

14th May 2024

FEI Secretary General Sabrina Ibáñez
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Lausanne, Switzerland

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RE: FEI Equine Welfare Strategy

Animal Care Australia 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.

Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, companion animals, animals used for educational or entertainment purposes or kept for conservation.

Animal Care Australia commends the Equine Ethics & Wellbeing Commission Final Report for its recommendations for FEI to introduce horse welfare science, Ethics and Regulation for its horses in sport. Animal Care Australia supports a Good Life for Horses.

It is long overdue that FEI also adopt these principles and in principle Animal Care Australia supports the adoption of all thirty recommendations by the FEI and its National Federations (NFs). Animal Care Australia also agrees with all of the concerns identified within the Six priority areas of focus on pages 11-12 of the Final report.

Animal Care Australia’s main purview is animal welfare and accordingly our focus in this response is directly related to welfare improvement outcomes.

Recommendation 7: Develop and implement a robust FEI internal decision-making process to ensure that equine welfare and ethics are genuinely prioritised in the development of FEI policy and in practice.

For many years we have observed an obvious disconnect from the welfare standards promoted by FEI and what we see in competition and training – at all levels. Hiding rollkur from view when it occurs in warm up arenas at elite events rather than instantly disqualifying those competitors is just one obvious example.

Over the decades, FEI and its NFs turning a blind eye to welfare issues has resulted in the same behaviour trickling all the way down to the grass roots organisations and instructors. This in turn has led to an increase in heavy handed, unbalanced riding to hold horses’ noses in BTV (behind-the-vertical) and is becoming more commonplace.

The results of the Equine Ethics and Wellbeing Commission - Public and Equestrian Survey Results on page 7 seem to show that the more heavily involved someone is in their NF and FEI, the less objective they are to the welfare needs of the horse. This needs to change, and higher-level equestrians need to be held to a higher standard, not a lesser one. They should be role models of Best Practice, not demonstrate that the rules do not apply to them.

Recommendation 6: Create a permanent internal FEI Equine Ethics and Wellbeing ‘body/office’ to advocate specifically for the welfare interests of horses in sport, providing a ‘voice for the horse’ and supporting the FEI in ensuring welfare is paramount.

and,

Recommendation 24: Establish a permanent FEI Equine Ethics and Wellbeing Independent Advisory Committee to act as a ‘critical friend’ and provide an external perspective and independent advice related to the welfare of horses in sport.

Animal Care Australia supports Recommendations 6 & 24; however, we question why these do not already exist given the levels of increased scrutiny surrounding horses in sport and at the Olympics.

The FEI and NFs should at all times hold the welfare of the horses as a paramount concern and conduct constant and effective reviews of even the slightest hint that an equestrian, or member of a Board behaves in a way that

brings the welfare of the horses into disrepute. The role of the Ethics and Welfare body should be built into the job requirements for all FEI/NF Boards and decision makers.

Animal Care Australia would be greatly concerned where the FEI and its NFs did not already approach equestrian sports with the horses' best welfare interests in mind.

Clearly, from the findings, there has been sufficient input that this has not been occurring, therefore requiring the establishment of an independent advisory panel to speak for the horses. Animal Care Australia welcomes the addition of an outside voice, and we would hope this Panel is provided the necessary tools and opportunity to educate all participants at all levels from riders to Board members. The continued improvement of animal welfare is the constant responsibility of all concerned, particularly the FEI who can most certainly lead by example. This change must be implemented as a matter of urgency. It needs to begin at the top.

Recommendation 4: Promote only ethical and evidence-based equestrianism. Ensure ongoing development of an understanding of the importance of utilising ethical, evidence-based practices in horse training, management and performance.

Animal Care Australia supports the 5 Domains of Animal Welfare being the model for determining a 'Good Life for Horses'. Animal Care Australia notes the absence of how FEI and its NF's will be enforcing this? Of particular concern is the lack of inclusion of the times when the horses are not being trained, managed or performing. We remind you that animal welfare and the best interests of the horses is a fulltime responsibility – even for the organisations – not just the owners/riders.

Animal Care Australia strongly recommends the FEI, and its NFs make a concerted effort to educate its members in scientific literacy. Another huge burden to overcome are the unfounded traditions that have historically been built into each disciplines' rule books leaving the science out! This will require more than a simple document or signed agreement 'to do better'. This will need continued assessment, evaluation, re-evaluation and enforcement when compliance is not being adhered to.

Recommendation 17: Ensure that all FEI stakeholders commit to the 'FEI Equestrian Charter' (See Figure 6). A public facing statement about the commitment equestrians make to ensuring the wellbeing of the horse.

Animal Care Australia supports the proposed FEI Equestrian Charter, but again asks how will it be enforced?

As stated above, all Members must be held accountable! FEI must ensure and put measures in place to ensure the NFs are genuinely committed to this change.

The Final Report appears to be primarily concerned with Social Licence to Operate and the potential ramifications of losing public support for equestrian sport, rather than a genuine concern for the horses involved in FEI sports. To Animal Care Australia the Report has it backwards. If FEI were to focus on the improvement of animal welfare, the compliance of animal welfare then the social license to operate would follow because everyone will see that things are changing, and actions are being held accountable.

Recommendation 8: Adopt a transparent and evidence-based approach for assessing the impact on horse welfare of new and existing items of tack and equipment in training and competition. Prioritise individual equine welfare in relation to the regulation of new and existing tack and equipment, being prepared to de-regulate tack because of risks to equine welfare.

Animal Care Australia supports the adoption of evidence-based decision making and the phase out of anecdotal traditions that do not support positive horse welfare outcomes.

Recommendation 15: Proactively track and monitor 'Social licence to operate' and progress in relation to equine welfare, through use of a dedicated assessment tool (a 'Social Licence Dashboard'). Measure progress against agreed equine welfare objectives and identify areas of public concern to help guide future FEI initiatives.

The Final Report includes three pages on how to measure and monitor SLO, but it only sets Commitments and Aims for meeting the 5 Domains of Animal Welfare. The 5 Domains are measurable too! That was its original purpose! Why is horse welfare of Member's animals not proposed to be measured?

Animal Care Australia's Horse Members have seen many attempts over the decades by FEI and its NFs to try to improve its public image and to appease members through promises that have not been honoured in good faith. We sincerely believe that this report represents a significant step toward effecting real change within the FEI. However, we remain cautiously optimistic.

Recommendation 20 Establish and promote an equine ethics and wellbeing education programme for all equestrians. Require FEI stakeholders to complete at least two core modules related to equine wellbeing and social licence to operate preferably within their first year of association with the FEI.

The longer trainers, coaches and instructors are involved with horses the less open to new ideas they often are. This is a recognised issue within many equestrian organisations, particularly long running organisations. Animal Care Australia supports Recommendation 20 and 21 - to continue Ongoing Professional Education.

The Final Report does not explain how longer-term instructors, coaches and staff, who haven't evolved in 40 years and continually resist new ideas, science and technologies will be managed. Of greater concerns is whether these individuals will continue to be embraced and protected by the FEI and its NFs?

Again, Animal Care Australia commends the work that has gone into the Equine Ethics & Wellbeing Commission Final Report, and we thank you for the opportunity to provide our feedback on the report.

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

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive, flowing style.

Michael Donnelly
President
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About Animal Care Australia

As a nationally recognised animal welfare organisation, Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

Animal Care Australia was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare.

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- advocating for stronger welfare outcomes
- advocating to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights