

PRELIMINARY SUBMISSION TO

The Animal Welfare Task Group

Land Transport of Horses

Consultation Paper

PRELIMINARY SUBMISSION OF
HARNESS RACING AUSTRALIA
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Thank you for the opportunity for Harness Racing Australia (HRA) to provide a submission in response to The Animal Welfare Task Group (the Task Group) *Land Transport of Horses Consultation paper (February 2021)*.

HRA represents more than 48,400 individuals who are involved in the process of producing and preparing Standardbreds for racing in Australia. Of these, there are 24,000 owners of Standardbred racehorses who provide significant capital investment into the industry, over 5,900 trainers and drivers and more than 5,500 breeders. The process of producing and preparing Standardbred racehorses to compete in the industry is worth more than half a billion dollars in direct expenditure alone to the Australian economy. The majority of this is spent in regional Australia.¹

The unique mix of experience; value of the Standardbred population; long standing professional practices; investment in equipment and transport (including design); broad regulatory and disciplinary powers; health and welfare monitoring tools; exposure to international participation and practices; and the ongoing pursuit of high-performance results; places HRA in a rare position to respond to the proposals put forward for discussion.

However, given time constraints and controversial nature of many of these propositions, this response is provided as a Preliminary Submission on behalf of the harness racing industry as HRA seeks to engage further with the Task Group to examine the veracity of the scientific research papers referenced in the Consultation Paper, as well as reconciling the appropriateness of other resources which have been relied upon to develop these proposals in the current form – reserving the opportunity to provide subsequent submissions at appropriate times.

On the surface at least, most, if not all, deal predominately with horses being transported long distances for the purposes of slaughter – which is very different to the transportation of valuable breeding stock or competition racehorses.

For example, Section 7 of the *OIE Terrestrial Animal Health Code* covers Animal Welfare and only references horse transportation within the context of animal slaughter at Chapter 7.5²,

¹ Size & Scope of the Harness Racing Industry in Australia, IER Pty Ltd, May 2013.

² https://www.oie.int/fileadmin/Home/eng/Health_standards/tahc/2018/en_chapitre_aw_slaughter.htm

while an Independent *Inquiry into animal cruelty in the management of retired Thoroughbred and Standardbred horses in Queensland* (the Martin Inquiry) also contained recommendations focussed primarily on horses being transported for the purpose of slaughter.

The Martin Inquiry Report also made comment that, “Racing horses are commonly transported and often travel long distances to races, studs and spelling facilities. Horses that still have a racing career are considered valuable and usually afforded optimum care to ensure they are not injured or unduly stressed during the journey”.³

Not surprisingly, HRA agrees with this observation, however, it also supports national legislative reform of Standards and Guidelines for the Land Transport of Horses predicated on the purpose or intention of the journey, while maintaining dignity and mitigating undue stress for those horses where it is needed - for horses more generally when being transported for slaughter.

There is no evidence that the current professional transportation practices within the harness racing industry require any type of intervention, be they legislative or otherwise. Indeed, HRA established, and have maintained, an *Incident & Injury Register* since 1 April 2010 which captures the veterinary examination of each horse at a racetrack. As of 26 March 2021, this register contained data on 2,922,828 starters transported to 39,313 race meetings, illustrating the minimal risk associated with the transportation of Standardbred horses.

One would expect that the relationship between welfare, transport and performance seems strong, but with horses retaining up to 80-litres of free water in the hind gut⁴ (possibly more depending on fibre in the diet), it is not surprising the science appears far from settled on this issue as water shifts from the gut to maintain peripheral circulation.

For example, conclusions from Barbara Padalino, in a PhD thesis⁵ titled *Transportation of horses and the implications for health and welfare*, submitted in fulfilment of the requirements for the degree of Doctor of Philosophy, recommends offering food and water at

³ Report: (Martin) Inquiry into animal cruelty in the management of retired Thoroughbred and Standardbred horses in Queensland Page 66 (accessed via: <https://www.publications.qld.gov.au/dataset/management-retired-thoroughbred-standardbred-horses-final-report/resource/be9739b1-d952-4b73-81af-92cbcf414c7f>)

⁴ Personal Communication with Dr. Gregory T Hargreaves BVSc, Grad. Dip. Ed. (2021).

⁵ Padalino B. Transportation of horses and the implications for their welfare 2017. PhD Thesis. (accessed via: https://ses.library.usyd.edu.au/bitstream/handle/2123/16906/padalino_b_thesis.pdf?isAllowed=y&sequence=1)

least every 4 hours. The thesis also makes the point that “surprisingly little is known about the effect transportation has on performance with the results of studies often conflicting”.

This conflict, particularly regarding water intake if intended to link with transport and performance, is illustrated in studies such as, *Distances travelled by feral horses in 'outback' Australia*⁶ which concluded that, “The distances travelled by feral horses were far greater than those previously observed for managed domestic horses and other species of equid. Feral horses are able to travel long distances and withstand long periods without water, allowing them to survive in semi-arid conditions.”, and another titled *Water homeostasis in desert-dwelling horses*⁷ which concluded that, “that horses can easily tolerate water deprivation that results in a 12% reductions in body mass”.

It should be made clear, HRA does not advocate the deprivation of water, simply that it is difficult to be prescriptive in this area given so many other factors at play including diet, travel preparation and destination.

