



## Creating a compassionate world

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 Queensland Racing Integrity Commission  
 Level 6, 41 George St, Brisbane QLD 4000  
 Sent by email: [Contact@inquiry.qric.qld.gov.au](mailto:Contact@inquiry.qric.qld.gov.au)

### ***Inquiry into animal cruelty in the management of retired racehorses in Queensland*** **Submission on behalf of Animal Liberation Queensland**

Thank you for the opportunity to provide a submission in relation to animal cruelty and the management of retired racehorses in Queensland.

Animal Liberation Queensland (ALQ) is an independent animal advocacy organisation founded in 1979. ALQ is a not-for-profit organisation in the state of Queensland and a registered charity. ALQ campaigns on a broad range of animal protection issues and represents the interests of all animals. We are well known for our investigation that exposed the cruel and illegal practice of live baiting in the greyhound racing industry in Queensland, as seen on 4 Corners in February 2015. We work closely with the Coalition for the Protection of Racehorses to advocate for better protection of racehorses in Australia. More information is available at [www.alq.org.au](http://www.alq.org.au).

ALQ holds serious concerns about horse racing and our position is that it is not appropriate to be putting animals in a position where they are overbred, mistreated (including through use of drugs, over-exerting and use of whips, use of tongue ties, and cruel training methods such as electric 'jiggers'), injured, and discarded, and we therefore advocate for a total prohibition on horse racing. As long as horse racing continues, the industry has an obligation to offer the best care and retirement to all animals and bring standards in line with public expectations.

We have been raising serious concerns in regard to the regulatory regime for animal cruelty and animal agriculture (including animals killed in abattoirs) with the Department of Agriculture for many years. We will outline some of these concerns and examples below. We will also offer recommendations in regard to the management of retired racehorses.

We also wish to note concerns regarding the terms of reference in that the reviewers are to consider the need to "promote integrity and public confidence" in both the racing industry and animal welfare arrangements in Queensland. While transparency and accountability are often consistent with both increased public confidence and good animal welfare outcomes, there can be

conflicts that result in attempts to hide information from the public. It would be an extremely unfortunate outcome if the industry's interest in public confidence were to outweigh meaningful changes to animal welfare and to reduction in animal cruelty offences and the number of retired racehorses slaughtered.

## Management of retired racehorses

### Responses to specific questions asked by QRIC

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

There is a public expectation that racehorses will be looked after post retirement, and certainly the industry projects this image. Retirement should mean both a quality life and a long life - an opportunity to live out their natural lifespan with their welfare needs met.

Good animal welfare requires appropriate treatment and prevention of injuries and diseases; appropriate food and water; freedom from discomfort, fear or distress; and freedom to express normal or natural behaviours.

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

ALQ argues against the slaughter of horses and rejects that any sentient animal that has their own interests and does not want to die, can be killed humanely - with the exception of a sick or injured animal with no hope of rehabilitation who is genuinely euthanised in the animal's best interests.

The definition of humane is to show compassion or benevolence. It would be hard to argue that to send a horse - who is no longer of commercial interest to the owner - to the slaughterhouse, is an act of kindness. Moral arguments aside, there is a practical issue being that there is inadequate oversight of abattoirs in Queensland (or any other state). We explain this further below.

**Should racehorses be an exception?**

As outlined above, ALQ takes issue with the slaughter of any individual. However, it could also be argued that the public has a perception and expectation that racehorses should be looked after, and we would agree with that expectation.

Certainly, whatever happens to them, the public, including racegoers, have a right to know exactly how the racehorses are treated and what happens to them after retirement. Transparency and accountability should underpin any good policy.

**Are you aware of any gaps or inadequacies in the regulatory arrangements for managing the welfare of retired racehorses?**

The biggest gap, as outlined throughout this submission, is the lack of accountability and transparency, particularly in relation to the tracking of retired racehorses from retirement to death. Once the horse is retired from the racing industry, the tracking of that horse ceases. This is where the problem occurs as horses disappear (on paper at least) and are at the complete mercy of their new owner. This allows the horse to be sent to slaughter without any details being recorded.

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

The transport of horses to abattoirs is not monitored effectively (if at all) by government officials and therefore there is no incentive to adhere to the regulations. As a result, it is not uncommon for horses to arrive sick, lame, injured, hungry, thirsty and even sometimes dead.

