

24<sup>th</sup> October 2022  
Animal Welfare Program  
Department of Agriculture and Fisheries  
GPO Box 46 Brisbane QLD 4001

KN:MD

**RE: Improving the welfare of horses during land transport**

Animal Care Australia (ACA) is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

ACA Horse members include organizations and individuals representing recreational horse owners, competitive equestrians and trainers, as well as petting farms, zoos, rescues/sanctuaries, and education/therapy horses. Our members are responsible for equines across the broad range of species, types and breeds, including donkeys, zebra, miniatures, drafts and including handled and unhandled horses.

- ACA supports the proposed regulatory approach including the proposed revisions to the National Standards for Horse Land Transport, with some additional recommendations.
- ACA notes that a one size fits all approach is not suitable or practical. Equines that are very large or very small have not been appropriately addressed in the revisions, and allowances must be included to accommodate animals that are not of an average size to prevent unintentional or unavoidable breaches of the Standards.
- Exceptions for emergency travel situations that prioritize safety or welfare over the Transport Standards in certain situations must be also be explicitly recognized.

We thank you for the opportunity to comment on the Consultation Regulation Impact Statement. Please do not hesitate to make contact if we can assist further.

Kind regards,



Michael Donnelly  
President  
0400 323 843



Animal Care Australia  
2022

# Improving the Welfare of Horses During Land Transport

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Approved: 24<sup>th</sup> October 2022  
Animal Care Australia Inc.

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# Improving the Welfare of Horses During Land Transport

Animal Care Australia submission.

## ACA Background:

Animal Care Australia Inc. (ACA) represents the interests of all hobbyist and pet animal keepers nationally. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, fish and exhibited animals.

ACA Horse members include organisations and individuals representing recreational horse owners, competitive equestrians and trainers, as well as petting farms, zoos, rescues/sanctuaries, and education/therapy horses. Our members are responsible for equines across the broad range of species, types and breeds, including donkeys, zebra, miniatures, drafts and including handled and unhandled horses.

## Opening statement:

ACA broadly supports the proposed revisions of the national standards for horse land transport, including the proposed improvements to the standards and regulations. ACA highlights that equines that do not conform to a standard, mean size has not been sufficiently acknowledged in the CRIS, and our recommendations to address this follow below.

## ACA's Response to the Consultation Regulation Impact Statement:

### Section 1: The problem

**1.1** ACA agrees that horses have different transportation needs to livestock and companion animals.

**1.2** ACA highlights the 5 Domains Model of Assessing Animal Welfare IS suitable for assessing horses in transportation. The term "Animal Protection" is not synonymous with Animal Welfare in Australia, but with Animal Rights, and the focus of this review must remain on improving Animal Welfare. Animal Rights is an extreme minority of individuals, who should not be confused with the general community granting 'Social Licence to Operate', just because Animal Rights Extremists are louder than the general community.

The perceptions that *horse slaughter is Always Bad*, and *Every Racehorse is abused* and other over simplified assumptions are more of a public education issue than a welfare one. The species specific needs of horses are frequently misunderstood by the public, even by many horse owners themselves.



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Education is essential, and needs to be supported by government as well as from within the horse industry, with reliable information that is easy to access. The horse industry needs to put additional effort and resources into actively raising welfare standards to ensure that welfare is not only constantly improving but also that this is visible to the general public.

**1.3** ACA Members report that they see professional horse transporters voluntarily exceeding the current national standards.

## **Section 2: The need for government intervention**

**2.2 -2.4** ACA agrees that self-regulation is not possible by the horse industry at this time. The industry lacks cohesion, and national oversight. The opportunity presented by the development of the National Horse Traceability Register did present the perfect opportunity to draft new fit for purpose legislation for the horse industry as recommended by ACA at the time of stakeholder consultation. This would have also presented the opportunity to include self-regulation of the Transport Standards. However this opportunity was missed, and compromises must now be made at every level going forward.

## **Section 3: Policy Options**

ACA supports Option 3: Regulatory approach

## **Section 4: Benefits and impacts**

ACA **supports** all of the following proposals in the Consultation Regulation Impact Statement (CRIS), with some suggested refinement:

✓ **4.3.1** provision of water, feed and rest during the journey, including the reduction to the maximum journey time

✓ **4.3.2** ACA supports Record Keeping sub option B.

Recreational horses are transported frequently on short journeys and return to the same location, usually on the same day. Many horse owners must transport their horses to access safe off-road riding, or undercover venues when the weather is unfavourable, and may travel daily. Requiring horse owners to keep detailed transportation records for what, to horse owners, is no different to transporting your dog to the park for their daily walk, is overreach, over regulation and unnecessary.

✓ **4.3.3** Segregation of certain animals during transport including the exceptions and adopting the “handled” or “unhandled” descriptors. Standards must allow for livestock paddock

companions of transported horses to travel together.

✓ **4.3.4** Removal of hind shoes in certain situations

✓ **4.3.5** Space allowance

ACA emphasises that horses come in a wide range of heights, widths and weights, from the very small, to the very large. Standard horse transport frequently does not fit the very large, nor the very small. Bay widths should be proportional to the equine being transported, even 1.2m is excessively wide for a small pony or miniature horse.

The Standards should state:

“bays and height clearance be suitable for the type and size of equine being transported”.

The regulations should specify that 1.9m is recommend for an “average sized horse” and does not apply in every circumstance, to allow for appropriate customisation when required. If a measurement alone is stated as the recommendation, anyone transporting an extra-small or extra-large equine, in custom sized bays (as pictured below) would not be meeting the regulations despite significant improvements to welfare and safety, beyond what is required by regulation.



*Picture: the very large and the very small equines simply do not fit in standard, commercial horse transport. This vehicle has been customised to safely transport two (2) miniature horses, with rear facing bays, a reinforced cargo barrier, and additional ventilation.*

Emergency transportation to evacuate from danger, get to a vet, or one off relocations sometimes requires a work around to safely transport a horse in less than ideal circumstances. Provisions need to be included that allow for one off, or short/emergency journeys in less than perfect transportation. This should allow for welfare concerns to be justifiably prioritised over the standardised space

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allowances, for example. This is especially true for the very large and the very small and relates particularly to emergency situations such as natural disasters, urgent veterinary care or due to tow vehicle/trailer breakdown. Horse owners should not have to make a choice between meeting their urgent horse welfare needs OR complying with the transportation standards, especially in an emergency situation.

- ✓ **4.3.6** Use of restraints
- ✓ **4.3.7** Bedding and flooring
- ✓ **4.3.8** Multi-deck trailers
- ✓ **4.3.9** Fit for the intended journey
- ✓ **4.3.10** Mitigating welfare risks in extreme temperatures