs. Remove that financial barrier — by directing SDS to fund cross-border college affiliation — and Scotland's 7 ATFs can immediately begin producing newly registered Scottish farriers.

THE ATF FUNDING FIX — SIMPLE, IMMEDIATE, SUFFICIENT AS A FIRST STEP

What is needed: SDS funds the college affiliation and block-release costs for Scottish-resident apprentices at the three FRC-approved English colleges.

What this requires: A Ministerial direction to SDS. No primary legislation. No new infrastructure. No new staff.

What this achieves: Scottish apprentices can immediately begin fully funded workplace training with Scotland's 7 ATFs, affiliated to an English college for block-release and assessment. First newly registered Scottish farriers produced within 3–4 years.

Cost: Approximately £7,000–£10,000 per apprentice per year in tuition and accommodation support. For 4–8 apprentices per year — a realistic initial cohort — total annual cost is approximately £28,000–£80,000. This is less than the legal costs the Scottish Government will incur if this matter reaches the Court of Session.

1.2 The College Track — Academic Lecturers and Block-Release Delivery

The second and entirely separate element of the apprenticeship is the academic and block-release programme delivered at an FRC-approved college. This requires college-based staff — academic and practical lecturers in farriery who work within the college environment, deliver the theoretical curriculum, assess apprentices during block-release periods, and maintain the FRC-approved programme to the standards required for registration.

This is a completely different role from that of an ATF. College lecturers are not independent practitioners training one or two apprentices in their own businesses. They are academic professionals delivering a structured curriculum to multiple cohorts simultaneously, within a college environment, under FRC quality assurance requirements. The skills, qualifications, and commitment required are distinct from — and additional to — those of a practising ATF.

In Scotland today the pool of farriers with both the academic qualifications and the practical experience to serve in this college lecturing role is extremely small. Those who could potentially fill it are almost exclusively senior practitioners in the later stages of their careers who are running established independent businesses. This creates a structural trap of the most serious kind — and one that is entirely of the Scottish Government's own making.

THE CATCH-22 THE SCOTTISH GOVERNMENT HAS CREATED

THE COLLEGE STAFFING PROBLEM:

The small number of Scottish farriers academically and practically qualified to lecture at an FRC-approved college are senior practitioners running independent businesses. Many are approaching retirement. They represent, in their active practice, a critical part of the already-depleted registered farriery service in Scotland.

THE FIRST EDGE OF THE SWORD:

If any of these practitioners gave up their independent practice to take up a college lecturing role at SRUC Oatridge, Scotland would immediately lose one of its most experienced registered farriers from the active workforce. Their clients — horses across their region — would lose access to a registered farrier. The welfare gap the college is meant to address would be deepened at the very moment the college begins trying to close it.

THE SECOND EDGE OF THE SWORD:

Those same practitioners are approaching retirement. Even if one or two could be persuaded to move into lecturing, the window of availability is short and the succession problem would recur within years. A college programme built around one or two late-career practitioners is not a sustainable solution. It is a deferred version of exactly the same problem that caused the Oatridge closure — a programme dependent on individuals, with no resilience and no succession plan.

THE CONSEQUENCE:

A standalone Scottish college is not merely difficult to establish. In the short to medium term it is actively counterproductive. It would take experienced practitioners out of the field, deepen the welfare gap, and create a new single-point-of-failure programme that would face the same collapse risk as Oatridge within a decade.

THIS IS NOT BAD LUCK. IT IS THE DIRECT CONSEQUENCE OF FIFTEEN YEARS OF INACTION.

Had the Scottish Government funded cross-border apprenticeships continuously since 2009, Scotland would by now have a cohort of experienced practitioners in their thirties and forties — people with the years ahead of them to transition into academic roles without removing themselves from a desperate workforce. That cohort does not exist. The government's inaction created this trap, and the government's preferred solution — open a Scottish college — cannot escape it.

2. THE OATRIDGE PRECEDENT: WHY HISTORY MUST NOT REPEAT ITSELF

The history of the Oatridge farriery programme is directly relevant to any proposal for future Scottish provision and must be understood clearly.

The farriery department at Oatridge Agricultural College depended critically on its senior lecturer, Steven Gowen. When Mr Gowen was placed in an untenable position — expected to sustain a nationally significant, legally regulated professional training programme without adequate staffing support, succession planning, or institutional investment — the programme became dependent on a single individual with no resilience. When he could no longer continue, the programme collapsed. There was

no replacement. There was no contingency. Seventeen years later, there is still nothing.

