



THE COALITION FOR THE PROTECTION OF RACEHORSES Inc.

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Inquiry Chair
Mr Terry Martin SC
Queensland Racing Integrity Commission
PO Box 15666
City East
Queensland, 4002

Dear Terry,

Re: Submission regarding the inquiry into animal cruelty in the management of retired racehorses in Queensland

Thank you for the opportunity to comment on this important and very serious issue. Our organisation (CPR) focuses upon the welfare of Thoroughbred racehorses. We are also interested in the welfare of all horses, especially given that racehorses can end up in a range of non-racing homes.

We have responded to the points raised in your invitation letter of 31 October 2019 in the pages below.

You can view our submission in support of a *National Horse Traceability Register* to the Senate Standing Committee on Rural and Regional Affairs and Transport, in April 2019 here <https://horseracingkills.com/wp-content/uploads/2019/10/Coalition-for-the-Protection-of-Racehorses-submission.pdf>

A link to CPR's (April, 2013) *Proposal for the Rehabilitation and Re-homing of Thoroughbred Racehorses in Australia*, is here, <https://drive.google.com/file/d/1lcRlXVjmfOsdC046KgzG8d-1FvWePu7/view>

Kind regards,

Elio Celotto
President
Coalition for the Protection of Racehorses



Postal Address:
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Submission by the Coalition for the Protection of Racehorses to the Queensland Racing Integrity Commission

Inquiry into animal cruelty in the management of retired Thoroughbred and Standardbred horses in Queensland

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

The welfare of all racehorses should be defined in terms of both quality of life and length of life. From their birth until retirement, racehorses are controlled by the racing industry, which involves practices that are cruel in many ways, including direct actions such as whipping, as well as deprivation of their natural needs such as being housed singly instead of with a herd, to having a diet that causes stomach ulcers. Retired racehorses deserve and should be given the opportunity to live out their full and natural life.

The average lifespan of a horse is about 25 years, and given that most are retired from racing at around five years of age, they will require care for a further 20 years or more. The racing industry is therefore faced with a very difficult problem, of its own creation, resulting from over breeding, which is exacerbated by the high cost required to care for them.

It is important to recognise that racehorse slaughter is the end point of the racing industry's use of horses, which encompasses breeding, training, racing and ultimately "retirement". It will require immediate and substantial re-structuring of the industry to address the inherent issues regarding the welfare of horses within the racing system. In the interim, steps must be taken to stop the slaughter.

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

In short, no. CPR believes that no argument can justify the slaughter of any animal, including horses, for any reason (other than for humane reasons in cases of the animal being in severe distress or illness that no treatment will alleviate, in which case euthanasia by a veterinarian should be the only process adopted). In light of information provided by other animal activist groups about processes in Australian slaughterhouses, CPR has no confidence that animal slaughter is ever nor could ever be made "humane".

The racing industry breeds horses for purely instrumental reasons, and has denied any responsibility in providing for these horses after their capacity to provide financial benefits has been exhausted. It is incumbent on the industry to find solutions to this problem which will no doubt require a substantial reconfiguration of their business model which to date, has used slaughter as a final solution.

3. Should racehorses be an exception?

CPR holds to an animal rights ethic, in which all animals have equal value, the right to their own lives and the right to be protected from harm.

We also acknowledge that racehorses present a unique perspective in the mind of the Australian public, who hold high expectations for the welfare of these animals. While some people may accept that horses are treated cruelly while they are racing, it is probably fair to say, that this view is held on the understanding that upon retirement, the average racehorse is rewarded with a life in a grassy paddock. We wish to comment that the public's high regard for thoroughbred racehorses should not be under-estimated. Researchers have found that the public holds a markedly higher value for, and bestows a higher social status on racehorses and the racing industry, than to greyhound racing which was the subject of a similar scandal a few years ago (Markwell et al., 2016).

