

RSPCA Qld and RSPCA Australia joint submission

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

November 2019

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As with the majority of people around Queensland and Australia, RSPCA Qld was horrified by the 7.30 Report's footage taken at Qld abattoirs and knackeries. Apart from the obvious suffering of the filmed horses, there were several clear breaches of the *Animal Care and Protection Act 2001*. We welcome the inquiry and the opportunity to provide comment.

[The RSPCA's policy on horse racing](#) recognises the significant animal welfare problems inherent in the racing industry (Policy 5.1) including oversupply, training injuries, the use of whips, physical overexertion and the fate of unwanted horses (wastage). We believe that the industry must take action to resolve these animal welfare problems (Policy 5.2) and that the problem of wastage is one that needs special attention (Policy 5.3). The adoption of formal processes to address the issue of retired and unwanted racehorses and the mandatory collection of comprehensive lifecycle data is important.

Further, the RSPCA believes that currently there is inadequate regulation around horse racing. For example, there are no mandatory welfare standards for racing horses.

General comments

Lifetime traceability

RSPCA supports the mandatory lifetime traceability of all horses in Australia, and specifically for all racehorses from birth to death. Although various attempts have been made to find out how many race horses are born, how many are registered to train, how many actually race and so on, there are inherent flaws with these studies. For example, they do not include the outcome of horses that are never registered to train, do not include all horses, exclude horses sent interstate, and depend on reports by owners and trainers who may not like to admit they send the horse to slaughter. Also, they do not cover horses that were retired and rehomed but were subsequently sent to slaughter.

The report from 2014 commissioned by Racing Victoria that reported some promising results with respect to outcomes after racing suffers from these same limitations.

Further information on the RSPCA's view on the fate of horses leaving the racing industry can be found here: <https://kb.rspca.org.au/knowledge-base/what-happens-to-horses-that-leave-the-racing-industry/>

The implementation of a National Horse Traceability Register for all horses would allow more accurate data to be collected and therefore a better understanding of the fate of all horses in Australia would follow.

Horses at abattoirs and knackeries

While the horse meat trade continues and horses are sent to abattoirs and knackeries (for whatever reason), the welfare of the horses and other equids must be ensured. There must be a recognition that ensuring good welfare outcomes for equids at slaughter places may require them to be treated differently than how other animals such as cattle and sheep are treated. For example, most cattle and sheep are used to being herded and moving along races. For most horses this is completely foreign.

When planning the procedures for equids at slaughter places, consideration must be given to the following aspects:

- **Transport** - horses are included and covered by the *land transport of livestock code* which includes such provisions as no electric prodders to be used on horses. Many horses (and all ex-race horses) will be used to being led on a halter and being transported in individual stalls. They will not be familiar with being driven onto the back of a truck and being all in together.
- **Handling** - there is a general move towards low-stress handling of livestock and this has spilled over to similar handling at abattoirs. Low-stress horse handling is equally if not more important but is significantly different. Horses must not be coerced, prodded, or pushed, and they will not react favourably to such handling.
- **Slaughter process** - this must be planned specifically for equids and assuming that the current method used for livestock is the best method is completely wrong. Horses must not see, hear or smell other horses being killed as this will completely spook them and increase the likelihood of them playing up and being difficult to manage.
- **Staff training** - having well-trained staff is vital to running a slaughter establishment that results in good welfare outcomes for all animals unfortunate enough to find themselves there. The training has to be specific for equids.
- **CCTV** - the use of CCTV sends a strong signal to those people working with animals, that animal welfare is of the highest priority and that cruelty will not be tolerated. CCTV should be used in those areas where the risk to animal welfare is greatest, e.g. at unloading from the transport vehicle, where animals are moved into and out of holding pens, or into a stunning area prior to slaughter. Increased monitoring is particularly important at slaughter. CCTV should not replace the hiring of people with the right attitude towards animals, comprehensive staff training and good stockmanship, however, it is an excellent means by which facility management and auditors can monitor compliance with standards and regulations relating to animal welfare. The presence of CCTV may also reassure the public that the practices at the slaughter establishment can and are monitored.

