

13 November 2019

Mr Terry Martin SC  
Inquiry Chair  
Queensland Racing Integrity Commission  
Queensland Government  
Level 6, 41 George Street  
Brisbane QLD 4000

**Submitted by email:** [Contact@inquiry.qric.qld.gov.au](mailto:Contact@inquiry.qric.qld.gov.au)

***Animals Australia submission to the Inquiry into Animal Cruelty in the  
Management of Retired Thoroughbred and Standardbred Horses in  
Queensland***

Dear Mr Martin,

Animals Australia welcomes the opportunity to provide input in response to the Inquiry into Animal Cruelty in the Management of Retired Thoroughbred and Standardbred Horses in Queensland ("**the Inquiry**").

In particular, by this submission we provide responses to relevant specific questions asked by QRIC of Animals Australia by your letter dated 31 October 2019.

While Animals Australia holds serious concerns about the welfare and management of retired racehorses, our concerns are not limited to these issues alone. We hold serious concerns regarding other ever-present and unaddressed welfare issues prevalent in the horse racing industry, including: mass over-breeding; trackside deaths; whipping; tonguettying; training abuse (electric shocks); drugging; and bleeding in the lungs due to running at abnormally fast paces over extended distances (which impacts up to 90% of racehorses).

Animals Australia therefore opposes horse racing outright and continues to advocate for a total ban on any activities that combine animals, gambling and prize purses.

However, until such time as a ban is in place, we continue to engage in review processes which may mitigate some animal suffering. It is in this context only that the following input is provided to the Inquiry.

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

Animal welfare means how an animal is coping with the conditions in which the animal lives. An animal is in a good state of welfare if (as indicated by scientific evidence) the animal is healthy, comfortable, well nourished, safe, able to express innate behaviour, and is not suffering from unpleasant states such as pain, fear, and distress.<sup>1</sup>

<sup>1</sup> Animal Health Australia, see: <https://www.animalhealthaustralia.com.au/what-we-do/livestock-welfare/>.

Good animal welfare requires disease prevention and veterinary treatment, appropriate shelter, management, nutrition, and humane handling.

Animal welfare refers to the state of the animal; the treatment that an animal receives is covered by other terms such as animal care, animal husbandry, and humane treatment.<sup>2</sup>

An animal's basic quality of life can be based on an assessment of an animal's physical and psychological state with respect to the five freedoms, as defined by Professor Brambell in 1965<sup>3</sup>:

1. **Freedom from Hunger and Thirst** – by ready access to fresh water and a diet to maintain full health and vigour.
2. **Freedom from Discomfort** – by providing an appropriate environment including shelter and a comfortable resting area.
3. **Freedom from Pain, Injury or Disease** – by prevention or rapid diagnosis and treatment.
4. **Freedom to Express Normal Behaviour** – by providing sufficient space, proper facilities and company of the animal's own kind.
5. **Freedom from Fear and Distress** – by ensuring conditions and treatment which avoid mental suffering.

Welfare standards for retired racehorses must be defined and applied in accordance with the above definition of 'animal welfare'. **Animal welfare is not a trade-off in *quality* versus *length of life***. All healthy racehorses – retired or otherwise – must be permitted to live their natural life in accordance with the above principles.

It is entirely inappropriate, contrary to animal welfare principles, and at odds with community standards to allow racehorses to continue to be mass bred, only to send them to slaughter once retired or deemed not fast enough to race.

Horses have an average lifespan of 25 to 30 years. Their minimum requirements for an acceptable quality of life include: social contact with others of their kind; access to water and grass for grazing (and additional feed where grass is absent or poor); safe areas to exercise and shelter from weather extremes; mental stimulation; and regular veterinary attention, worming and hoof trimming.

Providing racehorses with this care can be expensive, with one rescuer estimating her retired thoroughbred costs more than \$4,000 per year.<sup>4</sup>

Any person that breeds a horse must have the capacity, resources and funds available to care for the horse for the duration of that horse's natural life. This is pertinent to the racing industry, which sees thoroughbreds and standardbreds continually discarded at a young age and replaced with more horses. Horses can begin racing at two years of age, are

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<sup>2</sup> Ibid.