A substantial part of the public's perception of racing and racehorses results from the marketing activity of the racing industry. Over many decades, the racing industry has assured the public that cruelty and wrong-doing results from the actions of a few 'bad apples', and that thoroughbreds are among the best cared for animals in the world. The industry has persistently chastised CPR's claims that thoroughbreds are sent to slaughter and again, repeatedly assured the public, that less than one percent are sent to abattoirs and that most are rehomed (Racing Australia, 2016). They have also encouraged the public to bond with racehorses by giving them individual names and by promoting some as celebrities (such as Black Caviar and Winx).

We suggest that the recent slaughterhouse scandal has created a sense of betrayal by the racing industry in the public's mind. The racing industry therefore needs to address this slaughter issue immediately if it wishes to retain its social licence.

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

The recent report on racehorse slaughter on the ABC's 7.30 clearly provides evidence that there are substantial gaps in regulatory arrangements. In fact, once a racehorse has been retired, as the racing industry has stated, they no longer have any interest in

the horse and all responsibility is passed on to the new owner. This however can in all likelihood mean that due to the lack of available homes, most retired horses within a few short years or even weeks can end up being slaughtered.

This is all despite the fact that the retirement form for these same horses will say the horse has been re-homed.

Mares

Furthermore, mares that are used for breeding are not accounted for when they are retired. With the industry claiming that 3,000 mares are going into breeding each year and a reduction in the overall breeding numbers reducing by approximately 1,000 each year for the last 6 years, this means approximately 4,000 mares are exiting breeding every year but not accounted for.

Foals

A similar situation applies to foals that despite having to be registered within 30 days, this can be extended to 120 days. This allows time for the breeder/owner time to analyse and decide whether the foal is viable as a racehorse. If not, the foal can be conveniently disposed of and not appear in any official statistics. Anecdotal evidence from stud workers suggests that foals considered 'unviable' are discarded.

NSW Racehorses

Racing NSW recently introduced regulations that no racehorse should be sent to slaughter and must be rehomed. Clearly, these rules have not worked. There appears to be no audit to ensure the information and regulations of the industry are being enforced or are accurate. There is not even any basic surveillance being carried out at the horse sales where these horses are traded and the knackeries and slaughterhouses where they are killed.

Lack of Transparency

There is also a tendency of those in the industry to purposely obscure and hide the truth of their actions because of the negative impacts on the image of the industry. There is also a total lack of cooperation exhibited by the state racing organisations who have in recent times blocked electronic communication.

In our opinion, there is a total lack of transparency in standards relating to retired racehorses and all animal welfare of horses before, during and after their racing careers.

5. 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?

Reports by animal welfare groups about consistent and serious animal welfare breaches in Australian slaughterhouses are now common on social media. The *ABC's 7.30* also showed the distressing conditions under which racehorses are being slaughtered at the Queensland Meramist abattoir and at knackeries.

Monitoring of abattoirs in Australian states, including Queensland is extremely poor. There are no CCTV cameras that could detect breaches to the very limited standards that currently exist and provide for the slaughterhouses to be monitored by external agencies and the general public.

The transport of horses to slaughter is also something that requires review. Currently despite there being some standards set for horse transport, they are far from sufficient and rarely enforced.

We must reiterate that although improvements could be made in the overseeing, enforcement and processes under which horses are transported and slaughtered, the question in itself is ultimately an impossible one to accurately answer. The word welfare and slaughter cannot co-exist. 'Welfare' means 'to maintain one's wellbeing'. Slaughtering an individual who does not want to die is not in any way in the interest of their wellbeing.

6. 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?

So long as the horse racing industry exists, CPR believes that every racehorse who leaves the industry, at the very least, deserves the opportunity to be rehabilitated, retrained and re-homed. Current facilities for rehabilitation and rehoming of retired racehorses is inadequate for the number of horses exiting the industry.

It is imperative that regulations regarding retirement of racehorses be implemented at the **national level**. This is the only way to stop cross-border trading and transfers that would allow racehorses to continue to be slaughtered for pet food and human consumption. Legislation must be enacted by the Federal Government and monitored by an independent government body.

Data on horses must also be maintained and monitored by an independent government body.