Outcomes for ex-race horses

The best outcome for all racehorses after their racing career has ended would definitely be a loving new home. Retired racehorses may be able to find a home and continue to perform in other sporting events such as dressage, eventing and specialist races. However, it is impossible to imagine that there would be sufficient new homes, at least in the short term, for all retired racehorses.

RSPCA supports all moves and programs aimed at identifying potential new homes and different activities for ex-racehorses. It is the responsibility of the race industry to take the need to cater for the retired horses seriously. However, not all retired racehorses are suitable candidates for such homes and there may be more retired horses than there are available homes, so options for humane killing need to be available for these horses. A humane death is a better welfare outcome than parking the horse in a paddock somewhere and then ignoring its needs. Unfortunately the RSPCA is called to many horses each year that are dying of starvation after being neglected in a paddock. Some of these horses are retired racing animals.

Horses can live for 20-30 years and their needs will vary with age and activity level. Horses tend to change hands regularly and it is easy to imagine that bad welfare may follow previous good welfare. Adequate and proper care of horses can prove expensive, therefore we need a range of options for retired horses.

Responses to specific questions

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

Welfare standards should always be intended to promote quality of life, rather than length of life. However, that does not mean it is appropriate that horses are bred without concern for over-supply leading to unwanted animals, neglect and/or the euthanasia of healthy animals. The issue of wastage in the racing industry is a product of several factors, all of which need to be considered, including over-supply of foals, short racing careers in comparison to the life-span of horses, early retirement due to injury, horses leaving racing unsuitable for other purposes, and a wider issue with breeding and lack of traceability of horses of all breeds.

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

All horses will, at some point, reach the end of their life, whether that is because they are unwell, injured, no longer wanted, or can no longer be appropriately cared for. In these circumstances a humane death is preferable to horses being left alive but neglected. The most humane death for a horse is for it to be killed *in situ*, by a lethal injection administered by a veterinarian, or by appropriate application by a trained and competent operator of a penetrating captive bolt or firearm. This is also the only humane option for horses that are unfit for transport. Some knackeries provide services where they come to the owner's property to euthanase the horse and then remove the carcass, which also avoids the need for transport.

Where horses are fit for transport, it is likely that some form of commercial slaughter will still occur, either through knacker services or an abattoir.

In order for commercial slaughter to be humane, a number of critical changes are needed to current arrangements, including

- improvements to existing land transport standards for horses, and enforcement of these standards
- improvements to existing abattoir facilities (see above and our response to **Question 6** for more detail)
- the development of horse-specific welfare standards, regulation and welfare auditing within both abattoirs and knackeries
- increased access to alternative euthanasia options, including where horses can be humanely killed *in situ*

3. Should racehorses be an exception?

The RSPCA believes that the racing industry needs to do more to adopt responsible breeding practices including reducing the number of racehorses bred, minimising the risk of injury, and for every horse to be provided with a suitable alternative role on retirement with provisions being made to ensure their long-term welfare.

However, we also acknowledge that these provisions are not currently in place, and thus we are faced with a situation where thousands of horses exit racing without a suitable alternative role or retirement plan. In our view, under these circumstances, a ban on the commercial slaughter of racehorses without feasible and more humane alternatives, would be unenforceable and likely to lead to even more detrimental impacts on horse welfare. Until the supply of horses is reduced and more humane options are available, many of these horses would face serious neglect.

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

As stated above, the RSPCA believes that the racing industry needs to do more to adopt responsible breeding practices including reducing the number of racehorses bred, minimising the risk of injury, and for every horse to be provided with a suitable alternative role on retirement with provisions being made to ensure their long-term welfare.

