

27 November 2019

Mr Terry Martin SC

Inquiry Chair

Inquiry Into Animal Cruelty In The Management Of Retired Thoroughbred And Standardbred Horses in Queensland

Via email: Contact@inquiry.qric.qld.gov.au

Dear Mr Martin,

Thank you for the invitation to provide a submission on behalf of Harness Racing Australia (HRA) to the independent inquiry into the regulatory and oversight arrangements for the operations of abattoirs and other facilities accepting horses for slaughter and the management of retired racehorses in Queensland, including of horses moved from interstate.

As with anyone who has seen the footage shown on the ABC 7.30 report, the harness racing industry was shaken by the lack of control over slaughter processes exposed during the program.

HRA moved quickly following the program to engage with other horse industry peak bodies and also to assist the RSPCA to facilitate a Horse Welfare Roundtable, which will be hosted at our offices in Flemington on 11 December 2019, in an effort to identify changes in laws and regulations that may be needed to better protect the welfare of horses, and to ensure humane processes and controls are in place.

Also subsequent to the program, HRA attended and provided evidence in person at a second Hearing of the Commonwealth Senate References Committee inquiring into the Feasibility of a National Horse Traceability Register for all horses.

Further, a Special Meeting of Harness Racing Australia (HRA) Members was conducted following the 2019 Annual General Meeting in Hobart on Friday, 8th November 2019. The purpose of this Special Meeting being to review the industry's equine health and welfare initiatives.

HRA has a clear focus on improving the health and welfare of all Standardbreds, and whilst succeeding in a number of areas, remains committed to continuous improvement which enriches their quality of life.

HRA believe “*there is no finish line*” regarding the industry’s commitment to equine health and welfare, and this belief is enshrined in both the *HRA Horse Welfare Statement* and *HRA Equine Health & Welfare Code of Conduct* (attached for ease of reference).

Significant progress has been made in recent years to secure the welfare of horses before, during and after their racing careers with some examples being:

- establishment of a highly skilled and experienced welfare reference committee, the Standardbred Welfare Advisory Group (SWAG);
- employment of an Equine Health and Welfare Coordinator;
- implemented continuous rule restriction and moderation on the use of the whip;
- introduced rules controlling the use of tongue ties;
- continuing to lead the world in developing and enforcing the regulation of prohibited substances (global benchmarking statistics available here: <http://www.wtc2019.se/news/global-welfare-integrity-stats-2018/>);
- making the sport safer for the horses, illustrated via ongoing analysis of raceday injury and incidents statistics measured across 2,763,953 starters competing at 37,191 race meetings, which have been reduced to:
 - injuries to 0.27% - equivalent to less than 3 injuries in 1,000 starts
 - euthanasia rate of 0.002% - equivalent to 2 deaths out of 100,000 starters
- introduced microchipping for identification and traceability (2017);
- developed an internationally acclaimed website, www.thereisnofinishline.com.au, to provide the public with transparent information on industry standards, statistics and performance relating to equine health and welfare, as well as integrity functions;
- implemented rules enforcing the formal deregistration of a horse from either racing or breeding activities, rules requiring notification of a horse’s post racing activities and rules requiring notification of a horse’s death rules; and,
- continued investment in successful retraining, rehoming and life after racing activities.

The Special Meeting determined:

1. National Traceability Database

Continued endorsement for HRA’s current policy position to support the introduction of a National Horse Traceability Database as per the HRA submission to the RRAT Senate Enquiry into Feasibility of a National Horse Traceability Register in September 2019 and subsequent evidence provided at Hearings. This includes providing database solutions should such a Register become a reality.

A National Register will ensure the traceability of horses and the responsible horse owner(s) beyond the current rules whereby HRA records the post retirement owner and destination details.

To both promote the relevant rules and enhance the quality of available data, HRA have instituted an immediate blanket call out to the industry and 30-day amnesty (ending on 11 December) to encourage retrospective horse deregistrations prior to the enforcement of even stronger penalties for noncompliance which currently exist.

HRA will also automate contact with horse owners for all horses deemed 'inactive' (not raced or bred with for 2 years or more) within the database, thus improving reporting capabilities.

2. Audit of existing industry processes and data

It was agreed that HRA engage an experienced independent consultant to review all current State and National policies and procedures, including the robustness of data input and data analysis regarding horse traceability within the harness racing industry.

