

Meredith Flash



As the lead researcher on The Australian Wellbeing Project and an equine veterinarian with 13 years' experience working in Australia with racing, performance and pleasure horses, I am pleased to contribute this submission to the Queensland Government's Equine Welfare Inquiry.

For the last 6 years I have been researching the barriers for foals progressing to become racehorses, the drivers for their exiting the racing industry and the outcomes for thoroughbred horses after racing in Australia. The thoroughbred industry recognises this area of research as an essential component guiding evidence-based decision making and its communication with stakeholders and the wider community. The Australian Thoroughbred Wellbeing project received funding from Racing Victoria (2016-2019 to fund my PhD studies) and AgriFutures Thoroughbred Horses Program (June 2018-May 2021) to conduct an industry wide survey. The survey investigates the drivers of exit and outcomes for horses exiting the thoroughbred industry, either before they enter race training, or at the completion of their racing career. Between December 2018 and June 2019, we surveyed the breeders and trainers of over 7500 thoroughbreds produced by, or participating in, the thoroughbred industry in Australia.

The wellbeing of thoroughbreds before, during and after their racing careers is a topic I am very passionate about as a researcher and an equine veterinarian. I welcome the opportunity to respond to some of the questions raised by the Inquiry.

Should welfare standards for retired racehorses be defined in terms of quality of life or length of life, or both?

While length and quality of life are of concern to the thoroughbred industry and its community stakeholders, length of life should not be at the expense of quality of life. Welfare for retired racehorses should be in line with the standards applied to other horses and other animal species, where it is the quality of life for the animal at the present moment that is the major influence on decision making. A retired racehorse's life should not be prolonged if its quality of life is compromised. Once this ethos is accepted then the next challenge becomes determining what constitutes appropriate quality of life and what are the compromises that the community is prepared to accept to the horse's quality of life over the course of its life.

Is there still an argument for commercial slaughter of horses, if performed appropriately and humanely?

The commercial slaughter of horses is appropriate if the slaughter and the events, such as transportation and handling, prior to slaughter are well regulated and performed humanely. Horse welfare must be the foremost consideration at every step in the process.

However, if the Thoroughbred industry feels the commercial slaughter of racehorses places the industry at risk in the terms of its social license, it may choose to put restrictions in place preventing racehorses from being processed via commercial slaughter. A ban on the

slaughter of racehorses presents its own challenges and risks to the industry, in particular how the industry regulates the large number of thoroughbred horses that are part of the recreational horse sector and therefore out of its control.

A ban on the slaughter of retired racehorses as they leave the racetrack does not equate to a ban on the slaughter of all thoroughbreds, due to the large number of thoroughbreds currently in the recreational sector of the horse industry. While estimates vary, research suggests that the number of thoroughbreds participating in the recreational horse sector is equal to or greater than those participating in the thoroughbred racing and breeding industries[1; 2].

The Thoroughbred industry must also consider the potential consequences that a ban on the slaughter of thoroughbreds would have on the ongoing welfare of these horses. In 2007, the United States (US) ceased the domestic slaughter of all horses. In many instances this ban has resulted in poor welfare outcomes for horses, with horses being transported long distances, in some instances while sick or injured, to processing plants in Mexico or Canada, where the standards of slaughter are outside of the US control, as reported in a 2011 US Government Accountability Office(GAO) report[3].

The USGAO report describes a 148% and 660% increase in imports of horses from the US to Canada and Mexico respectively, from 2006 to 2010[3]. The report concluded that *“an unintended consequence of the cessation of domestic slaughter [was] those horses are traveling farther to meet the same end in foreign facilities where U.S. humane slaughtering protections do not apply”* and *“that the number of U.S horses that are purchased for slaughter has not decreased”*. Concerns were also raised about the welfare implications of the increased numbers of unwanted horses for sale and horses abandoned on public lands affecting the federal government’s ability to manage wild horse populations.

