

IMPROVING THE WELFARE OF HORSES DURING LAND TRANSPORT

Submission to Department of Agriculture and Fisheries Queensland

by Coalition for the Protection of Racehorses
October 2022



SUBMISSION for:

IMPROVING THE WELFARE OF HORSES DURING LAND TRANSPORT

Upload your submission by **midnight Friday 28 October 2022** at daf.engagementhub.com.au/horse-land-transport.

YOUR DETAILS	
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Consultation questions

Consultation questions 1-22 are included throughout the RIS. Your responses to the questions will assist the Animal Welfare Task Group (AWTG) to prepare the final decision RIS.

GENERAL QUESTIONS

1. Do you agree that horses have unique needs in relation to being transported in Australia?

Yes.

The CRIS explains many problems experienced by horses that result from being transported.

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. This means that standards based on overseas studies may not reflect the harshness of Australian conditions. Horses transported in Australia require stronger protections, especially regarding distances travelled, watering, rest times and prevention of fatigue. This means that management for heat stress must be mandatory, not a non-mandatory Guideline (see GB8.3 Managing heat stress).

It seems though, that horses transported in Australia may be given less consideration, as Hope (2022) suggests, the maximum European journey time being 8 hours, compared with 12 hours proposed in the CRIS.

2. Can you identify any other needs of horses that are relevant to transport?

In this question, we focus on the special needs of racehorses

Whilst CPR holds the view that transporting horses to be used as profit making objects or to end their lives outside of it being in the horses' best interest is entirely unacceptable,

we also recognise that so long as the inherently cruel industry of horse racing persists, that we must do all we can to help reduce the horses suffering. It is from this perspective that this and all further responses are made.

Racehorses in particular are transported frequently in Australia. This is partly an effect of the larger number of racetracks in Australia, many of which are quite small, resulting in horses being transported from their stable in order to race at many different locations. The maximum journey time of 12 hours however, will see these horses “falling through the cracks” for minimum spell duration and other “considerations”. **A shorter journey time of 4 hours is needed to provide for racehorses.**

The CRIS makes an assumption (p. 9) that because racehorses are “valued”, (and this clearly refers to their monetary value), they will be properly transported. Our data shows this assumption is not necessarily correct, and that racehorses are often injured during transport, to the extent they are not permitted to race. We agree with the other side of the argument made in the CRIS (p. 9) that the very same high value horse, is likely to be devalued (when he/she is not winning enough) and transported to the slaughterhouse, with little concern for their welfare.

The Standards and Guidelines give inadequate acknowledgment of the special needs of racehorses, and specifically the fact that at the end of their journey, they are required to perform in physically demanding races. Regulations must factor in a period of adequate rest after transport, and again after racing, before being transported back to their stable. The maximum journey time of 12 hours (SB8.1) means many horses will slip under this limit on their way to the race track, yet it is not clear, at what point a minimum 8 hours rest must be given before racing. Rest time post-race is also unclear, especially for horses who have sustained an injury (other than lameness) which can be cardiac, respiratory, colic, EIPH and other less acute injuries, but which may be exacerbated by transport.

CPR argues that the racing industry must substantially reduce the frequent and continuous transport of horses, because of the cumulative impacts on their welfare over long periods of time.

3. Do you agree there are animal welfare issues for horses during transport in Australia?

Yes.

CPR agrees with information presented in the Introduction and Section 1 of the CRIS in describing the many welfare issues suffered by horses during transport in Australia. These include those listed on page 11.

- physiological stress and social anxieties due to close confinement in unfamiliar surroundings and in unfamiliar social groups, excessive noises and unfamiliar smells
- injuries, like lacerations, fractures, abrasions or contusions
- muscular problems including tying up, muscle soreness and muscle stiffness
- heat stress and heat stroke evidenced by raised core body temperature, elevated rectal temperature >38.5°C, sweating, dehydration and lethargy
- gastrointestinal problems such as oesophageal obstruction, gastric ulceration, colonic faecal compaction, diarrhoea, colic or enterocolitis

- respiratory problems including nasal discharge, coughing, inflammation and infection of the upper and/or lower respiratory tract or pleuro-pneumonia
- death, where horses are found dead or are required to be humanely euthanased as a result of transport.

CPR argues that alleviating and avoiding these welfare issues, is not doing the horses a "favour", but it is their right as sentient beings, that they are not harmed during transport. Some horses are much more vulnerable than others, including foals, pregnant and recently foaled mares, sick and injured horses, and they deserve more consideration.