3. Post Racing Activities

The guiding principle for the industry is to ensure that the quality of life of Standardbred horses is preserved at each stage of its life.

While acknowledging that the sport's federated model makes it difficult to achieve a nationally uniform solution, it remains critically important for all State Controlling Bodies (SCB's) to continue to prioritise and enhance retraining, rehoming and life after racing opportunities for as many Standardbreds as possible.

For its part, HRA will continue to assist in the development of these opportunities as well as benchmarking the outcomes achieved by these efforts, including public reporting via www.thereisnofinishline.com.au.

4. Collaboration on Standards for Transport and Destruction

Recent media reports highlight a number of deficiencies and a lack of oversight over slaughter processes at government-controlled knackeries and abattoirs.

While every effort will continue to be made to preserve the quality of life of Standardbreds, it is an unfortunate reality that for a variety of reasons, this is not possible or practical for all horses.

To better protect the welfare and dignity of all horses (regardless of breed), and to ensure humane processes and controls are in place, it was agreed that HRA continue to collaborate with other national equine peak bodies (RA, EA and the AHIC), Governments and relevant regulatory authorities to identify and bring about changes in laws and regulations for urgent reform.

5. Gear & Equipment

HRA has been tasked with undertaking a comprehensive review of the approved gear and equipment used within industry. HRA's expert welfare reference committee, SWAG, has been tasked with the identification of equipment that will in turn be subject to industry consultation regarding its relevance, efficacy and or alternatives which could be used to replace them.

HRA will continue to monitor the adherence, and enforcement, of the current rules surrounding the use of the whip – which are already some of the most stringent globally.

In relation to specific questions asked of HRA in correspondence of 8 November 2019, and not covered above, I provide the following:

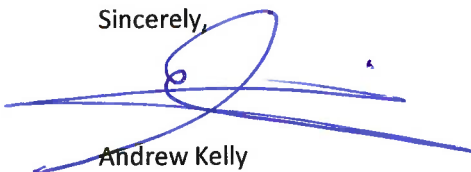
- The Australian Harness Racing Rules provide a raft of welfare related rules by which to regulate equine health and welfare. This includes specific rules relating the timeframe, manner and details required from connections of a horse upon retirement or death;
- All licensing matters are the responsibility of State Controlling Bodies;
- HRA does not apply levies on licensed participants;
- HRA does not provide any breeding incentives;
- The number of Standardbred foals born in the most recent season (2017/18) was 3,335 - a decrease of 38% in just 9 years when compared to 5,345 foals in the 2009/10 season. From an industry sustainability perspective, the number of foals born each year continues to decline and is causing concern, hence the significance of implementing a new handicapping system on 1 July 2019 which provides more and longer lasting racing opportunities to horses of all abilities.

As an industry, HRA acknowledges that we are not perfect, nor is our work complete. However our achievements are real and significant for our horses and we must continue on our pathway to continually improved equine health and welfare outcomes for all Standardbreds.

We look forward to working with you and this inquiry to enhance the health, welfare and quality of life for not only Standardbreds and other retired racehorses – but for all horses, regardless of their breed.

Should you have any further questions or require additional information, please don't hesitate to contact me at anytime.

Sincerely,



Andrew Kelly
Chief Executive
Keeper of the Australian Trotting Studbook



HARNESS RACING AUSTRALIA

EQUINE HEALTH & WELFARE CODE OF CONDUCT

Harness Racing Australia expects those involved in harness racing to act responsibly towards all horses engaged in the sport. HRA firmly believes that the health and welfare of the horse must be recognized as a fundamental concern for all industry participants and that all clubs and state controlling bodies should have appropriate measures in place to ensure neither of these are compromised.

As such the below Code of Conduct must be read in conjunction with the Australian Rules of Harness Racing and participants must foremost acknowledge and accept that;

At all times the welfare of the horse must be paramount and must never be subordinate to competitive or commercial influences.