There is very little oversight of abattoirs in Queensland (nor any other state). With poorly paid workers who by necessity must disconnect from the work they are doing and the lives they are forced to take, fast moving production lines, and animals that are viewed only in terms of the value of their flesh, it is not unexpected for regular breaches of animal welfare regulations to take place. Add to this that surprise audits/inspections are rare (if at all), abattoirs rarely have CCTV cameras watching workers or the kill area (unless placed by a whistleblower/worker or activist/investigator), and the fact that **even when violations are detected they are almost never prosecuted**, then you essentially have a system where the businesses and workers can do whatever they like with no fear of repercussions.

We provide further examples below and highlight the culture of acceptance of widespread animal cruelty in the animal agriculture sector (which includes abattoirs where horses are killed).

**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?**

A rehoming scheme needs to be nationally adopted to prevent owners/trainers sending horses across the border to be killed for pet food or human consumption. The scheme would need to include rehabilitation and ensure that carers are trained to handle thoroughbreds. They should be traced through their entire life and include twice yearly check-ups to ensure records are up to date and the horse is being well cared for.

Importantly, when we factor in the current number of horses being bred, we do not believe it is sustainable to rehome all horses. Therefore it is essential that breeding is reduced by enforcing breeding caps and immediately ceasing all incentive programs and redirecting that money to welfare and rehoming programs. More information under 'Further comments' below.

**Are you familiar with the current Federal Senate Committee into the feasibility of a National Horse Traceability Register for all horses? What impact would this have on your organisation?**

ALQ supports the National Horse Traceability Register for all horses. Clearly, as demonstrated in the ABC's *7.30 Report*<sup>1</sup>, the transport of horses interstate has posed regulatory issues for state bodies. Furthermore, by failing to track horses from birth to death, the racing industry is giving a misleading picture of what happens to retired racehorses.

## Further comments

The issue of "wastage", or the slaughter of thousands of healthy races that are no longer of commercial value to the racing industry has been well known and documented for many years.

In 2014, Coalition for the Protection of Racehorses (CPR) developed a rehoming proposal which was submitted to the Racing Industry in 2014 and rejected<sup>2</sup>.

The proposal recommended:

- A reduction in breeding
- 1% levy on all betting turnover (to provide the bulk of funding for the scheme)
- 1% levy on prize money
- Foal registration levy to reduce overbreeding
- Rehoming incentive scheme
- A rehabilitation and rehoming model to increase popularity of thoroughbreds post-racing
- An immediate \$10 million injection into existing racehorse rehoming organisations.

We understand the Queensland government has recently announced a "1 per cent prize money levy for thoroughbred and harness racing to support Queensland's equine welfare"<sup>3</sup>. We welcome this move, however this does not go anywhere near far enough to raise the funds required to rehome all racehorses, nor does address the need to reduce overbreeding.

A critical part of reducing the slaughter of racehorses is to **dramatically reduce and cap breeding numbers**. It is not practical to believe homes can be found for the estimated 14,000 horses born into the racing industry every year, whose natural lifespan will be 20+ years after they retire.

Millions of dollars is currently spent by Racing Queensland on incentives and bonuses to encourage breeding. **All breeding incentive schemes (including Queensland Thoroughbred Incentive Scheme (QTIS) and QTISx<sup>4</sup> should be immediately ceased and the funding redirected into welfare and rehoming priorities.**

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<sup>1</sup> <https://www.abc.net.au/7.30/the-dark-side-of-the-horse-racing-industry/11614022>

<sup>2</sup> <https://horseracingkills.com/campaigns/wastage/>

<sup>3</sup> <http://statements.qld.gov.au/Statement/2019/11/9/palaszczuk-government-prioritises-horse-welfare>

<sup>4</sup> <https://www.racingqueensland.com.au/Thoroughbred-Industry/Queensland-Thoroughbred-Incentive-Scheme-OTIS>

Also critical for good transparency and animal welfare and industry accountability is full **tracking from birth to death of all horses born into the racing industry.**

It should be noted that the Macsporrán Inquiry recommended tracking for all greyhounds born into the greyhound industry in the report tabled on 1 June 2015. **However, we note with disappointment that over 4½ years later this has still not been implemented.** All of the recommendations of the Macsporrán Inquiry were accepted by the government. However, several of the key recommendations, including those addressing the overbreeding and killing of thousands of greyhounds have been put on hold. And we still see thousands of greyhounds being killed or “disappearing” from the greyhound racing industry<sup>5</sup>. Without accurate and mandatory tracking of all animals in the racing industry it is impossible to determine the exact number being killed.

As there are strong parallels between the horse racing industry and greyhound racing, we recommend that the inquiry also consider the findings from the Queensland Greyhound Racing Industry Commission of Inquiry (1 June 2015)<sup>6</sup>.