4. Do you think there are other issues that haven't been mentioned?

Existing systems of policing, and application of penalties have clearly not worked to protect horses and must be updated.

The issues of policing the Standards and Guidelines, and penalties for breaches is not mentioned in this CRIS. Given the broad level of decision-making granted to transport drivers, it is essential that regular checks are made on the horses' welfare during and after their transport.

Policing must be undertaken by authorised officers without conflicts of interest, who have been educated about horse welfare and their unique needs in being transported in Australia.

Penalties must be strong enough to act as a deterrent.

5. Do you have data or information that supports or does not support the issues outlined in section 1 of the CRIS?

Section 1: poor outcomes during transport,

The table below details the incidents in Victoria and South Australia (from early February to October 2022) for injuries and incidents to racehorses during transport to the race track. The data has been sourced from the Stewards Reports for the respective race meetings. All of these horses were scratched from the race. It is not known when and how the horses were transported back to their stable. Some had travelled substantial distances, notably *Kissinger* who travelled 600km from South Australia to Warrnambool Victoria, and arrived lame in the near hind.

In addition, many horses suffer serious injuries during their race, and are then transported back to their stable.

DATE	TRACK	HORSE	Trainer location at date of injury	Est distance Stable to Track	Injury sustained en route or loading on and off float leading to horse being scratched from the race
18/02/2022	Moonee Vallee	Running Cloud	Cranbourne	60	no detail

19/02/2022	Morphetville	Lianne	Murray Bridge	80	lacerations to off hind quarter
26/02/2022	Yarra Valley	Share The Rhythm	Wangaratta	217	Abrasions to off side hip and rump
13/03/2022	Towong	Miss Audacious	Wangaratta	203	lacerations to off hind hock
27/03/2022	Ballarat	Red Rapid	Cranbourne	162	no details
30/03/2022	Sandown	Island Edition	Pakenham	34	eye injury
23/04/2022	Kyneton	Steel Choice	Mornington	156	Lame, near hind
8/05/2022	Naracoorte	All Hard Wood	Murray Bridge	260	large skin abrasions
18/05/2022	Mt Gambier	Pretty Boy	Warrnambool	182	laceration to near side eye
18/05/2022	Mt Gambier	Happy Bibi	Craig Stewart, Millicent	50	abrasions to both hips
28/05/2022	Murray Bridge	Te Piro	Morphetville	80	no detail
25/06/2022	Morphetville	Kissinger	Warrnambool	600	lame near hind and multiple abrasions
29/06/2022	Balaklava	Marsyus	Morphetville	101	injured near hind cannon below the hock
2/07/2022	Murray Bridge	Chromatica	Murray Bridge	1	off hind injury
23/07/2022	Mildura	Last Hope	Echuca	373	no details,
10/08/2022	Sandown	Mister Dynamix	Crossley	303	no details
14/08/2022	Coleraine	The Onion thief	Stawell	148	no details
31/08/2022	Gawler	Oregon Trail	Strathalbyn	88	no details
3/08/2022	Gawler	City Beats	Morphetville	58	cast in float
14/09/2022	Balaclava	Shopster	Gawler	67	no detail
21/09/2022	Bendigo	Magic splendour	Pakenham	214	Rubbed hip in float
1/10/2022	Flemington	Anphina	Stawell	231	no details
8/10/2022	Hamilton	The Silent Sermon	Longenerong	147	Injured when being loaded to the float
12/10/2022	Caulfield	She's Pretty Rich	Cranbourne	40	Injury to off hind hoof

6. Do you think that the welfare of horses during transport is valued?

No.

Evidence presented by the Martin Inquiry (2020) and the CRIS (2022) show that horse welfare during transport is not valued by the various components of the racing industry, who either directly or indirectly are responsible for horse welfare.

Part of the problem appears to be that the quality of horse transport, and the degree of welfare thus provided, is directly related to the monetary or income producing capacity of the horse. As we show above, even this does not guarantee a horse will not be injured in transport. Thoroughbred “winners” are generally given more attention, while those being sent to slaughter have low monetary value, with subsequent low welfare outcomes. The same “winner” then, can be subjected to the cruelty in transport that was evidenced in the Martin Inquiry (2020).

All horses, regardless of their monetary value deserve an equal standard of welfare during their transport. CPR argues that all horses hold inherent value, regardless of their monetary value, their qualities and attributes, and any value attributed to them by humans.

Good welfare clearly comes at a higher financial price for the transporters, owners, trainers and so on. CPR believes the horse should not be expected to pay the shortfall in financial resources, by being forced to sacrifice their own welfare.