1. At all stages during the horse's preparation and presentation for racing, the horses' welfare should take precedence over all other demands.

a) Good horse management

Stabling, feeding and training must be compatible with good horse management and must not compromise their welfare. Horses must be accommodated in safe, secure lodgings with adequate shelter and ventilation, high levels of hygiene and with ready access to clean, fresh water and feed. Any practices which could cause physical or mental suffering, whether in stables, training, transport, breeding or racing, should not be tolerated. Practices should aim to fulfil the horse's physiological as well as psychological needs as much as possible, with ample opportunity for the expression of normal behaviors.

b) Training methods

Training methods which cause fear or impose undue restrictions on the normal behavior of racehorses should not be used. Horses should only be given training schedules which match their physical capabilities and level of maturity. They should not be subjected to programs for which they have not been adequately prepared.

c) Hoof care and shoeing

Hoof care and shoeing must be of a professional standard and be maintained regularly at all times. Shoes should be designed and fitted to minimize the risk of injury.

d) Transport

During transportation, horses must be protected against injuries and other health risks. Vehicles must be safe, well ventilated, maintained to a high standard, disinfected regularly and driven by competent persons. Competent handlers must be available to manage the horses.

All journeys must be carefully planned, and on long journeys the horses must be provided rest periods with access to food and water in accordance with Australian livestock transport regulations.

e) Gear and equipment

A person shall not by use of harness, gear, equipment, device, substance or any other thing inflict suffering on a horse nor have in their possession any harness, gear, equipment, device, substance or any other thing capable of inflicting suffering on a horse.

2. Horses should be in a fit and healthy condition before being allowed to race.

a) Health status and veterinary inspections

No horse showing symptoms of disease, lameness or other ailment or pre-existing clinical conditions should be raced.

Whenever there is any doubt, a veterinary inspection should be requested and this should be undertaken before the horse is allowed to race.

Horses with severe or recurrent clinical conditions, e.g. "bleeders" should on veterinary advice, be temporarily or permanently excluded from racing.

b) Doping and medication

Abuse of medication or doping is a serious welfare issue and will not be tolerated. All medications/therapies used must be registered, age and gender appropriate and administered in strict accordance with veterinary and/or manufacturers recommendation.

HRA defines the use of medication and therapeutic treatments into two key areas;

1 - Practices that have no place in the treatment or management of a racehorse:

The use of any object, device or chemical to achieve an inappropriate response, conditioned or otherwise, or to modify performance in any way by causing suffering and / or anxiety to the horse at any time during training or racing.

Subjecting horses to medical or surgical procedures that have not been supervised by a licensed veterinarian and are not consistent with providing medical and/or welfare benefits to the horse.

Practices that are fraudulent, potentially fraudulent or may have adverse consequences for the integrity of the breed or the industry.

Tampering by means of any physical, chemical or physiological interference with a racehorse intended to artificially modify its athletic performance in any way.

2 - Practices that may have legitimate therapeutic value, but should be controlled or otherwise restricted prior to racing:

HRA recognises that there are certain products, procedures and treatment modalities that may have therapeutic benefits when applied appropriately under veterinary supervision. Such practices should be monitored and regulated as deemed appropriate by the regulatory veterinary authority of individual state controlling bodies to ensure adequate control and compliance. Regulation may include the recommendation and enforcement of withdrawal times.

After any veterinary treatment, sufficient time must be allowed for full recovery before racing. One of the main goals of rules controlling the use of drugs and other therapies is to protect the welfare of the horse and the safety of the drivers. Additionally, these rules should prevent unfair competition and the masking of defects which might be passed on at stud.

c) Immaturity

Horses mature at widely different rates. Training and racing schedules should be carefully planned to suit the individual horse and minimize the risk of musculo-skeletal injuries.

d) Prohibited Practices

Any surgical procedures which threaten the horse's welfare and/or the safety of other horses or drivers should not be allowed in racing. Thus, it is forbidden to race:

- Any horse which has undergone a limb neurectomy, defined as the surgical excision of part of a nerve in one or more of its limbs.
- Any horse which has undergone a tracheostomy.
- Any horse which has undergone pin firing or bar firing (thermacautery)
- Inappropriate use of extracorporeal shock wave therapy in a manner that may desensitize any limb structures is forbidden.
- Blood doping
- Mares must not be raced beyond 120 days of pregnancy. Moreover, a mare that gave birth cannot take part in a race for 150 days from the date of birth of its foal. In the case of a mare losing its foal during gestation application can be made for a return to racing 90 days after the loss.

