

Monday, 19th December 2022
Dept of Primary Industries & Regional Development
Government of Western Australia
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KN:MD

ACA Submission to Standards & Guidelines for the Health and Welfare of Horses in Western Australia, Consultation Paper, 2022

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 commends the Dept of Primary Industries & Regional Development (DPIRD) on its draft Standards & Guidelines for the Health and Welfare of Horses in Western Australia. We are pleased and relieved to see that the draft is founded on a solid Animal Welfare base, without Animal Rights ideologies that have added confusion and controversy to similar Acts in other states. When Welfare is prioritised, sound, measurable and practical Standards follow.

ACA is pleased to see that the wide range of equines from the very small to the very large have been considered with practical and achievable phrasing in the Standards and Guidelines, as well as the additional information contained in the Appendices. Again, in other states, we have encountered strict measurements that can sometimes be impractical for many equines that are not of a standard size, and we wish to recognize DPIRD's efforts to meet the wide range of needs of the equine community.

ACA does question why donkeys and equine hybrids have been excluded at this time? We feel that, at the very least, an additional appendix be included for species specific information. Donkeys and equine hybrids have similar needs, and are often kept together with *Equus caballus* companions, and for this reason, we are concerned to see their exclusion.

RSPCA's ability to accurately assess the welfare circumstances during their investigative process has been repeatedly called into question, and ACA queries what equine specific training RSPCA inspectors will receive to appropriately enforce the new standards?

ACA is pleased to see the results of recent scientific studies included in the Draft to restrict overtightened nosebands, and other severe gadgets as well as limits on excess carrying weights.

ACA notes two glaring omissions, both relating to maturity and age of horses and make the following recommendations:

Recommendation 1:

Definition of an “Aged Horse” should be raised from 16 years to 20 years of age

Recommendation 2:

Introduce an additional Guideline recognising the age of full skeletal maturity prior to horses and ponies being ridden or driven

Definition of an “Aged Horse” should be raised from 16 years to 20 years of age

By modern, first world standards such as in Australia, 16 is not old for a horse, its middle age. The stigma of the term “aged” makes rehoming of rescue horses and off the track Thoroughbreds and Standardbreds much more

difficult, due to the word alone, despite being healthy, fit and having many years of life ahead of them. It is not until the age of 20 that a horse's teeth require more attention. Other health issues relate to the horse's quality of life up to that point, not its age.

Australia's most awarded sportsman is equestrian Boyd Exell, who competes in international combined driving - including the Olympics - with his teams of driving horses. Exell has competed at a professional, international level for decades with horses aged up to their mid- 20's. Exell is a prime example of how proper care of horses ensures that they enjoy a long, healthy, and productive life. While Exell currently lives in Europe, his horses are no different to our Australian horses, and ACA feels that if we are serious about raising welfare standards for horses, we need to stop describing a short and poor-quality life as acceptable, by legally labelling a prematurely worn-out horse as "aged."

Age is never an excuse for underweight or malnourished horses. Age is not a cause for weight issues, it is a preventable management issue – primarily due to under feeding or inappropriate feed.

ACA believes Guideline 6.1 describing the need to increase vet visits annually for "aged horses," should apply more broadly, not just those more likely to be neglected or using age as an excuse for a poor standard of care. Prevention comes from education, and those early veterinary interventions are key to ensuring preventable health issues are addressed before they can no longer be reversed.

Recognition of the age of full skeletal maturity prior to horses and ponies being ridden or driven

ACA notes that despite the many inclusions of modern, scientifically backed animal welfare standards and guidelines included in this draft, the requirement for full skeletal maturity prior to weight bearing has been worryingly omitted.

Starting a skeletally immature horse under the age of 5 is of a high animal welfare concern, and while many horses in racing, rodeo and ponies ridden by children go on to careers where their rider is well under the 20% weight limit introduced in the Draft Guidelines, the initial trainer of the horse is not likely to be so feather light, and this raises a genuine welfare concern that impacts the horse long term.

The vertebrae of the horse's spine are the last bones to fuse (where the soft cartilage-based growth plates fill with calcium and become solid and strong) at around 5.5 years of age. This has been recognised by scientists researching biomechanics for decades before the 20% weight limit guidelines were assessed and recommended. As these bones are horizontal and expected to bear a rider's weight as well as saddle and other tack, it is no longer acceptable to equine welfare advocates to start horses weight bearing before the spinal vertebrae is mature.

Horses should be undergoing non-weight bearing training prior to this time to prepare them physically and mentally for the rider after the age of 5.

This is also closely related to our first recommendation. Horses started after full skeletal maturity have longer, healthier lives, and the long-term studies are just now being published in support of this. The early starting of immature horses cannot be overlooked as a common and preventable cause for the early, declining health of otherwise middle-aged horses – who we then label as "aged."

ACA therefore recommends that ***horses not be ridden or driven before full skeletal maturity*** is inserted as a Guideline into section 18: Education and Training.

Please do not hesitate to make contact if we can assist further.

Kind regards,



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