7. Do you think the issues identified in section 1 of the CRIS are sufficient to justify revising the standards for horse welfare during transport?

YES.

In addition, evidence from the 7:30 Report, *The Final Race*, and the Martin Inquiry (2020) about systemic failures in protecting racehorses have alerted the public to many of these issues. The public expects that the cruelty inflicted on racehorses in the various stages of their lives, including transport, will be resolved.

The information presented in the CRIS makes it abundantly evident that horses suffer under current rules of transport.

It is not clear however, why non-mandatory Guidelines are being proposed, even for Option 3. This seems inconsistent with the research evidence presented in the CRIS about the risks to horses while being transported.

8. Which of the issues in sections 1.1 and 1.2 of the CRIS do you think pose the greatest concern for the welfare of horses being transported?

1.1 Poor horse welfare outcomes

We assume this question is asking for our assessment of community concern for horse welfare in transport. The community has, in the past demonstrated a concern for all issues regarding racehorse welfare when it is made evident to them. The death of a horse clearly resonates more than other issues, especially when the animal has been subjected to cruel treatment.

The problem with welfare in transport is that it is largely invisible to the public. Many welfare issues are hidden, either through direct efforts to disguise their occurrence, or where the

public lacks the necessary knowledge about animals. The issue of whips is a good example of a practice that was accepted, but is now contested, as a result of new research evidence being provided.

CPR considers that all of the issues listed below are of concern, because of different vulnerabilities of individual horses, and the potential for cumulative and interacting impacts of these issues.

physiological stress and social anxieties due to close confinement in unfamiliar surroundings and in unfamiliar social groups, excessive noises and unfamiliar smells

- injuries, like lacerations, fractures, abrasions or contusions
- muscular problems including tying up, muscle soreness and muscle stiffness
- heat stress and heat stroke evidenced by raised core body temperature, elevated rectal temperature >38.5°C, sweating, dehydration and lethargy
- gastrointestinal problems such as oesophageal obstruction, gastric ulceration, colonic faecal compaction, diarrhoea, colic or enterocolitis
- respiratory problems including nasal discharge, coughing, inflammation and infection of the upper and/or lower respiratory tract or pleuro-pneumonia
- death, where horses are found dead or are required to be humanely euthanased as a result of transport

1.2 Defining and valuing animal welfare

The problem identified in the CRIS is in trying to create a “reasonable balance” between the horse’s welfare and the financial needs of industry, particularly transporters. A good deal of the problem appears to be in paying for adequate and appropriate transport. At present, the horse is bearing most of these costs in poor welfare, injury and death.

CPR holds the view, that if a horse must be transported, those responsible (owners, trainers, transporters) should bear the cost - not the horse.

A further issue lies in confusing and conflating values and ethics. The industry claims to value their horses, but when it comes to their transport, clearly the ethical responsibility to treat them well, and not cause them harm appears to have been set aside. In other words, a part of the problem is that monetary value has been given higher importance than the inherent value of the horse. This then allows for unethical practices in transport that harm the horse.

The Australian community holds high inherent values for racehorses, and their reactions to the findings of the 7:30 Report and subsequent Martin Inquiry strongly indicates they expect horses should be transported in such a way that they are not harmed.

9. Are there costs (financial or otherwise) if horses are not transported appropriately?

YES.

The costs of inappropriate transport are immediately suffered by the horse. At present the welfare balance between horses being transported and the interests of the persons

transporting them is substantially weighted against the interests of the horse. Poor welfare is cheap, and can be financially beneficial to those involved in moving a horse.

CPR supports the change in perspective suggested by McInerny (page 14 of the CRIS) that in the first instance, the primary consideration should relate to a high value for animal welfare. The cost of welfare should be an effect of what is necessary to provide good welfare. At present, the status quo is to consider costs first, and welfare second.

Good welfare needs to be seen as a benefit. Most certainly the horse will benefit, but the Australian community will also value that welfare. At present however, the social licence for horse racing has suffered substantial decline as a result of serious welfare failures, reported in for example, the 7.30 Report, The Final Race, and the Martin Inquiry (2020) (Duncan, Graham & McManus, 2018).

In financial terms, poor welfare and injuries for racehorses means they may be scratched from races altogether (as shown in Question 5 above), or perform poorly, thus forgoing winnings potential. Horses will also require veterinary treatment.

10. Do you think horse transporters are voluntarily exceeding the current national welfare standards?

The evidence regarding horse welfare strongly indicates this is most unlikely for the majority of horse transporters. That said, the current national welfare standards are set at a very low level.

11. Should industry set and enforce their own rules for the welfare of horses during transport? Why or why not?

Absolutely not.

