

THE COALITION FOR THE PROTECTION OF RACEHORSES Inc.

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13 May 2022

National Horse Traceability Working Group
Stuart McLean - Chair

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Dear Stuart McLean and the NHTWG,

RE: The *National Horse Traceability Register* has lost its way

We write to you as the Coalition for the Protection of Racehorses on behalf of ourselves and a collective of organisations and individuals – many of whom made submissions to the Rural and Regional Affairs and Transport References Committee Inquiry into the Feasibility of a National Horse Traceability Register (NHTR) in early 2019.

The NHTR is now focused solely on biosecurity, leaving horse welfare and rider safety behind. We have come together to call on you to take **urgent** and **immediate** action to ensure the NHTR is redirected back onto its intended course.

As you are no doubt aware, horse welfare, rider safety and biosecurity were the three main reasons given for the need of a NHTR. In September 2020, the Australian Government accepted the Committee's recommendations for a register and stressed welfare and rider safety as the driving reason for its implementation.

The Australian Government agrees that a national horse traceability register could support some biosecurity activities, however, notes that this inquiry and the need for a register was driven by other concerns, including rider safety and horse welfare (Australian Government, 2020, p. 1).

This was then reflected in the Terms of Reference set by Government Ministers for the National Horse Traceability Working Group which was established that same month to "provide advice on matters relating to the design and introduction of a traceability system for horses, donkeys and mules in Australia."

Since this time the Working Group has failed to produce any advice that would lead to an effective register and its focus has been shifted off course towards recommendations for a NHTR that will focus solely on biosecurity. This will do nothing to address horse welfare and rider safety, and, as the most recent communication from the Working Group demonstrates (Communique Six), will do little to reduce biosecurity risks.

The Australian public was devastated and outraged as scenes of extreme and systemic suffering of racehorses caused at knackeries and slaughterhouses played out across the country's television screens in October 2019. The outrage and demand for change was reflected in the subsequent Martin Inquiry commissioned by the Queensland Government:

The racing industry in Australia, in general, has fundamentally failed to intervene at industry level to effectively protect retired racing horses. The public's disapproval is deafening (Martin & Reid, 2020, p. 5).

Importantly, The Martin Inquiry notes that traceability as a welfare option for horses will not work "unless it is expressly designed into the system and its supporting processes" (Martin & Reid, 2020, p. 32), and made the point that "the contents of Biosecurity Queensland's submission support the finding of the Inquiry that the animal welfare program has been overwhelmed by the animal biosecurity program." (Martin & Reid, 2020, p.77). It warned of the potential dangers for animals in allowing a dominance of biosecurity over welfare.

The Thoroughbred Aftercare Welfare Working Group, presented its report in 2021 (TAWWG, 2021), noting "TAWWG is convinced that complete lifetime traceability and a national horse traceability register are fundamental to assuring horse welfare", and that without such a register, "it is almost impossible for the horse industry to demonstrate that horses are being cared for in retirement" (TAWWG, 2021, p. 54). They recommended:

A national horse register and traceability system should be established with utmost priority. The system must allow for all horses to be individually identified and traced to their current owner (TAWWG, 2021, p. 18)

It has been over three years since the NHTR was first proposed to Parliament and almost two years since the Working Group was established. Yet all they have achieved to date is a set of proposed business rules which aim to slightly improve existing Property Identification Codes (PIC's) for the sole purpose of responding to a biosecurity event. In other words, the Working Group has effectively achieved nothing in terms of recommending a NHTS that will achieve its intended purpose.

In response, we have produced a report titled 'The National Horse Traceability Register has lost its way'. It covers the entire process to date, highlighting the original intent of the NHTR, and the steps that have occurred since the Inquiry that have led to its current trajectory.