<sup>3</sup> Professor F. W. Rogers Brambell, F.R.S., *Report of the Technical Committee to Enquire into the Welfare of Animals kept under Intensive Livestock Husbandry Systems* (1965). Available here: <https://edepot.wur.nl/134379>.

<sup>4</sup> Gearin, M., 'Rehoming racehorses - an expensive fantasy retirement for the lucky few', 26 October 2019, *ABC Online*, <[article](#)>.

considered at their peak at four to five years old and some may continue until they are eight or nine years old.<sup>5</sup> They are therefore exiting the industry at less than a third of their expected lifespan. In addition to this, approximately one in five racehorses (thoroughbred and standardbred) born each year will not make it to the racecourse.<sup>6</sup>

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

In Australia, horses are typically bred for racing, equestrian, sporting, pleasure, companionship or therapy. The commercial slaughter of horses is an opportunistic industry that has taken advantage of, and profited from, the unacceptable 'wastage' of racing industries and the irresponsible 'backyard breeding' of other horse breeds.

In other words, the growing commercial slaughter of horses has developed as a symptom of uncontrolled breeding.

The commercial slaughter of horses is problematic for several reasons.

First, like cattle, horses are large animals with thick skulls that require a very powerful tool for stunning. The penetrative captive bolt gun seen being used at Meramist in the ABC's 7.30 report *'The Final Race'* was ineffective at reliably rendering the horses unconscious. One unidentified horse reportedly required five bolts, and many others can be seen kicking and 'galloping' on the grate, creating serious animal welfare issues and dangerous conditions for the workers.

Second, a large proportion of horses sent to slaughter are comfortable with and trusting of people, undoubtedly turning to the slaughterhouse workers for comfort from fear. This, combined with the high regard that the Australian community has for horses, makes the killing of them especially 'dirty work' with significant associated stigma, social and moral taint.<sup>7</sup> The internal conflict regularly experienced by slaughterhouse workers when reconciling their 'killing for a living' with their own personal ethics, and perpetration-induced traumatic stress<sup>8</sup>, are likely to be exacerbated under these circumstances.

Furthermore, the "commercial" nature of meat processing is problematic. Around 200 horses are slaughtered in an eight-hour workday at Meramist, meaning a person (the 'knocker') must knock a horse unconscious every 2 ½ minutes and the next person on the processing line (the 'sticker') must cut open the necks of the horses at the same fast pace, and so on as each animal is dismembered. Individuals who work in fast-paced commercial abattoirs must develop an emotional distance from the animals being processed as a coping mechanism, and this disconnect increases the likelihood of deliberate cruelty occurring<sup>9</sup>, which was evident in the footage aired on *'The Final Race'*. It is not realistic to expect any person working on a 'kill floor' to remain respectful of the lives they are repeatedly forced to take.

<sup>5</sup> 'Chapter 109: The European and Australasian Standardbreds', in *Diagnosis and Management of Lameness in the Horse (Second Edition)* 2011; Racing NSW, *Beginner's Guide to... Horses*. Available here: <https://www.racingnsw.com.au/guide-to-racing/beginners-guide-to/beginners-guide-to-horses/>.

<sup>6</sup> RSPCA Australia, *What happens to horses that leave the racing industry?*. Available here: <https://kb.rspca.org.au/knowledge-base/what-happens-to-horses-that-leave-the-racing-industry/#ftn1>.

<sup>7</sup> Baran et al, 'Routinized killing of animals: going beyond dirty work and prestige to understand the well-being of slaughterhouse workers' (2019), *Organization*, 23(3): 351-369.

<sup>8</sup> Dillard, J., A Slaughterhouse Nightmare: Psychological Harm Suffered by Slaughterhouse Employees and the Possibility of Redress through Legal Reform (2008), *Georgetown Journal on Poverty Law & Policy*, XV(2): 391-410.

<sup>9</sup> Richards et al, A Different Cut? Comparing Attitudes toward Animals and Propensity for Aggression within Two Primary Industry Cohorts - Farmers and Meatworkers' (2013), *Society & Animals*, 21: 395-413.