The United States’ experience is a case study on the potential consequences of a ban on the slaughter of horses domestically in Australia. Potential consequences for Australian horses could be far worse due to the lack of a land border with neighbouring countries and include:

- live export by sea, which would result in horses being transported over long distances and time periods on ship that were not originally designed for horses
- land transport of horses over long distances to points of export and the horses being held for an indefinite period of time prior to export.
- slaughter of Australian horses overseas in conditions that may be of a lower standard than is considered acceptable within Australia.
- an increase in situations of neglect or abandonment, particularly in the current drought conditions being experienced in many areas of Australia where horses may experience starvation and reduced standards of care because the owners are not financially able to adequately provide for them.

Are you aware of any gaps or inadequacies in the regulatory arrangement, including the transport standards, for managing the welfare of horses in the meat processing industry?

Currently the standards for regulation of transport welfare standards resides with State and Territory governments. Horses are a highly mobile animal species and in certain sectors of the equine industry travel interstate occurs frequently.

Responsibilities of enforcement and standards of care during transport may differ between the state where the horse originated from and their final destination. There is a lack of consistency between State and Territory guidelines for animal welfare in the areas of land transport, saleyards and depots. The Australian Animal Welfare Strategy, which was first developed in 2005 (<http://www.australiananimalwelfare.com.au/about-aaws/>) aims to harmonise these guidelines. However, The Australian Animal Welfare Standards and Guidelines website states that no progress has been made on the early draft standards and guideline for horses since 2011 (<http://www.animalwelfarestandards.net.au/horses/>).

In addition to a lack of consistent transport guidelines, the responsibilities for regulating horse meat processing also provides challenges. In particular, the regulation of processing horses for human consumption resides with the federal government and the slaughter of horses for pet food consumption resides with State governments. Clear, consistent national guidelines for the welfare of horses during transport and at point of slaughter of horses for both human consumption and pet food are needed.

If the inquiry were to recommend a rehoming program for retired racehorses in Queensland, what elements should it possess to deliver greatest benefit, and how should it be funded? Rehoming programs for retired racehorses should include incentive programs directed at the promotion of the Thoroughbred in a range of disciplines. Research we have conducted shows that horses exiting the thoroughbred industry participate in a wide variety of activities.

In our recent research, where participants have indicated that the horse is being used for ridden pursuits the most frequent disciplines they were used for were as a pleasure horse, show jumping, eventing, pony club, adult riding and dressage. Currently, many of the state racing authorities have programs that engage with specific equestrian disciplines such as Eventing, Dressage, Showjumping and Showhorse events. Other initiatives that may be of benefit could be directed at providing educational opportunities like those in Racing Victoria's Off The Track program's educational demonstrations at Equitana in November of 2018. These demonstrations discussed assessment of suitability for re-homing, methodology used by authorised re-trainers to educate retired racehorses for their post-racing careers and the benefits of owning a retired racehorse. The thoroughbred industry should also consider developing guidelines for suitability for re-homing and there also should be provisions for what happens to those horses that are not deemed to be suitable for re-homing under those guidelines.

Are you familiar with the current Federal Senate Committee into the feasibility of a National Horse Traceability Register? I support the federal senate committee's inquiry into a National Traceability Register. It is important that the register encompasses and is developed in consultation with all sectors of the horse industry in Australia, to ensure it provides the maximum return on investment. The cost of developing and maintaining a traceability register should be shared by the whole equine industry.

Other challenges that would need to be overcome include:

- privacy concerns relating to the availability of owner details,

- consistency of data from multiple sources,
- standardisation of identification of the horse,
- supporting legislative framework for the use of registry and
- authorised access to the details in the registry.

Can you provide details of any difficulties you have experiences in obtaining data on thoroughbred horses for your research.

Horses participating in the thoroughbred breeding and racing industry are a highly mobile, dynamic population.