With the harness racing industry dedicating substantial resources to welfare and regulation, the activities of industry participants are heavily and constantly monitored. Despite this focus and the strict regulatory frameworks which provide broad powers to integrity staff, including entry, search, and direction powers for Stewards, other than two historical instances, both on extreme long-haul journeys, HRA is not aware of any inappropriate transportation or adverse effects of travel on Standardbreds.

As an example of this focus, in 2018/19 alone, Stewards and Veterinarians undertook 1288 private (out of competition) stable inspections, presided over 14,000 race meetings and studied 9831 horses making 127,101 race starts. This is in addition to stud, yearling preparation, and sales/auction inspections.

It is worth noting that any proven breaches of welfare rules within the Australian Harness Racing Rules (AHRR's) can be met with penalties including directions, notices, fines, suspensions, disqualifications and “warning off” which can directly impact the livelihoods of

⁶ B A Hampson, M A de Laat, P C Mills, C C Pollitt - Distances travelled by feral horses in 'outback' Australia (accessed via <https://pubmed.ncbi.nlm.nih.gov/21059064/>)

⁷ J C Sneddon, J G van der Walt, G Mitchell - Water homeostasis in desert-dwelling horses (accessed via <https://pubmed.ncbi.nlm.nih.gov/1917731/>)

industry participants and related persons. Any welfare concerns identified as being relating to transport within the wider industry would be dealt with under these disciplinary structures aside from, and regardless of action taken or not taken within legislation frameworks (as it routinely does – for example, the movement of horses during Equine Influenza lockdowns in 2007).

Further proof of suitable and practical transportation of horses within the harness racing industry is the continued improved performance of Standardbreds as evidenced via:

- The average race starts per Standardbred per season increasing from 10.7 in 2000/01 to 12.9 in 2018/19; and,
- Race Times, which have improved rapidly over the past decade:
 - From 4331 sub-2:00 (minute) performances in 2010/11 to more than double, at 8766 in 2018/19
 - From 92 sub-1:55 (minute) performances to a staggering 1466 in 2018/19.

Standardbred performance may be impacted by heat, but to this end, the harness racing industry has comprehensive and effective Hot Weather Policies in place. A day with high ambient temperature, low humidity and a reasonable breeze would not typically cause adverse effects on a Standardbred acclimatised to typical Australian conditions.

Standardbreds are most likely to be adversely affected by heat on days of high ambient temperature, high relative humidity, and low wind speed. This would be described as a day of high thermal load.

Although horses cool themselves extremely efficiently through evaporative cooling, this process can lose its effectiveness on days of high thermal load (high ambient temperature, high relative humidity, and low wind).

Combining data accessed via <http://www.bom.gov.au/products/IDV65079.shtml> and the use of a Wet Bulb Global Temperature (WBGT) thermometer at the racecourse, Stewards and Veterinarians inform themselves of the thermal load and implement protective procedures when the forecast ambient temperature is 38 degrees Celsius or above, or the WBGT shade is 28 degrees Celsius or above, with no adverse effects to the Standardbreds welfare or performance.

HRA also maintains a robust traceability database which was referenced in a submission from the Australian Veterinary Association Ltd to the Martin Inquiry which quotes, “EVA does concede that Harness Racing Australia has taken serious action on this issue in the last 18 months by making owners update activity status of Standardbred racehorses in ‘real time.’”

HRA would welcome the opportunity to present this data, and performance related documents directly to the Task Group as it continues to review and consider amendments which may be harmful or impacting the harness racing industry.

HRA provides the following commentary on other proposals contained within the Consultation Paper:

- Not all stress should be considered, by definition, harmful to horses.
- Horses have an amazing capacity to dissipate heat.
- It is probable that in many circumstances, the practicalities, let alone the potential benefits gained from stopping regularly (eg. every 4 hours) are outweighed by the risks associated by doing so.
- Bedding: straw can be very slippery and creates a slip hazard that rubber does not. The removal of manure and urine is a more important factor when considering bedding.
- The value of breeding stock, including Stallions, Broodmares and Foals dictate they are provided high standards of care and risk-free transportation.
- Lying down for an adult horse during transport is probably more dangerous than standing, including on long routes.
- Provision should be made for any proposals concerning foals to allow transportation in times of emergency such as lifesaving surgery (including with the Mare), or to the property of a foster mare if a foal’s mother has died.
- Environmental, cultural, economic, weather and road conditions mean that the style or type of transport used in various jurisdictions (particularly Europe, Scandinavia, and North America) differ greatly and make comparison with Australia extremely difficult be they breeding, sport, competition, or recreational sectors.

In conclusion, the harness racing industry is well placed, with longstanding, successful industry practices and resourced appropriately to manage the transportation of Standardbreds without compromising on either their welfare or ability to perform to full potential. It is hoped that this, and subsequent consultation phases, maintain provision and flexibility for the harness racing industry to afford each Standardbred with transportation which can be tailored for any specific or individual need to maximise safety and mitigate risks for them and their handler.

Prescriptive amendments to the Australian Animal Welfare Standards and Guidelines concerning the land transport of horses should only be directed to situations where the welfare of horses could potentially be compromised.

As mentioned earlier in the submission, HRA looks forward to further engagement with the Task Group and opportunity to build upon this submission in its current form. The author, Andrew Kelly, can be contacted at any time at akelly@hra.com.au