3. Conditions at race meetings should not jeopardize horses' welfare

a) Surface conditions

Race tracks should be designed and maintained to reduce risk factors which lead to injuries. Particular attention should be paid to uneven racing surfaces and extremes of surface quality.

b) Extreme weather

Common sense should be used when racing in extreme weather. Provision should be made to cool horses quickly after racing in hot and/or humid conditions. Horses which have raced in cold weather should be moved inside as soon as possible.

c) Misuse of the whip

Drivers must abstain from any brutality, kicking, boxing, extreme goading or excessive use of the whip. Horses must not be whipped if they are tired, out of contention or past the finish line. The whip cannot be used in quick succession without allowing the horse adequate time to respond. All corrections and prompting must be affected with a rein in each hand and the whip pointed forward and within the confines of the sulky.

d) Racecourse stabling

Racecourse stabling should be safe, hygienic, comfortable and well-ventilated. Fresh drinking water and running water for hosing the horse after racing should be available.

4. Every effort should be made to ensure that horses receive proper care after they have raced, and that they are treated humanely when their racing careers are over.

a) Veterinary treatment

Veterinary expertise should always be available at race meetings. If required the horse should be transported to the nearest referral centre for further assessment and treatment. Injured horses should be given full supportive treatment by the on-course veterinarian before transport which should also be officially documented.

b) Racing injuries

The incidence of injuries sustained in racing should be monitored. Track conditions, frequency of racing, immaturity, and any other risk factors, should be carefully examined to indicate ways to minimize severe injuries.

c) Euthanasia

If injuries are sufficiently severe, the horse may need to be euthanised on humane grounds. Euthanasia should be undertaken as soon as possible, in an appropriate manner, with the sole aim of minimizing suffering. Connections must inform the controlling body of their horse's death within the specified time periods allowed.

d) Retirement

Owners should make every effort to ensure that their horses are sympathetically and humanely treated when they leave racing. Connections must inform the controlling body of their horse's retirement (including reasons for the horse's retirement and its proposed destination) within the specified time periods allowed.

***With thanks to the EUT and IGSRV for their assistance in compiling this document.*



HARNESS RACING AUSTRALIA EQUINE HEALTH & WELFARE STATEMENT

Harness Racing Australia is committed to the humane treatment and welfare of horses. The cruel, abusive, inhumane or neglectful treatment of a horse by any owner, trainer, driver, stablehand or other person must not be tolerated anywhere, anytime and under any circumstances.

- Cruelty can be defined as intentionally causing pain or unnecessary discomfort to a horse. The standard by which such conduct or treatment will be measured, is that which a reasonable person, informed and experienced in generally accepted training and racing procedures, would determine to be cruel, excessive or inhumane.
- Cruelty to a racehorse either in competition or outside of competition must not be tolerated. State Controlling Bodies and Clubs may consider further action and sanctions within the Australian Harness Racing Rules (AHRR), various *Racing Acts* and local regulations.
- Neglect is defined as the failure to provide the basic necessities of life: adequate levels of food, water, shelter, security, hoof care, veterinary care, grooming, or sanitation resulting in poor physical conditions.

Harness Racing Australia is committed to:

- Upholding the welfare of horses as a primary consideration in all activities.
- Requiring that horses be treated with kindness, respect and the compassion they deserve, and that they never be subjected to mistreatment or neglect.

- Ensuring that owners, trainers, drivers and their agents use responsible care in the handling, treatment and transportation of their horses, as well as horses placed in their care for any purpose.
- Providing for the continuous well-being of horses by encouraging routine inspection and consultation with health care professionals and competition/industry officials to achieve the highest possible standards of nutrition, health, comfort, sanitation and safety as a matter of standard operating procedure.
- Continuing to support scientific studies on equine health and welfare.
- Being at the forefront of change and evolution of industry best practice.
- Increasing education in training, horsemanship and breeding practices
- Requiring owners, trainers, drivers and stablehands to know and follow their State Controlling Body's rules and regulations in all equine activities and businesses.
- Tracking the Standardbred at each stage of its journey through the industry.
- Providing pathways and resources for life after racing to facilitate an increasing uptake of retired Standardbred horses into alternative equine pursuits.
- Continuously reviewing, revising and developing rules and regulations that protect the welfare of horses.

Updated July 2019