The Australian Stud book (ASB) is responsible for maintaining records pertaining to the conception, birth, microchipping and DNA verification of parentage as well as details of any thoroughbred exported for racing or breeding purposes. Racing Australia and the Principal Racing Authorities (PRA) in each state are responsible for maintaining the records of horse details as supplied by ASB, records pertaining to ownership of the horse, records identifying the current trainer, where the horse is domiciled and any information pertaining to official trials and race entries within Australia. This information is maintained in the Racing Australia database called the Single National System (SNS). Detailed Racing Australia records, however, only pertain to horses that have had a stable return lodged.

- A stable return is a *“a notification submitted by a trainer to Racing Australia or a PRA, which contains information required by the Rules in respect of each horse under that trainer’s care or control”*.

Some state PRAs maintain a separate database that is linked to SNS. There is variability in the distribution of the non-active stable return statuses between states in the historical data I received for my project. It is unclear if the variability was due to difficulties transferring data held within the state racing databases to SNS or was a bias in the level of reporting for individual states. To further investigate this variability, horses that had an active status in SNS but had not participated in a race or trial for the 6 months prior to the follow up period were identified, and a sample of those horses were enrolled in a survey. We are currently undertaking the survey analysis for those horses and will report back to industry in early 2020.

The data required for my research is primarily historical data and in recent years the thoroughbred industry has made changes to the Australian Rules of Racing to address some of the challenges of following thoroughbreds from birth through to the first home after the retire from racing.

Can you provide details of gaps and suggestions for improvements in record keeping associated with the life cycle of thoroughbred horses.

Gaps in record keeping identified by survey responses include loss of traceability at point of sale, barriers to timely and accurate recording of a change in the horse’s status and loss of information once the horse leaves the jurisdiction of racing authorities.

Point of sale

Once the horse is sold at a thoroughbred sale, such as a yearling sale, or a mixed sale the details of the purchaser were not recorded in either the ASB or RA databases unless the

horse subsequently went on to train or race under a licensed person. The recent changes to the rules requiring a foal's ownership details to be registered from 30 days of age provides the industry with an opportunity to address one of the gaps identified in the survey of loss of traceability at point of sale when attending weanling or yearling sales. There is an opportunity for racing authorities to engage with industry sales companies to allow the ownership details of horses sold at thoroughbred industry sales to be updated by the sales company through the existing stable return system.

The sale to unlicensed persons presents a significant challenge to the traceability of thoroughbreds. There are limits to the jurisdiction of the racing authorities over unlicensed persons. The racing industry may want to consider licensing of all industry participants to improve compliance with reported ownership changes.

Barriers to timely and accurate recording of a change to status

Survey participants also identified some of the barriers to timely and accurate lodgement of stable returns included:

- the fees and time associated with collecting information required for lodging a stable return, particularly:
 - when the horse first enters training,
 - when there is a change in the ownership group and
 - with the differing reporting requirements for specific statuses
- that only named horses can have a stable return lodged and
 - not having all of the information available to meet the requirements for lodging a retirement stable return.

Many studs, trainer and sales company utilise third party software such as Ardex or Prism to track the horses in their care. The industry may want to consider developing a digital interface with Stable Assist that could be incorporated into the third-party software to assist with lowering the cost and improve the timely reporting of changes to the horses' status.

Loss of information once the horse is retired

Survey participants identified a loss of information and jurisdiction over a thoroughbred once it is sold or gifted to people outside of the thoroughbred industry. The industry may want to consider incentives for owners of retired racehorses to update the horse's detail with the racing authorities. The industry may want to consider engaging with non-thoroughbred specific livestock sale companies to investigate what support is needed to better capture information on horses sold through these means. I support Racing Victoria's proposed expansion of the Off The Track database to include all horses as they retire.

[1] Hemsworth, L. (2012) *The Welfare of Recreational Horses in Victoria*. Doctoral thesis, Monash University, Clayton, Australia.

[2] Gordon, J. (2001) *The Horse Industry: Contributing to the Australian Economy*, RIRDC, Canberra, ACT. pp 1-66.

[3] Anonymous (2011) *Horse Welfare: Action Needed to Address Unintended Consequences from Cessation of Domestic Slaughtering*, Ed: U.S.G.A. Office, gao.gov.