The lesson is not that a Scottish college is impossible in principle. It is that a Scottish college built on the same single-practitioner model, drawing from the same small pool of near-retirement senior farriers, will face exactly the same collapse risk within years of opening. The structural conditions that caused the Oatridge failure have not improved. They have worsened. The pool of potential academic staff is smaller now than it was in 2009, and those who remain in it are closer to retirement.

Any proposal for future Scottish provision must therefore be built on a model that does not replicate this structural fragility. The blended partnership model proposed in Stage 2 below is specifically designed to avoid it — by drawing on Myerscough College's established, multi-staffed academic programme rather than attempting to recruit a Scottish academic cohort that does not currently exist in sufficient numbers.

3. THE THREE-STAGE REMEDY FRAMEWORK

STAGE 1 — Immediate Cross-Border Funding

Timeline: 0–12 months — operational by 1 January 2027

The immediate and only currently available remedy is the funding of Scottish-resident farriery apprentices at the three FRC-approved colleges in England — Myerscough College (Lancashire), Herefordshire and Ludlow College, and Warwickshire College — to cover college affiliation fees and block-release accommodation costs.

This works within the existing dual-track model: Scotland's 7 ATFs continue to deliver workplace training in their own businesses as they do now. What changes is that their apprentices are no longer required to self-fund the college track. SDS funds the college affiliation and block-release costs, exactly as happens for apprentices in England and Wales.

No new infrastructure is needed. No new staff are needed. No new college approval is needed. The ATFs are already approved. The English colleges are already approved. The only missing element is the funding — and that requires nothing more than a Ministerial direction to SDS.

This is the single most urgent action available to the Scottish Government and the one that can be taken immediately. Every month of further delay is another month in which Scotland's 7 ATFs cannot viably take on new apprentices, and another month in which the net decline in Scotland's registered farrier numbers continues.

STAGE 2 — Blended Partnership — SRUC Oatridge and Myerscough College

Timeline: Years 1–5 — first cohort enrolled by 2028

While Stage 1 funding produces Scotland's next cohort of registered farriers through the existing dual-track model, Stage 2 begins the longer-term work of establishing a

Scottish academic presence in farriery training — without replicating the structural fragility that caused the Oatridge collapse.

The blended partnership model works as follows:

SRUC Oatridge develops a formal institutional partnership with Myerscough College. Under this arrangement, Myerscough's established academic staff continue to deliver the theoretical curriculum and formal block-release assessment — drawing on Myerscough's experienced, multi-staffed lecturing team and its FRC-approved programme infrastructure. SRUC Oatridge contributes its world-class equine facilities — the Scottish National Equestrian Centre, the robotic training horse, and the existing forge facilities — for practical elements of block-release delivery, reducing travel demands on Scottish apprentices.

SRUC's existing pre-entry Level 2 forgework certificate becomes the formal Scottish entry pathway into the blended apprenticeship, creating a domestic feeder programme that identifies and prepares Scottish candidates before they enter the full apprenticeship.

Critically, this model does not require SRUC to recruit a full complement of Scottish farriery academic staff from the outset. It draws on Myerscough's existing team for the academic core, while building Scottish practical delivery capacity incrementally as the partnership matures. No experienced Scottish practitioner is asked to give up their business to staff a college that cannot yet support itself — the Oatridge trap is avoided by design.

As the blended programme begins to produce graduates, and as Scotland's registered farrier numbers recover through Stage 1 funding, the pool of potential future Scottish academic staff will slowly grow. Stage 2 plants the seeds of Stage 3 without demanding that those seeds exist before the ground is prepared.

STAGE 3 — Fully Scottish Programme — Aligned with the New Veterinary Act

Timeline: Years 5–10 — full domestic capability by 2032–33

As the blended programme matures and Scotland's registered farrier numbers recover, SRUC Oatridge progressively develops its own academic farriery capacity — recruiting from the growing cohort of experienced Scottish practitioners produced by Stages 1 and 2, some of whom will in time be at a career stage where a transition into part-time or full-time academic roles is feasible without fatally depleting the active workforce.

The programme is recredited under the new RAVP (Farrier) licence-to-practise framework established by the incoming Veterinary Act, with SRUC Oatridge positioned as one of a small number of approved providers across Great Britain.

A Scottish Farriery Workforce Plan — produced by the cross-sector working group called for in the legal notice — sets regional targets for registered farrier numbers across Scotland's council areas, with particular priority given to Highland, Moray, Aberdeenshire, Dumfries and Galloway, the Scottish Borders, and Argyll and Bute, where access gaps are most acute.

By the end of Stage 3, Scotland has a domestically delivered, government-funded farriery training programme producing registered practitioners annually, with a sustainable succession pipeline that does not depend on the continued willingness of a handful of near-retirement senior practitioners to hold the entire system together.