Self-regulation of the racing industry has been shown to provide poor outcomes for the horses it uses. The evidence is provided in over breeding and subsequent slaughter of unwanted horses, as well as frequent injuries and deaths in racing and training. Horses also suffer from EIPH, cardiac and respiratory problems, gastric ulcers and other issues reported in the media. These issues are rampant in the self-regulated system of horse racing.

12. Can you identify any other options that would address the problem discussed in section 1 of the CRIS? (Yes/No and comments)

Industry should provide appropriate and adequate transport that suits the needs and will provide good welfare for all horses during and after their journey.

ALL horses should be treated with respect, as valuable, sentient beings.

Reduce the frequency of transport of racehorses. "Shuttle stallions" for example are frequently transported.

Transport vulnerable horses only if necessary for their own welfare, and with veterinary advice and approval.

QUESTIONS FOR OPTION 1

13. Do you think there would be a net benefit to the welfare of horses under Option 1?

No.

Option 1 is Do Nothing. This is the status quo where horses are suffering a range of poor welfare outcomes as detailed in the CRIS.

14. Do you think Option 1 is better than Options 2 or 3?

No.

This is the status quo which has proven to provide a less than reasonable balance for the horse being transported.

QUESTIONS FOR OPTION 2

15. Do you think there would be a net benefit to the welfare of horses under Option 2?

Unlikely

Some benefits may be provided for horses, but this is likely to be lessened because of two interdependent factors. This could effectively result in continuation of the status quo.

1. A lack of adequate policing and penalties for welfare breaches; and
2. Allowing transporters and the racing industry to make decisions about horse welfare, according to a set of Guidelines that is non-mandatory.

16. Is Option 2 better than Options 1 and 3? Why or why not?

No

On the surface, Option 2 seems better than Option 1 because of revised Guidelines.

Because Option 2 proposes only enhancement of voluntary, non-regulated/non-mandatory Guidelines, the practical effect of improved welfare beyond the status quo is unlikely. The horses probably will not notice any benefits.

Option 3 proposes a limited set of revised mandatory Standards for lameness and new standards for foals, truck and trailer design, horse body condition assessment and transport across Bass Strait. This makes it better than Option 2.

Option 3 is likely to have less than anticipated welfare improvements because of the non-mandatory Guidelines (detailed further in Question 19).

QUESTIONS FOR OPTION 3

17. Do you support sub-option A or B on record-keeping?

Record keeping must be mandatory for ALL journeys.

This will require a system to track the records in order to police and enforce them. It will also allow for reporting to the Australian community on transport practices and horse welfare outcomes.

18. If Option 3 were implemented, in what areas would you need to change your current practice to comply, and how would this impact your costs?

n/a

19. Do you think there would be a net benefit to the welfare of horses under Option 3?

Possibly yes, but there are also many potential problems and loopholes.

It is essential that there are revised rules regarding policing of the Standards, enforcement and penalties.

The Guidelines must be mandatory in order to provide stronger assurance for welfare during transport.

If Guidelines are to be non-mandatory, and subject to decisions made by industry, then they should relate to minor issues only, that will not affect welfare. At present, the CRIS sets out many Guidelines that will potentially result in continued poor welfare for horses being transported.

We understand the many variables that will determine the best option for individual horses. That said, allowing non-mandatory Guidelines, placing responsibility and decision-making with the industry and transport, together with a lack of policing, is in effect, making only a minimal if any, change to current practice.

In relation to the actual welfare of the horse, specific welfare issues are limited to the Standards listed below. All other considerations and welfare issues are part of the non-mandatory Guidelines.

- **SB8.1 Journey time**

CPR believes these journey times, under Australian conditions are too long, and inconsistent with European standards.

We propose an intermediate, shorter journey time of 4 hours. This would include many journeys to and from race tracks.

- **SB8.2 Last 4 weeks of pregnancy;**

The journey time of 8 hours is too long for a heavily pregnant horse. In addition, these mares should be transported only in the interests of their own welfare, and on veterinary advice.

- **SB8.4 Lameness;**

the Guidelines are not specific enough in relation to racehorses who become lame during a race.

- **SB8.5 Body condition;**

- **SB8.6 Foals;**

A journey of 8 hours is far too long for a foal. They should be transported only where it is in their own welfare interests, and with the approval of a veterinarian.

- **SB8.18 Heat stress.**

SN8.10 A mother and foal should be provided with space for the foal to suckle and lie down. This should be a mandatory requirement regardless of journey time, and not limited to five or more hour journeys. It would be a more than reasonable balance, to provide evidence as to why a mother and foal should be transported, other than for their own welfare.