### 3. Should racehorses be an exception?

Horses have largely the same capacity to feel fear and pain – as well as the same desire to live and seek out positive experiences – as all mammals. In our view, horses bred by people for their own purposes must then be given the opportunity to live fulfilling and long lives. Thoroughbreds and standardbreds are not an exception in this regard, and any regulatory or legislative changes implemented to safeguard racehorses from unnecessary slaughtering and associated suffering should be extended to protect all horse breeds.

It is important to note, however, that the racing industry is a critical concern because the industry purposefully breeds the largest number of horses in the country. According to the industry's own publicly available records, at least 295,158 thoroughbreds<sup>10</sup> and 92,234 standardbreds<sup>11</sup> have been bred in the last 18 years, together producing about 17,000 horses per year. The horses are raced for profit, with some \$775,196,120 in prize money awarded to the connections of racing thoroughbreds<sup>12</sup> and standardbreds<sup>13</sup> across Australia in 2017/18.

It has been estimated that 33% of racing thoroughbreds and 28% of racing standardbreds - around one-third of the total racehorse population - exits the industry each year.<sup>14</sup>

According to Peter Loffel, a horse 'kill-buyer' who has supplied Meramist abattoir with approximately 200 horses each week for years, most of the horses processed in that facility are racehorses that have been purchased directly from industry participants<sup>15</sup>. This means that up to 10,000 discarded racehorses are being slaughtered each year at this one abattoir alone.

As was stated in *'The Final Race'*, this cycle of breeding, using and discarding racehorses is 'grotesque', and it needs to come to an end.

### 4. 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?

We refer to our response to Question 2 above. The commercial slaughter of any animal is subject to the risks and welfare issues discussed above. Transporting horses that are unfit to load is a welfare issue that stems across horse transport and livestock transport generally.

The *Standards and Guidelines for Land Transport of Livestock*<sup>16</sup> allows horses to be off water on trucks for 24 hours, and some journeys are permitted up to 36 hours. Even these

<sup>10</sup> Racing Australia Factbook 2017/18, Table 21, page 42. Available here:

<http://publishingservices.risa.com.au/otherpublications/Fact%20Book%202017-2018/9/#zoom=z>.

<sup>11</sup> Harness Racing Australia Annual On-line: National Registration Statistics - Sires, Services and Foalings - 1967-2019. Available here: [https://www.harness.org.au/hra/annual/public/stats/regn\\_all.pdf](https://www.harness.org.au/hra/annual/public/stats/regn_all.pdf).

<sup>12</sup> Racing Australia Factbook 2017/18, Table 1, page 9. Available here:

<http://publishingservices.risa.com.au/otherpublications/Fact%20Book%202017-2018/9/#zoom=z>.

<sup>13</sup> Harness Racing Australia Annual On-line: National Stake money, Statistics - 1966-2019 - Mobile and Standing Start Races. Available here: [https://www.harness.org.au/hra/annual/public/stats/stakes\\_all.pdf](https://www.harness.org.au/hra/annual/public/stats/stakes_all.pdf).

<sup>14</sup> Thomson et al, 'Number, causes and destinations of horses leaving the Australian Thoroughbred and Standardbred racing industries', *The Journal of the Australian Veterinarian Association Ltd*, 92(8): 303-311.

<sup>15</sup> Le Grand, C., 'Interview with a kill buyer: how racehorses end up as meat', 21 October 2019, The Sydney Morning Herald. Available here: <https://www.smh.com.au/sport/interview-with-a-kill-buyer-how-racehorses-end-up-as-meat-20191021-p532tz.html>.

<sup>16</sup> These Standards are regulated in Queensland. Available here:

<http://www.animalwelfarestandards.net.au/land-transport/>.

inadequate regulations are difficult to monitor as transporters' records and logs are difficult to verify, and thus standards are poorly enforced.

An indication of the failure of current transport standards (and/or their enforcement) is the recent report that the on-plant Australian Government veterinarian at Meramist abattoir had made nine animal welfare reports to the State Department about the 'condition' of the horses delivered for slaughter over the past year. It is reasonable to assume that the horses were either loaded when they were 'unfit' for transport, or the rigours of transport over such long distances (many come from interstate, including Victoria) had caused health and welfare issues.<sup>17</sup>

The fundamental issue, however, is the unregulated mass breeding of horses which is the source of unwanted horses being sent for slaughter, and therefore the unnecessary suffering caused. The natural desire of racing industry participants to 'breed the next Melbourne Cup winner' fuels the excessive breeding of racehorses, while failing to consider their long natural lifespans and failing to ensure there are enough long-term homes available for ex-racehorses.