We hold some reservations as to whether this inquiry will result in meaningful action for the welfare of horses or whether recommendations from this inquiry will be quietly dropped once the public spotlight moves on. There needs to be appropriate accountability to ensure government and relevant departments and other stakeholders are held accountable for progressing any recommendations that may come out of this inquiry.

## Regulatory issues and animal cruelty concerns

The inquiry seeks to assess the adequacy of current arrangements for detecting, assessing, mitigating and prosecuting breaches of animal welfare, including in abattoirs where horses are killed. To make this assessment, it is vital that the broader context of the current animal welfare regulations in regard to farms and slaughterhouses in Queensland is understood.

We hold strong concerns regarding detection, as well as enforcement and prosecution of animal cruelty offences in regard to all animals in the agriculture sector (which for the purposes of this submission includes abattoirs killing horses as well as the transport of animals to/from saleyards and abattoirs).

ALQ has been raising our concerns about animal cruelty in the agricultural sector for many years. Every time we raise a concern in relation to farmed animal cruelty, this complaint goes to Biosecurity Queensland (BQ) within the Department of Agriculture. In every case, the offender is not prosecuted and we are not aware of any meaningful changes put in place. Furthermore, animal cruelty investigations by BQ are complaints based meaning the chances of any business involved in animals being investigated is extremely low. Therefore, there is no disincentive to follow best practice animal welfare or even to follow the minimal requirements under existing legislation.

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<https://www.news.com.au/technology/science/animals/anger-over-australias-disappeared-greyhounds/news-story/2cc5946b00ffdc2fdbfbaacfece2a437>

<sup>6</sup> <https://qric.blob.core.windows.net/wordpress/2017/03/greyhound-racing-industry-inquiry-report.pdf>

There is also a lack of transparency with no data available to the public in regard to animal cruelty issues investigated and what action has been taken. We note that a recommendation to improve transparency was also made as part of the recent parliamentary inquiry into the Agriculture and Other Legislation Amendment Bill 2019<sup>7</sup>.

**The scenes witnessed on ABC's 7.30 Report showing animal cruelty during slaughter of racehorses at Merramist Abattoir in Caboolture, as distressing as it was, is of no surprise to us. We have seen footage of and reported similar scenes of animal cruelty at other locations on numerous occasions. We are also unaware of any prosecutions that take place due to animal welfare violations.**

We have included one example case study below that illustrates this point. Further examples can be found in Appendix 1. In each of these cases there has been evidence of extreme animal cruelty, yet the Department has failed to prosecute those responsible, and all of these businesses are continuing to operate today. Not only has the Department failed to prosecute, but they would have failed to detect the breeches of animal welfare laws if it were not for activists and whistleblowers bringing it to their attention.

#### **Case Study: Failure to prosecute animal cruelty at Carey Bros Abattoir, Yangan (Qld)**

Knowing the failure of authorities to prosecute this type of cruelty, a group of activists (not associated with ALQ) entered Carey Bros slaughterhouse to bring public attention to the distressing and illegal practices taking place here.

The footage shows at least 21 breeches of animal welfare laws, including failure to appropriately stun several animals prior to slitting the animal's throat. However, instead of prosecuting the abattoir, the police prosecuted every activist who entered the facility, even those who left immediately when asked. We understand police searched several homes, which can only amount to an over the top reaction to a minor trespass offence or an investigation into how this footage of illegal practices came available.

In other words, authorities prosecuted activists who exposed the footage rather than the abattoir which is guilty of multiple animal cruelty offences.

This example paints a very clear picture of the typical response from authorities in regard to animal welfare offences committed in the animal agriculture sector.

Therefore, the scenes at Meramist abattoir, as broadcast on *ABC 7.30 Report* is of no surprise to us and we expect similar cruelty offences take place at most, if not all abattoirs in Queensland on a regular basis.

**Footage from Carey Bros abattoir available here: <https://vimeo.com/328923364>**

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<sup>7</sup> <https://www.parliament.qld.gov.au/work-of-committees/committees/SDNRAIDC/inquiries/current-inquiries/AOLAB2019>

## Summary

There are serious issues in regard to horse welfare that need to be rectified to bring the industry in line with public expectations.

All breeding incentive schemes or bonuses need to be scrapped immediately, with funding redirected to welfare and rehoming priorities. Breeding should be capped and tightly monitored. Further funding needs to be generated and directed into rehoming schemes and these need to be appropriately resourced and monitored. A robust scheme for monitoring of horses from birth to death needs to be adopted nationally.

Penalties for breaching rules need to offer significant deterrent and those found either seriously or repeatedly breaching the rules should also be permanently banned from horse ownership.