CPR supports the idea of a National Horse Traceability Register. Such a system must be able to account for the multiple transactions and ownership changes through which a racehorse often moves after it is retired from the racing industry. Sellers and buyers could then be held accountable for the welfare and whereabouts of every horse. This

would mean that any racehorse who was identified at a slaughterhouse could be referred back to the racing industry and their owners for care.

A profound cultural shift also needs to take place within the racing industry that makes owners aware that their responsibility to their horse does not end at retirement. When they choose to purchase a horse, they need to factor in that it is no different to purchasing a pet and their responsibility does not cease until a permanent and suitable home is found for their horse. If a new home cannot be found, it may mean that they will be required to pay for the upkeep until a new home can be found, and that for some horses, this may be for extended periods of time.

Funding

In 2013, CPR (2013) submitted a proposal to the racing industry which they rejected. The report (Coalition for the Protection of Racehorses, *Proposal for the Rehabilitation and Re-homing of Thoroughbred Racehorses in Australia*), <https://drive.google.com/file/d/1lcRlXVjmfOsdC046KgzG8d-1FvWePu7/view>, estimated an annual amount of \$200 million (in today's terms, based upon gambling income of \$19 million) would be required to adequately fund a racehorse rehabilitation and retirement program. The use of betting money would be an appropriate return for the horses who provide entertainment and gambling opportunities for many punters.

CPR's proposal in 2013, estimated that \$182 million could be funded as below. Note this was based upon 2011/2012 gambling revenue which was \$14.3 billion. In 2018, this figure is approximately \$19 billion.

Income (Australia Wide for 2011/2012)

- | | |
|------------------------------------|----------------------|
| • 1% on all betting turnover | \$143,000,000 |
| • 1% levy on prizemoney | \$ 4,350,000 |
| • Foal Registration levy (\$2,000) | \$ 30,000,000 |
| • Transfer of ownership levy | \$ 5,000,000 |
| • TOTAL | \$182,350,000 |

CPR's proposal also recommended:

Reduction of breeding

- introduce caps on mares covered by each stallion (which currently accrue serious welfare issues for the stallions);
- Improve selection of stallions and broodmares to avoid breeding poor quality foals who are then unable to meet the industry's requirements and are more likely to be retired; and

- Phase out government breeding incentive schemes such as Super VOBIS and VOBIS Gold.

A 'Retrain the trainer' program, to help rehabilitate horses that have behavioural issues as a result of being trained through outdated methods.

Rehoming incentive scheme – such as reimbursement of foal registration levy for successful rehoming.

Development of an assessment and spelling facility located in every state may eventually be required to accommodate the transfer and temporary placement of ex-racehorses. This facility would become a centre where horses could be initially brought for assessment and treatment. Horses ready for rehoming could be viewed by potential new owners at the facility.

Formation of a management body or committee

We note that Racing Victoria's recent proposal to set aside \$25 million over three years for the retirement of its horses, is completely inadequate for the task (Mottram, 2019). A part of this funding involves sending veterinarians to farms to euthanize racehorses, to "save" them from being slaughtered (Meldrum, 2019). These measures indicate an industry that is completely out of touch with animal welfare and the views of the public about racehorses.

Whilst we support and advocate for a retirement plan, ultimately, the idea that someone can force a life into the world with the view to not take responsibility for them for the entirety of their lives is immoral.

7. 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?

CPR supports the proposal for a National Horse Traceability Register. A summary of our recommendations, submitted in 2019, is below.

- Creation of a national database or registry for all horses with data collected by an independent statutory body;
- Microchipping and registration for all horses by 30 days of age;
- Responsibility by the owner for ensuring the new owners' details are forwarded to the registry;
- Accountability for transfer of new ownership on the national database;
- Saleyards must not auction horses without microchips and proof of registration;
- Change of horse location to be included on the registry;

- Upon a horse's death, the owners must report to the registry including reasons and manner of death;
- Slaughterhouses must scan the microchip of every horse and report to the registry; and
- Penalties must be severe enough to act as a deterrent including bans from future ownership, operating livestock sales, knackeries and slaughterhouses.

