

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Committee,

The feasibility of a National Horse Traceability Register for all horses

1. The current systems in place for traceability of horses in Australia are adequate. There is no need for a 'national register'. Horse movement and registration is not a federal issue and is not something the commonwealth should be concerning itself with. It is not an issue which the Commonwealth can legislate unless all the states agree, it is not under a head of power in the *Constitution*. The introduction of a mandatory register will create implementation and enforcement problems - and could pose a serious risk to horse welfare.

The existence and adequacy of state or industry-based registers;

2. There are numerous industry based registers in Australia which can be used to trace the movements of horses. These include the Australian Studbook Register,¹ Australian Stock Horse Society Register,² Equestrian Australia.³ There are dozens of other societies which offer animal registration.

3. These registers allow people to register their horses. In order for people to take their horses to events where there are other horses, such as races and shows, the horse must be registered with one of these organisations. These organisations hold records of which horses were at events, how many horses are registered, where the horses are located and who owns them. People who move their horses frequently will already have their horses registered.

4. People who do not have their horses currently registered are unlikely to adopt any voluntary system and may not be willing to comply with new regulations. There is no need to introduce any new legislation about horse movements.

Comparison with other animals

5. Other species of animals such as cattle and sheep which are used for human food are required, by laws in each state (not federal laws) to be 'traceable'. The animals must have an ear mark or other approved identifier. When animals are moved or sold, the movements are

¹ For tracing movements of thoroughbred horses registered in Australia <https://www.studbook.org.au/>

² For Australian Stock Horses www.ashs.com.au/horses/onlinestudbook.asp

³ For horses competing in Australia <https://www.equestrian.org.au/members/search/horse>

recorded in a register and can be traced. This is important for livestock which are used for food as there is obviously a need to protect the health and safety of people. If there are issues with food production, the NLIS allows that issue to be isolated and any associated animals can be removed from the chain.

6. Horses are typically not used in Australia for human food. Horses are often treated with a medication called phenylbutazone which remains in the meat for the life of the horse. If a person consumes meat from an animal which has been treated with phenylbutazone, it is possible, albeit very unlikely,⁴ that the person could contract aplastic anaemia which can be fatal.⁵

7. If there are concerns about horses used for human consumption, those horses could be identified and traced in the same way that sheep and cattle are. Burdening every horse owner in the country with another fee and registration for the benefit of the few people who produce horses for human consumption is unnecessary and absurd. There is no evidence to suggest that there have been any health issues in Australia from people consuming horse meat

8. Dogs and cats are required to be registered with local councils. That is governed by state and local laws, not federal laws. There is a need to register cats and dogs because they are animals which can be a nuisance. Dogs bark, chase people, kill livestock and pets and the owners need to be able to be found. Cats roam, kill birds, damage property and are, in general, a nuisance when they are at large.

9. Horses are not animals which are known to escape frequently, chase other animals, attack people or spend all day barking and annoying the neighbours. There is no need to have any register let alone a national register for horses.

“Benefits” of a national register

Animal welfare

10. There is no evidence to suggest that a national register, or any type of register would improve animal welfare outcomes. People who do not look after their animals and who mistreat animals are unlikely to register their animals anyway. Being cruel to animals is already illegal – in order to use ‘animal welfare’ as an argument for the need to have a national register there would need to be evidence of *how* this proposed register would actually improve animal welfare.

⁴ Shutting the door after the horse (on phenylbutazone) has bolted. *Veterinary Journal*. 2013;196:273. doi: 10.1016/j.tvjl.2013.05.001.

⁵ Worboys, Michael, and Elizabeth Toon. “Phenylbutazone (Bute, PBZ, EPZ): one drug across two species.” *History and philosophy of the life sciences* vol. 40,2 27. 26 Mar. 2018, doi:10.1007/s40656-018-0191-4.

Biosecurity safety (including for the prevention and management of Emergency Animal Diseases, such as equine influenza and African Horse Sickness),

11. In each state horse owners are required to be registered with their local department of agriculture. In Western Australia all horse owners are required to have a Property Identification Code (PIC)⁶. When applying for the PIC the applicant must state which species of animals will be on the property and how many of each species. In WA, you then receive email updates about animals you have on your property.

12. Further, how does a national register help with biosecurity? Is someone at the register going to phone each person who has a horse? Is there going to be an email sent out which ends up in junk mail? In any event – the most effective way to get information to horse owners in this modern age appears to be via the mass media and social media. During recent outbreaks, social media has spread the information much faster than any government department could.

Backyard breeding and the integrity of trade in horses

13. Again, suggesting that a national register will have any impact on ‘backyard breeding’ is absurd. What is backyard breeding? Who is a backyard breeder? Is ‘Backyard breeding’ an issue? How will this register ‘assist’ in monitoring or doing anything regarding backyard breeding.

14. As for the integrity of trade in horses, apart from that sentence being meaningless garbage, again, there is no way a national register will help.

15. In the same way that making heroin illegal stops drug dealers, creating some meaningless national register will not stop people who do the wrong thing from doing the wrong thing.