To exacerbate the drive to 'breed a winner', racehorse owner and breeder incentive schemes have been established by the state racing authorities across Australia, to promote the breeding of racehorses within each state, and foster ownership of locally-bred racehorses. In 2018/19, Racing Queensland (RQ) paid out almost \$9 million in bonuses under the Queensland Thoroughbred Incentive Scheme (QTIS) and \$1.67 million in bonuses under the QBRED scheme for harness racing. RQ also announced the introduction of a second incentive for harness racing, QBRED For Life, which will have \$2.5 million in bonuses available in 2019/20<sup>18</sup>. No funds were allocated to rehoming and retraining in this time.

Since the 7.30 report exposé, it has been announced that RQ will implement a 1% prizemoney levy from 1 January 2020, which will provide approximately \$1.5 million for supporting "equine welfare". A further \$70,000 is being made available by the Queensland Racing Integrity Commission (QRIC) for projects that retrain and rehome racehorses.<sup>19</sup> While any funds are welcome, this funding is inadequate, and the comparison of funds allocated to breeding versus retraining and rehoming remains stark.

Addressing the serious issue of mass overbreeding and wastage is the single most effective way to improve the welfare of racehorses exiting the industry.

**5. 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?**

Animals Australia urges all racehorse breeders and owners to proactively take responsibility for their animals by ensuring horses are returned to their care if rehoming opportunities fail or end. For example, a breeder in NSW recently announced he would pay \$1,000 for any

<sup>17</sup> As reported in *The Age* on 25 October 2019. See Harris, R., 'Agriculture ministers to discuss racehorse welfare following cruelty revelations', *The Age*. Available here: <https://www.theage.com.au/politics/federal/agriculture-minister-pushes-state-racing-ministers-for-national-horse-register-20191025-p53472.html>.

<sup>18</sup> Racing Queensland Annual Report 2018/19, pages 36 and 56.

<sup>19</sup> Racing Queensland Media Release: 'Prize money levy for equine welfare', 9 November 2019. Available here: <https://www.racingqueensland.com.au/News-And-Guides/November-2019/Prize-money-levy-for-equine-welfare>.

horse bred at his stud who is found at risk of being slaughtered.<sup>20</sup> It is worth noting that all reputable greyhound rehoming organisations have a clause in the adoption agreement that greyhounds are to be returned to their care if the adopters ever need to relinquish the dog.

Animals Australia further urges the Inquiry to recommend the establishment of rehoming programs and initiatives that ensure all racing thoroughbreds and standardbreds live long, comfortable lives. However, an expansion of rehoming and fostering efforts will not withstand the magnitude of overbreeding and wastage produced by the industry, and so we suggest that **an immediate cap on breeding is warranted, and all breeding and ownership incentive schemes should be immediately abolished with those funds diverted to animal welfare and rehoming programs instead.**

**6. 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?**

Animals Australia is familiar with this ongoing Federal inquiry and supports the establishment of a national traceability scheme for all horses. From a horse welfare perspective, the key components of a national horse register and lifetime tracking system should include:

- Compulsory microchipping as a means of horse identification;
- Reliable updating of ownership records;
- Notification and veterinary verification of deaths; and
- A mandatory requirement for horses to have their microchip scanned and records updated upon entering a knackery or slaughterhouse.

The publication of slaughter statistics and traceability of slaughtered horses to an owner is likely to act as a deterrent to careless overbreeding and discarding of horses. **The penalties must be sufficient to deter non-compliance** and increase with every successive breach of the regulations.

Repeated failure to comply with the rules of the national register and/or evidence of wasteful breeding, should result in bans from future horse ownership.

Please contact me if further clarification is required.

Yours sincerely,



**Glenys Oogjes**  
Chief Executive Officer

<sup>20</sup> Le Grand, 'Interview with a kill buyer: how racehorses end up as meat', 21 October 2019, The Sydney Morning Herald. Available here: <https://www.smh.com.au/sport/interview-with-a-kill-buyer-how-racehorses-end-up-as-meat-20191021-p532tz.html>.