At present, these arrangements vary from State to State in terms of approach and funding. Because the racing industry crosses state boundaries and horses regularly move around the country, retirement arrangements need to have national consistency so that horses are not lost to the system when they cross state boundaries.

Effective retirement arrangements are dependent on a mandatory national horse traceability register.

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?

There is an extensive regulatory gap between export abattoirs, domestic abattoirs and knackeries, as well as the differences in requirements between states. This makes animal welfare regulation challenging especially when horses are commonly transported across state lines for processing. There is currently inadequate traceability for horses when horses are moved between farms, sale yards and abattoirs/knackeries. This inability to easily trace an individual horse through its life time also leads to challenges when investigating animal welfare or disease conditions.

In regards to transport regulation of horses the Land Transport of Livestock Standards and Guidelines which is enforceable in QLD (not enforceable in other states) is inadequate in its welfare requirements. For example, it contains off-water time requirements but no specific off feed time requirements during transport. The off-water time allowance of 24 hours for adult horses during transport is also unacceptable. Even with these requirements in place there is inadequate monitoring or reporting requirements of transporters to record details such as off-water times and arrival times making an assessment of compliance with these standards challenging. These transport standards and guidelines also contain inadequate specification of horse suitable transport vehicles. Additionally, the standards allow for journey times over more than 36 hours when specific requirements are met but there is no documentation or record requirement for feed/water times and regular assessment times, making compliance with these standards difficult to assess.

In Queensland the *Animal Care and Protection Act 2001* and the *Animal Care and Protection Regulations 2012* have inadequate horse specific welfare requirements, with the only specific requirements regarding horses referring to the tail docking of horses and the transport requirements as stated in The Land Transport of Livestock Standards and Guidelines. There are also still no finalised national Horse Standard and Guidelines for animal welfare, as there is for cattle and sheep.

The horse welfare and processing standards for abattoirs and knackeries are also inadequate. The Australian Standard (AS 4696:2007) which focus on food safety requirements has minimal and very generalised animal welfare requirements. The Model Code of Practice for the Welfare of Animals which is not enforceable still allows electric prodders to be used in horses (in yards but not during transport) and has inadequate horse specific standards regarding handling, stunning and slaughter. There are no guidelines for horse specific requirements of knocking box

designs in regards to giving special consideration for horses' height and neck/head mobility in comparison to cattle.

There is no requirement for animal welfare officers on site or CCTV camera footage at abattoirs and knackeries under Queensland regulation. There is inadequate monitoring from the State department of animal welfare at abattoirs and knackeries with Queensland only requiring annual audits of abattoirs and knackeries. These audits are not animal welfare specific and are usually food safety focused. On export abattoirs there is no regulatory power for On Plant Veterinarians (OPVs) in regards to animal welfare other than reporting capability. There is also limited ability for any follow up of any animal welfare incident report that has been made or the action taken in response to the report.

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?

Funding for rehoming programs should be by the industry bodies responsible for the breeding and use of horses: thus rehoming programs for Thoroughbreds should be funding by the members of Racing Australia and retirement programs for Standardbreds by the members of Harness Racing Australia.

Rehoming programs should ensure that horses are tracked for their entire lives, through a National Horse Traceability Register, not just for their first placement after racing.

Programs should ensure they provide adequate funding for retraining of horses to ensure that they are safe and suitable for their new purpose.

Racing bodies should provide a service for the return of horses where their owners can no longer care for them, including services to ensure their humane euthanasia where necessary.

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

Yes, the RSPCA supports the establishment of such a register and provided a submission and supplementary submission to the Inquiry (attached). [The majority of submissions](#) to this Inquiry are also strongly in support of a register.

Further reading

A detailed discussion of the issues associated with abattoirs and knackeries is provided in this recently published article by veterinarian Dr Andrea Harvey:

End of life options for horses and the problems with slaughter. *Horses and People*.
<https://horsesandpeople.com.au/end-of-life-options-for-horses-and-the-problems-with-slaughter/>

We commend this article and encourage you to invite Dr Harvey to provide evidence to the Inquiry.

