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Sent via email to: AnimalWelfareProject@daf.qld.gov.au

Dear Lisa,

Re: Submission regarding land transport of horses

Thank you for the opportunity to comment on this important issue. Our organisation, Coalition for the Protection of Racehorses (CPR) focuses upon the welfare of Thoroughbred horses. The research indicates that Thoroughbreds are particularly vulnerable to welfare risks during transport. We are interested in the welfare of all horses, especially given that racehorses can end up in a range of non-racing homes. CPR appreciate the efforts of the government to improve standards for all horses, and consider the changes need to be implemented without delay. We have responded to some of the points raised in the Consultation Paper of February 2021 in the pages below.

Overall, CPR is aware that scientific research regarding the transport of horses is relatively new, and given the additional uncertainty of Australian conditions, we strongly recommend that the upper limits of standards be adopted, rather than the minimum. The introduction of adequate standards in transport for horses will increase the costs to the industry, and CPR believes that the horses should no longer be forced to bear these costs through their own poor welfare, injury and death. In the future, the costs should be borne by the racing industry.

We make our comments with the understanding that the points raised in the Consultation Paper do not represent final, agreed proposals, and that there will be a further opportunity to review draft amendments to Standards and Guidelines when available. We also stress that in light of the developing nature of research in this field, the standards should be reviewed on an ongoing basis as new information comes to light, and be formally reviewed every three years.

Kind regards,

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Submission by the Coalition for the Protection of Racehorses

Land Transport of Horses Consultation Paper

The Coalition for the Protection of Racehorses (CPR) would like to make the following points about the proposed regulations and recommendations regarding horse transport.

CPR welcomes proposals that improve standards for horses, and we stress these should be introduced without delay. The Martin Report (2020, p. 80) states that “The defects in the current Code of Practice for the Transport of Livestock are staggeringly obvious. An expert panel, urgently assembled, would promptly address the concerns listed in this report.” The investigation also stated the implications of administrative delays will mean “many thousands more horses will unnecessarily suffer blatantly unsatisfactory transportation conditions.” (Martin Report, 2020, p. 81). The report also commented that their study revealed that “The community has a clear expectation that all animals, regardless of whether they are destined for slaughter, are entitled to high standards of welfare” (Martin Report, 2020, p. 71).

CPR appreciates that research regarding horse transport, particularly in Australia, is in its infancy and that much more work is needed to identify and resolve current problems (Padalino et al., 2016). It is evident that Australian conditions, especially in relation to longer distances travelled and higher temperatures, present substantially higher risks to horses than those in Europe, and standards based on overseas studies may not reflect the harshness of Australian conditions. This means, horses transported in Australia require stronger protections, especially regarding distances travelled, watering, rest times and prevention of fatigue. To this end we suggest that the highest possible standards be adopted, rather than the minimum, and that regulations include requirements for continuous review in the light of research developments.

The special feature of horses used by the racing industry, is that many Thoroughbreds travel on a regular basis. This applies particularly to those involved in jumps racing, where Thoroughbreds regularly travel between Victoria and South Australia, as well as lengthy distances within Victoria. Some horses such as “shuttle stallions” are subjected to very frequent transport. In addition to the stress caused by individual journeys, consideration must also be given then, to the accumulated stress upon these horses who travel on a frequent basis. To properly assess the impact of transport on horses, regulations should take into consideration, the accumulated stress placed upon horses who travel frequently. The annual number of journeys undertaken by individual horses should also be taken into account.

At the end of their journey Thoroughbreds are expected to perform in races that are physically demanding. Regulations must also factor in a period of adequate rest for horses after racing, before being transported away from the racetrack to their point of origin.

Transport clearly has negative impacts on horses’ wellbeing and subjects them to injury, illness and death. For the racing industry it is standard practice to transport horses at all stages of their lives, to and from the racetrack, for breeding and ultimately to a slaughterhouse or knackery. CPR strongly argues that the racing industry needs to substantially reduce the frequent and continuous transport of horses, because of the cumulative impacts on their welfare over long periods of time.

What information, education or resources would be needed to support industry to put the changes into practice?