CPR argues that the following Guidelines should be mandatory.

GB8.1 This should be a standard rather than guideline “considerations” presumably at the discretion of the transport operator. That is, the points for consideration (listed below) **must** be mandatory, especially for long distance travel. “

- Fit for remainder of journey;
- Weather conditions favourable;
- Additional spell times during the journey;
- Longer spell time at the end of the journey – this will apply to racehorses for example; and
- Recent horse management before first loading.

GB8.2: Conditions that could adversely affect horse welfare during transport **must** be considered in the assessment of fitness for the intended journey.

GB8.3 Provision of water, feed, rest, exercise where horses are unloaded for journeys over 4 hours **must** be provided.

GB8.5 Provisions for transporting mares in last month of pregnancy. It is unreasonable to not provide such a horse with adequate welfare protection. For example, five-hour water

deprivation is unreasonable. Mares must have space to lie down and veterinary advice must be sought.

There must also be some reason provided by a veterinarian as to why such a horse should be transported at all, unless it is for her own welfare.

GB8.6 Mares who have recently given birth must not be transported within 7 days. Again, these “considerations” must be mandatory. Seven days after birthing is not long enough. Approval by a veterinarian must be given to transport such a horse, and it ought to be for her own welfare.

GB8.15 Relates to mares with young foals. This should be mandatory.

GB8.7 Water for recently weaned foals. We can see no reason for this to be non-mandatory. Evidence must be provided as to why a foal should be transported at all.

GB8.8 Many racehorses come off the track lame – sometimes in both front or hind legs. The “consideration” for horses with severe lameness (4 or 5) is non-mandatory. The statement that they “should only be transported for the shortest distance” does not provide an assurance for the horse’s welfare. Many stables are several hours drive from the track. More specific, mandatory Guidelines are needed in these cases.

GB8.9 Body condition below 2. Again, consideration that the horse “should be transported for the shortest distance necessary” is too vague to provide welfare assurance for the horse.

GB8.21 Provision of bedding that is adequate must be mandatory. It should not be a mere consideration to provide bedding that is cushioned, provides drainage, and that it is cleaned between horse consignments

GB8.3 Managing heat stress must be a requirement prior to undertaking a journey and apply for the entire length of the journey.

GB8.37 and 8.38 Guidelines for “humane destruction” are unacceptable, and show an appalling lack of respect and consideration towards a horse.

20. Is Option 3 better than Options 1 and 2? Why or why not?

Yes

21. Should any proposals only apply to some journeys? For example, journeys:

- over a certain distance or time period
- for a particular purpose
- in a particular type of vehicle?

If yes, which journey and why? Are there any other journeys that have not been specified but should be subject to specific proposals? Provide your response here.

References

CPR (2020) *'The Slaughter of Thoroughbred and Standardbred Racehorses in Australia: an estimate on the numbers killed for human consumption'*. CPR, Melbourne
<https://horseracingkills.com/wp-content/uploads/2020/10/The-slaughter-of-Thoroughbred-and-Standardbred-racehorses-in-Australia.pdf>

Duncan, E., Graham, R., & McManus, P. (2018). 'No one has even seen ... smelt ... or sensed a social licence': Animal geographies and social licence to operate. *Geoforum*, 96, 318-327.

Hope, Z. (2022, October 4). Australia flags caps on traveltimes to prevent horse cruelty. *Brisbane Times*.

(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.

22. Please complete the table on the following pages to provide feedback on the impacts/costs/savings for proposals under Option 3.

Evaluation of Option 3 – please complete the following

		Tick one and, if possible, provide estimate of annual cost or saving.				
Aspect of proposal	Would you need to change your practices to comply? If so, how?	Major cost impact	Minor cost impact	No cost impact	Minor saving	Major saving
4.3.1 Provision of Water, Feed and Rest during the journey		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.2 Record keeping option A		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.2 Record keeping option B		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.3 Segregation of animals during transport		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.4 Removal of hind shoes in certain situations		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.5 Space allowance		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.6 Use of restraints		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.7 Bedding and flooring		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$

		Tick one and, if possible, provide estimate of annual cost or saving.				
Aspect of proposal	Would you need to change your practices to comply? If so, how?	Major cost impact	Minor cost impact	No cost impact	Minor saving	Major saving
4.3.8 Multi-deck trailers		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.9 Fit for the intended journey		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$
4.3.10 Mitigating welfare risks in extreme temperatures		<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$	<input type="checkbox"/> \$