Safety for riders

16. Senator Faruqi has suggested a register will have an impact on rider safety. That suggestion is completely absurd. For a register to have any impact on rider safety it would need to have each horse assessed by a qualified person to determine if the horse is safe, if the horse is sound, the level of training etc. That is not going to happen and it is all a matter of opinion anyway.

17. Rider safety is an issue for the owner of the horse. A register does not ensure that someone is using a riding helmet or a body protector or riding correctly. It does not stop someone from using ill fitting gear which can cause pain and adverse behavioural responses in horses. The owner needs to take appropriate steps to ensure the horse is suitable for the rider. There is no way a register can do that.

⁶ *Biosecurity and Agriculture Management (Identification and Movement of Stock and Apiaries) Regulations 2013 (WA).*

Combating rural crime

18. Senator Faruqi suggests a register will help combat rural crime but has not suggested how a register will do that. The reason Senator Faruqi has not said how a register will combat rural crime is because it won't.

Overseas models of national tracking systems for horses

19. In Europe there is tracking of horses. Each horse has a 'passport' which is required to be filled in when horses are moved and medications are given. The passports create huge problems when they are lost or damaged (which happens easily when you are dealing with a physical document and large animals outside).

20. In the UK alone there are over 70 organisations which issue horse passports. Various breed societies issue them. There are numerous issues with the passport system in Europe and there have been food quality issues since the introduction of the passport system.

21. Again, people who do the wrong thing continue to do the wrong thing and do not complete the passport. The purpose of the European horse passports seems to be primarily for the purpose of stopping contaminated horse meat from entering the human food chain. That is not an issue in Australia as horses are not typically eaten by people.

22. Overseas, horses are required to be traced even once deceased – is that going to be the case here?

Funding

23. Inevitably the cost of this new system would be borne by the people who use it – the horse owners. Is this system going to require all horses to be microchipped or have a new brand applied? Does the system make an owner pay per animal or pay per property? For people with a number of horses, it could be quite expensive to introduce the new system and all for no apparent purpose. People who already have their horses registered may have them registered with one or several societies. Some horses are registered with three or more societies depending on the activities they participate in. Each membership can cost \$100 or more per year. Adding another registration serves no purpose and just generates problems for horse owners and enforcement agencies.

Enforcement

24. The department responsible for any such system should be a government department – I would suggest the local department of agriculture. Having an NGO such as the RSPCA involved would be pointless and not in the public interest. The various Acts which govern animal identification and movement would need to be amended. I suggest the powers would

need to be limited as the current powers under the *Biosecurity Agricultural Management Act 2007* (WA) are wide and unnecessary for animals which are not entering the food chain.

Penalty implications

25. Equine vets could be at risk of prosecution if horse owners do not comply with the requirements. What are vets obliged to do? Under the *Animal Welfare Act* and the *Veterinary Surgeons Act* the vet is obliged to do certain things. When a vet is required to something to a horse, does need to be recorded in some manner in a 'passport'? What is the vet meant to do if the owner did not bring the passport? Wait for the horse owner to go home and find the passport before treating the horse and be at risk for prosecution under the AW act or the VS act or proceed without the passport and face a prosecution under the new traceability act?

26. What happens to people who 'rescue' animals and brumbies which have no registration?

27. If the horse needs to be euthanised, does the body need to be traced until it is disposed of? What is the consequence of failure to have the ID with the horse when it is disposed of? What happens in an emergency situation where a horse is killed somewhere other than the owners property- is the truck driver who moves the carcass required to trace the animal to the disposal facility then what? Is he meant to register the horses as 'dead and buried' or is it the owners responsibility?

28. What happens when horses are abandoned at agistment centres and owners are unable to be contacted? Does the agistment owner then become responsible for the traceability of the horse and what is the consequence of non-compliance? Is it the responsibility of the horse owner or the person who looks after the horse on a day today basis to make sure the animal is registered and kept up to date?

29. What are the penalties? A fine, jail, ban from keeping animals? Who is responsible for ensuring the animal movement is recorded; vets, owners, trainers, agistment centres, truck drivers, knackereries?

Other

30. What info will be kept on this register? Horses age, breed, brands, microchip, owners details, owners criminal record, record of how many horses the owner has, where the horse is kept? All of this information is private information. Who will have access to said information? As a horse buyer would I be able to access the information to ensure the horse I am buying is the one I believe it to be? Are the horses medical records going to be stored there? Will insurance companies have access to this?

Summary

31. The whole idea of a national register is a complete waste of time and money. It is not something that the commonwealth government can legislate. It can only be legislated through the states, which already have details of animals kept on properties. There is no way a national register can do any of the things that are suggested it will do such as improve animal welfare, stop backyard breeding and help biosecurity. It would be an embarrassing waste of money to attempt to implement a national system for horse traceability. If the concern is about animals ending up in the food chain, then that should be addressed with the people involved in that very small industry, not with horse owners in general.

Should you wish to discuss the matter or if you release further information on this issue, please contact me.

Yours faithfully

Karrie Loudon, B.Agribusiness, Llb