The proposed improvements in standards are very likely to increase the costs of horse transport. The Martin Report (2020, p. 69) makes it clear that “What is considered as an optimal loading density from an economic standpoint, is not necessarily appropriate density from a welfare perspective.” Horses must not be made to pay for these increased costs, but should be borne by the racing industry, as part of their responsibility for the animals they have bred, trained and used for financial gain.

The research makes it clear that experienced drivers and handlers play a major part in providing better outcomes for horses being transported (Padalino et al., 2016). It is also noted this is particularly important during loading and unloading when injuries to both humans and horses are more likely to occur. The racing industry should therefore invest in the education, recruitment, use and payment of more experienced drivers and handlers for its horses. Padalino et al. (2016) found that horses transported by younger, inexperienced people were more likely to experience transport related injury and heat stroke. There should be regulation for mandatory specialized training in transport of horses, as is the case in Europe. This should include owners and others who transport horses on a small scale basis in floats. CPR notes that Thoroughbreds are often scratched from races because of injuries sustained in the float on the way to the track. There does not appear to be any requirement for follow up, nor adequate reporting on the extent of injury to the horse.

CPR strongly objects to research that is based upon experimental designs that subject animals to cruel treatment.

Mechanisms should be introduced for inspection of horses, especially after long journeys, including temperature testing, to prevent the onset of transport -related illness.

Providing water and rest during the journey

CPR agrees to an increase in watering times for horses during transport. We strongly suggest that the upper limits be adopted rather than minimum standards. Research has found that even with adequate access to water, horses can become fatigued on long journeys, which causes other impacts on their welfare (Friend, 2000). To date, standards are often based on studies conducted in Europe where distances and temperatures are much lower than Australia.

Horses should have access to water *and* feed before transport as restriction has been found to increase the risk of transport related heat stroke (Padalino et al., 2016). Horses should be provided with water during a 4-hour journey, especially in hot weather and where they will be or have already, competed in racing events. CPR agrees that the maximum standards, based on the most up to date scientific research, for providing water, feed and bedding for *all* horses before, during and after transport should be adopted.

Spelling requirements after long journeys:

CPR considers that spelling times must take into account the intended activity of the horse at the journey end, and the horse's activity prior to the journey. Horses expected to race for example will need longer rest times after a journey of any length. Horses who have competed in races or other equestrian events must be given adequate rest from that activity before being transported back to their stable. CPR notes that horses are often loaded onto a float

immediately after a race before a vet examination can be made. This practice should not be allowed.

The spelling times appear to be minimal, and based solely on journey time. Regulations should factor additional spelling time to consider the time of year and variability in temperatures, high temperatures, the races in which horses may have competed, whether or not they have sustained injuries while racing and factors such as age, lactating and pregnant mares and existing injuries or illness.

Record keeping requirements for provision of water

CPR agrees that records be kept for provision of water, regardless of journey time. Regular inspections of the records should be made, and penalties applied for non-compliance.

Prevention of heat stress

CPR supports measures that will prevent heat stress in transported horses. These may include transporting horses at night in hot weather, providing overhead shelter and ventilation and methods and places for assembling horses for loading and unloading. Some research (Friend, 2001) notes that in humid areas, night-time temperatures may not necessarily be lower than daytime. The requirement to transport horses only at night will extend journey time, resulting in increased stress levels and fatigue for horses. It will also mean that horses need to be adequately accommodated during the day, with water, feed and a place to rest. The proposals must specify how and where horses will be accommodated during such times on lengthy journeys.

Fit for the intended journey

CPR agrees that horses in poor condition should not be transported unless it is a last resort, and that in such cases, must be undertaken only with written advice from a vet.

After racing, horses must be assessed to ensure they are fit for the journey home, especially those who have been injured during a race.

Minimum age of foals for transport

CPR submits that that standard practice is that new-born foals should not be transported. In exceptions, we agree that transport should only be undertaken with written approval from a veterinarian, and deemed to be in the best interests of the foal. Foals should be transported with their mothers.

CPR agrees with the proposal that recently weaned foals and their mothers, be given access to water **at all times**, before, during and after transport.

Space allowance – loading density and clearance

CPR agrees in principle that adequate loading densities be applied for horses. Recent research shows that high densities result in poorer outcomes for horses, including injuries, and the myth that high densities result in horses “holding each other up” is false (Friend, 2001).