ENDS

1 March 2019

Committee Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
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Canberra ACT 2600

Via email: rrat.sen@aph.gov.au

Dear Committee

Inquiry into the feasibility of a National Horse Traceability Register

RSPCA Australia welcomes the opportunity to provide a submission to the Inquiry into the feasibility of a National Horse Traceability Register. The RSPCA has long advocated for greater accountability and transparency regarding lifetime tracking of racehorses. A comprehensive national register which is available to the public will help provide community assurance that information is available to review the fate of horses after they leave the industry. The community expects the racing industry to make appropriate provisions for horses upon retirement instead of sending 'spent' horses to the knackery or abattoir.

A national traceability register would also assist in the management and communications relating to emergencies including disease outbreaks and natural disasters, which can help safeguard welfare as well as improve emergency response.

Mandatory microchipping is encouraged as part of a national registration system to help ensure rigour. Where possible, an effort should be made to link with existing databases on the basis that the information relating to all horses is retained in one national database. In terms of costs to operate the system, by sharing existing information, particularly for racehorses, this should avoid duplication and/or omissions, which in turn would result in cost efficiencies. As with other registration systems, it should be user pays but being mindful that costs should be kept at a minimum and for users to understand the benefits and cost savings especially in relation to disease outbreaks, which can be virtually impossible to manage without an effective tracing system. The database needs to be maintained at the national level, preferably by government.

With regard to overseas models, it is recommended that information is obtained regarding cost benefit of databases being used in different countries to help identify the most suitable for the Australian context.

Yours sincerely,



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28th March 2019

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Via email: rrat.sen@aph.gov.au

Dear Committee

Inquiry into the feasibility of a National Horse Traceability Register - Supplementary Submission

RSPCA Australia has already made a submission on the 4th March for this inquiry. However, after further canvassing RSPCA Societies, we submit this supplementary submission. We believe this additional information will be of value to the committee in their deliberations.

The RSPCA would like to emphasise the importance of registering all horses, not just racehorses. Compared to other livestock and companion animals, horses are largely unregulated, yet they can be expensive to care for, require regular care and maintenance, are highly visible and can be dangerous if not handled correctly. Horses are very popular for pleasure riding and competition in addition to racing. In Victoria, the number of horses used for sport and recreation is estimated to be 600,000.

Serious welfare issues can impact horses due to overpopulation and unregistered breeding. For example, a significant issue facing RSPCA inspectors involve owners who do not reside on the property where the horse is located. This is either because they are on agistment properties or on land owned/leased by the owner without a dwelling. This adds a layer of complexity to determine ownership for legal purposes. It can also make it difficult to determine whether an animal has been abandoned or not.

The registry should include horses born overseas and imported into Australia, as well as frozen semen imported into Australia. The horse's date of birth, transfer of ownership and death should also be captured in the registry.

Potential registry models

The National Livestock Identification System (NLIS) has a good model of animal management and traceability that could be used as a reference. Most agricultural departments across Australia define horses as 'livestock' and bar horses are properly tracked and regulated through the NLIS. Therefore, there also must be consistency between the NLIS and the national horse registry system.

Further, Victoria is currently developing a Pet Exchange Register to track the transfer of ownership of domestic cats and dogs. A model similar to this could be implemented for horses, including mandatory microchipping and registration via councils, or some other body.

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Internationally, the recently developed equine register in the United Kingdom may provide a good framework in the development of an Australian registry. Please see: <https://www.equineregister.co.uk/home> and <https://www.gov.uk/horse-passport> and <https://www.legislation.gov.uk/uksi/2018/761/contents/made>

Yours sincerely

A handwritten signature in black ink that reads "Heather Neil". The signature is written in a cursive, flowing style.

Heather Neil
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