Our full submission can be read here <https://horseracingkills.com/wp-content/uploads/2019/10/Coalition-for-the-Protection-of-Racehorses-submission.pdf>

8. Detail of any data and data sources the Coalition for the Protection of Racehorses relies on when making claims about the number of horses bred for racing, that are not accounted for.

CPR estimates 'wastage' based upon the number of foals born and the final number of horses in racing at the end of each year. This information is provided in Racing Australia's annual *Fact Book*, which details thoroughbred breeding (mares, stallions and live foals), registrations, imports and exports.

- Racing Australia (2018). *Fact book 2017/18*. Sydney: Racing Australia. <http://www.racingaustralia.horse/Aboutus/FactBook.aspx>

As noted above in point 4, some classes of horses, in particular, broodmares and foals, are not adequately accounted for. This means that estimates of horses exiting racing may be underestimated by a substantial amount. Broodmares virtually disappear from the records, and there is no official information about their fate once they are retired from breeding. Anecdotal evidence suggests that some foals are killed because they are deemed 'unviable' to the racing industry.

A National Horse Traceability Register and a requirement that all foals must be registered by 30 days of age, would help overcome these discrepancies in the status of foals.

9. Detail of data and calculations relied upon to estimate the number of retired race horses that end up in a meat processing facility.

The only way to absolutely determine the number of horses slaughtered is to undertake a census at the slaughterhouse. To date, neither the abattoir nor the racing industry has been forthcoming.

CPR's estimate that 4,000 racehorses are slaughtered annually at a Queensland abattoir resulted from a ten-day sample taken by under-cover investigators over a

two-year period. The actual observations were extrapolated for one year. This figure did not include horses slaughtered at knackeries for pet food.

Some indications of the accuracy of CPR's estimate are provided by academic publications, including Doughty's study at an abattoir, and Hayek's study at a knacker, which were also based upon small samples:

- Doughty, A., Cross, N., Robins, A., & Phillips, D. J. C. (2009). The origin and foot condition of horses slaughtered in Australia for the human consumption market. *Equine Veterinary Journal* 41 (8), 808-811.
- Hayek, A.R. (2004). *Epidemiology of horses leaving the racing and breeding industries*. Bachelor of Science (Veterinary Science) thesis, University of Sydney.
- Thomson, P.C., Hayek, A.R., Jones, B., Evans, D.L., & McGreevy, P. D. (2014). Number, causes and destinations of horses leaving the Australian Thoroughbred and Standardbred racing industries. *Australian Veterinary Journal*. 92 (8), 303-311.

A recent article in *The Age* newspaper (Le Grand, 2019, p. 9) about an interview with a 'kill buyer' reported that, "The horses he buys are nearly all retired racehorses or trotters", that he buys most horses direct from trainers, and some from breeders or at auctions. The article further stated that four kill buyers between them transport about 400 horses a fortnight to Queensland. This would amount to 10,400 horses per year, and if half are thoroughbreds, this would be approximately 5,000 per year. The figure is consistent with CPR's 4,000 estimate.

Statements made in Racing Australia's *Annual Report* (2016) about the destinations of retired racehorses, that less than one percent of retired horses are sent to abattoirs, is clearly incorrect. A National Traceability Register would put an end to the debate about when, where, why and the numbers of racehorses that are slaughtered.

References

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- Markwell, K., Firth, T., & Hing, N. (2016). Blood on the race track: An analysis of ethical concerns regarding animal-based gambling. *Annals of Leisure Research*, 20(5), 594-609.
- Meldrum, H (2019, October 28). Racing Victoria to send vets to euthanase horses on farms following 7.30 slaughter revelations, *ABC News*, <https://www.abc.net.au/news/2019-10-28/racing-victoria-racing-club-racehorse-welfare-plan/11644776>
- Mottram, L. (2019, October 28). Racing Victoria to inject \$25 million into equine welfare. *ABC News*, [https://www.abc.net.au/radio/programs/pm/racing-victoria-to-inject-\\$25-million-into-equine-welfare/11647448](https://www.abc.net.au/radio/programs/pm/racing-victoria-to-inject-$25-million-into-equine-welfare/11647448)
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