As a standard rule, mares in the last four weeks of pregnancy, and mothers and foals should not be transported unless it is in their interests. The transport of these horses should be

exceptional cases, and undertaken only with the approval of a vet. Pregnant mares, and mares with their foals should be given extra space, enough to lie down, with bedding on **all journeys**, and they should be transported separately to other animals.

CPR agrees with standards that allow a horse its full range of head motion.

CPR agrees with the proposal to prohibit the use of double-decker trailers to transport horses including ponies and donkeys.

CPR agrees that horses travel in backward facing positions.

Bedding should also be provided on **all** journeys for foals and their mothers, and pregnant mares.

We consider it reasonable that bedding should actually be provided for **all** horses, on **all** trips. If this is not feasible in all cases, then regulations should mandate that transports have non-slip surfaces. Given that the increase in water allocation will mean more urination, some kind of absorbent, removable covering on the floors of transports will be essential.

The provision of, and type of bedding for all horses should be regulated, rather than being a mere suggestion or recommendation.

Space allowance proposals for new standards

Space allocations for horses being transported should be based on the most recent scientific research, and which provides the highest standards for horse welfare.

Mix of animals transported together

CPR agrees with the proposal to prohibit the mixing for transport of handled and unhandled horses, stallions, mares and foals and pregnant mares, and that mares in season be segregated from stallions.

CPR agrees with the proposed requirement that hind shoes to be removed where horses travel in groups.

Use of dogs to work horses during transport

CPR agrees that the use of dogs be prohibited from working with horses during all stages of transport.

Use of restraints

CPR agrees with the proposed new standard to prohibit the use of cross tying to restrain horses. We agree that in the event a horse needs to be restrained, he/she must have the full range of head movement and be able to access food and water.

Additional comments

CPR wishes to stress that conditions for horses will only be adequately improved when the regulations are strictly policed and enforced. The Thoroughbred racing industry systematically “trades” in horses from birth through to their “disposal” – often at knackeries, slaughterhouses, and saleyards. Horse transport is an integral part of this system. Although we do not support the slaughter of horses for any reason, intervention, based on

enforcement of the proposed regulations presents an opportunity to alleviate some of the cruelty. For example, presenting sick and injured horses at saleyards, and subsequently loading them on to trucks, is a common occurrence and is most often done in breach of existing regulations. Horses “unfit for transport” should not be accepted at the saleyard, however, sending them away on the transport is also an unacceptable outcome. Saleyards must be required to report such instances to authorities and in failing to do so, they instead should be held accountable for the offence.

Overall, a system that involves regular inspections and audits needs to be established. Regulations are pointless unless they are enforced and the penalties are sufficient enough to discourage non-compliance. Anecdotal evidence suggests that there is currently very little, if any, monitoring of the transportation of horses and therefore no incentive to comply with current regulations, let alone new and more stringent rules that may be implemented.

This needs to change, whereby appointed officers regularly do random audits on known routes and known days where horses are likely to be transported. That is, to and from racetracks when races are being held, to and from saleyards, and along routes to slaughterhouses when horses are being received.

At the very least, non-compliance incidents should be reported, and adequate penalties for breaches must be pursued. This would act as some kind of deterrent and also help alert the community to incidents involving the poor treatment of horses in transport.

References

Friend, T. H. (2001). A review of recent research on the transportation of horses. *Journal of Animal Science* 79 (E Supplement): E32-E40.

(Martin Report) Martin, T. & Reid, P. (2020). *Inquiry into animal cruelty in the management of retired thoroughbred and standardbred horses in Queensland*. Brisbane: Queensland Racing Integrity Commission/State of Queensland.

Padalino, B., Hall, E., Raidal, S., Celi, P., Knight, P., Jeffcott, L., & Muscatello, G. (2015). Health problems and risk factors associated with long haul transport of horses in Australia. *Animals* 5: 1296-1310.

Padalino, B., Raidal, S., Hall, E., Knight, P., Celi, P., Jeffcott, L., & Muscatello, G. (2016). A survey on transport management practices associated with injuries and health problems in horses. *PLOS One* 11(9): e0162371.doi:10.1371/journal.pone.0162371.