As outlined above, we also hold strong concerns regarding the lack of detection and enforcement of animal welfare violations in the animal agriculture sector. As long as detecting and strong prosecuting of animal cruelty offences is not made a priority by the government, we will continue to see these type of abuses (as seen at Meramist abattoir on ABC's 7.30 report) taking place far too regularly.

Again, penalties for animal welfare breaches need to offer significant deterrent. Transparency also needs to be increased to inform the public when breaches have been detected and what action has been taken, so they can have confidence in the system.


Thank you for considering these views. If you require further information, please do not hesitate to contact the undersigned.

Yours faithfully



**Chay Neal**

Executive Director



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## Appendix 1 - Examples of recent animal cruelty cases

- **Carey Bros Abattoir, Yangan, Queensland**

Footage showing at least 21 breeches of was released in April 2019 by Aussie Farms.

Further information on this case is outlined in our submission above.

Footage available here: <https://vimeo.com/328923364>

Result: No prosecution.



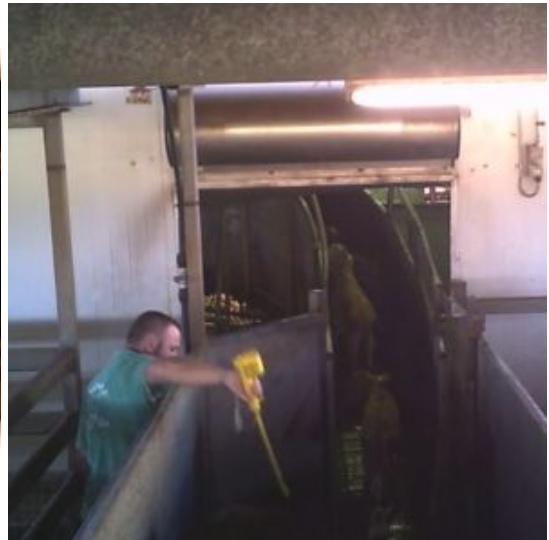
- **Highchester Slaughterhouse, Gleneagle, Queensland**

Regular rough handling and mistreatment of animals. Footage shows a calf that appears to show signs of consciousness and struggling after the bolt gun and he is then kicked and stomped on in an attempt to kill or restrain him before his throat is slit.

Result: No prosecution.

<https://alq.org.au/content/pauls-queensland-dairy-exposed>





- **Pig semen collection facility, Wacol, Queensland**

Footage released by ALQ in January shows filthy conditions, violent abuse by workers, untreated wounds, and one boar left to slowly die over several days.

Result: At least one animal euthanised by vet accompanying inspector. Direction order/s given. No prosecution.

<https://alq.org.au/wacol-pigs2>





- **Wonga Plains Feedlot, Bowenville, Queensland** - Widespread preventable deaths, particularly with calves; No shade or protection from elements, at all; Cattle suffered in heatwaves and were so weak, they were unable to reach water, and slowly died; Dead cattle left decaying in paddocks; Sick cattle left untreated in pens; Excessive use of jiggers leading to leg breaks.

Result: No prosecution.

<https://alq.org.au/wonga-plains>





- **Glasshouse Country Farms, Beerburrum, Queensland**

Footage shows routine (legal) practices such as tail docking of piglets without anaesthetic and teeth clipping. It shows multiple dead piglets as well as untreated wounds on the mother pigs. It also shows a mother pig being kicked and prodded and reluctant to move. After attempts to move her out failed, she was killed in front of all the others and can be seen thrashing around for some time while a worker stands over her. She is then dragged out.

Result: No prosecution. The response from the Department was the typical response: "We are unable to provide information regarding animal welfare complaints due to privacy laws."

<https://alq.org.au/beerburrum-piggery>







- **Sippel's Dairy, Woodford, Queensland**

Footage shows distressed calves, filthy conditions, untreated wounds and illness. Calves are tied away from their mothers or caged in small rusty pens. Footage also shows lame cows unable to walk and left untreated. We believe this farm violated existing laws and we made a complaint to authorities. 2 years later we received further footage from this farm showing that little had changed despite documented animal cruelty and complaints to authorities.

Result: No prosecution.

<https://alq.org.au/content/pauls-queensland-dairy-exposed>







We invite the inquiry reviewers to watch *Dominion: Documentary* which is available to watch online at [www.watchdominion.com](http://www.watchdominion.com) to get a full picture of routine treatment of animals in 'processing facilities' and what widespread commonplace practices look like. Only by understanding common practices that are accepted around Australia can we get an accurate picture and take positive steps to make improvements - not just for racehorses but for all animals.