4. WHY MYERSCOUGH COLLEGE IS THE NATURAL PARTNER

Of the three FRC-approved colleges in England, Myerscough College in Lancashire is the most appropriate partner for Stage 2 for the following specific reasons:

- Scale and staffing resilience — Myerscough is the largest FRC-approved farriery training provider in Great Britain with a multi-staffed lecturing team. A partnership with Myerscough does not replicate the single-point-of-failure model that caused Oatridge's collapse.
- Geographic accessibility — Lancashire is significantly more accessible from Scotland than Herefordshire or Warwickshire, reducing block-release travel burden on Scottish apprentices and their ATFs.
- Existing Scottish connections — a number of Scottish farriers have trained at Myerscough and the college has existing familiarity with the Scottish equine sector, providing a natural foundation for a formal institutional partnership.
- Alignment with the incoming RAVP framework — Myerscough's established programme and academic infrastructure position it well to transition to the new RAVP (Farrier) licence-to-practise framework, ensuring the blended programme remains nationally recognised throughout the legislative transition.
- Complementary facilities — Myerscough's equine department is one of the most respected in England. A formal partnership with SRUC Oatridge — which has comparable practical facilities and the SNEC — creates complementarity rather than duplication, and gives the blended programme a genuinely distinctive character.

5. COST AND VALUE

ESTIMATED COSTS BY STAGE

STAGE 1 — IMMEDIATE CROSS-BORDER FUNDING:

Estimated 4–8 Scottish apprentices per year at full funding.

College affiliation and tuition: approximately £5,000–£7,000 per apprentice per year.

Block-release accommodation contribution: approximately £2,000–£3,000 per apprentice per year.

Estimated annual cost: £28,000–£80,000 — a fraction of a single SDS framework budget.

STAGE 2 — BLENDED PARTNERSHIP DEVELOPMENT:

Partnership development, curriculum adaptation, and joint FRC approval: one-off £50,000–£100,000.

SRUC contribution to practical block-release delivery: £20,000–£40,000 per year initially.

Estimated Stage 2 development cost: £70,000–£140,000 over three years.

STAGE 3 — FULL DOMESTIC PROGRAMME:

Costs comparable to any FRC-approved programme once established.

No capital infrastructure investment required — SRUC Oatridge facilities already exist in public ownership.

COST OF CONTINUED INACTION:

Scottish Government legal costs in Judicial Review: £25,000–£80,000.

Continued net decline in registered farrier numbers: unquantifiable welfare cost.

Scotland unprepared for the incoming Veterinary Act: reputational and constitutional cost.

The continued inability of Scotland's 7 ATFs to take on new apprentices: the loss of the only currently functioning element of Scottish farriery training, for want of funding that costs less per year than a single Judicial Review hearing.

6. WHAT THIS FRAMEWORK ASKS OF THE SCOTTISH GOVERNMENT

- 1. Direct Skills Development Scotland to fund Scottish-resident farriery apprentices at FRC-approved English colleges, with effect from 1 January 2027 at the latest. This is a Ministerial direction. It requires no legislation, no new infrastructure, and no new staff. It is the single most urgent and most achievable action available.**
- 2. Commission SRUC Oatridge and Myerscough College to develop a formal blended partnership proposal, with a feasibility report delivered within 90 days. The proposal should address curriculum mapping, FRC joint approval requirements, practical delivery at Oatridge, academic delivery at Myerscough, and the transition pathway toward greater Scottish academic autonomy over time.**
- 3. Establish a cross-sector Scottish Farriery Workforce Working Group — comprising the FRC, Horsescotland, BHS Scotland, World Horse Welfare, SRUC, Myerscough College, and practising Scottish farriers — to oversee implementation and produce a Scottish Farriery Workforce Plan aligned with the timeline of the incoming Veterinary Act.**
- 4. Commission the Chief Veterinary Officer for Scotland to produce a formal welfare impact assessment of the current farriery access gap across Scotland, establishing the baseline against which this framework's success will be measured. Given that the CVO co-signed**

the DEFRA White Paper foreword, this assessment falls squarely within her existing responsibilities.

This framework has been developed by a practising Fellow of the Worshipful Company of Farriers with direct, professional knowledge of how farriery training works, why Scotland's training pipeline collapsed, and what is and is not currently possible given the state of the workforce. It is offered in good faith as the only solution that is both honest about the constraints and credible as a path to resolution.

The legal notice that accompanies this document sets out what will happen if the Scottish Government declines to engage. This document sets out what we are asking it to do instead — and why every element of what we are asking is within its power, its budget, and its existing statutory obligations.

Neil Madden FWCF

21 July 2026