Our intention is to:

- ensure the public are aware that the Working Group is currently failing to make recommendations based on their own Terms of Reference;
- ensure the Victorian, Queensland and Federal Governments live up to their commitment to the creation of an effective NHTS register and,
- encourage the racing industry to use their strong influence over decision making in high places to guarantee a robust NHTR, especially considering they themselves profess to be in support of such a register

We've seen far too much suffering and have made many positive steps in response to address the issue of horse welfare and rider safety to let this slip away and turn into yet another meaningless government exercise.

Please direct any questions via reply email or phone on 03 9016 3277.

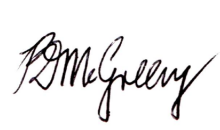
We appreciate your time and look forward to seeing you work towards ensuring Australia finally implements a traceability register the public has demanded and the horses need and deserve.

Regards,



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Co-signatories



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The National Horse Traceability Register has lost its way

Introduction

The purpose of this report is to reiterate the reasons for which the national horse traceability inquiry was initially established and to show that over recent months the general intent has been lost and is now focused on only one reason — biosecurity. In January 2019, Senator Mehreen Faruqi proposed to the Parliament an Inquiry into the Feasibility of a National Horse Traceability Register (NHTR). Whilst there are many benefits of such a register, Senator Faruqi's main objective was improving horse welfare, particularly for racehorses, as well as rider safety, stating that:

By properly tracking horses we can improve safety and biosecurity, and stop racing horses being discarded at knackeries when they're no longer profitable (Hunter Valley News, Ref 1).
<https://www.huntervalleynews.net.au/story/5840391/national-register-a-sensible-policy-senator/>

There is currently no compulsory requirement for horses to be registered in Australia. This lack of oversight can have awful consequences for horses. They are often abandoned in paddocks or dumped at saleyards, and eventually end up in knackeries and slaughterhouses. The benefits of a national register would extend to biosecurity, safety for riders, backyard breeding and rural crime (Facebook, Ref 2).
https://x.facebook.com/283210225077432/photos/a.372637512801369/2069163943148709/?type=3&source=48&_se_imp=0DRDELOThKZFQzwjI

On 12 February 2019, when the Feasibility of a NHTR was referred to the Rural and Regional Affairs and Transport References Committee for inquiry and report, welfare, safety and biosecurity were the three main reasons given. In September 2020, the Australian Government accepted the Committee's recommendations and stressed welfare and safety as the driving reason for the NHTR. This was then reflected in the Terms of Reference set by Government Ministers for the National Horse Traceability Working Group (NHTWG), which was established that same month to "provide advice on matters relating to the design and introduction of a traceability system for horses, donkeys and mules in Australia". However, the Victorian Government later engaged Marsden Jacob to conduct the 'National Horse Traceability Project' report, which was released on 13 January 2022. For this report, references to all needs except biosecurity have been removed. Subsequently, in February 2022, the NHTWG, published a list of 'key elements' needed "to achieve adequate traceability to address **biosecurity challenges**" only. This is inconsistent with some of the eighteen recommendations of the Senate Committee's horse traceability report (2019), the Australian Government's response (2020) and the Terms of Reference set for the Working Group which remain in place. It is also at odds with the Australian public's view of the importance of animal welfare, and their expectations that the problems of horrendous cruelty and abuse in horse industries would be addressed and solved.

It is our view that the working group has chosen to steer the register towards addressing only one of the issues which is biosecurity, while ignoring the several other issues, that we argue are much more important in value for the community and the horses involved. The report that

follows clearly demonstrates the Working Group is failing to meet the terms of reference set for them and how the focus of the traceability register has changed and needs to be redirected to its original purpose.

Chronology of Events - National Horse Traceability Register

January 2019: Introduction of the National Horse Traceability Register Proposal

In January 2019, Senator Mehreen Faruqi proposed an Inquiry into the Feasibility of a National Horse Traceability Register (NHTR). The proposal aimed to provide several benefits that were focused on horse welfare, safety and biosecurity.

12 February 2019: Referral of feasibility terms

Referral of feasibility terms to the Rural and Regional Affairs and Transport References Committee for inquiry and report. As shown below, among other issues, the Committee was also directed to address animal welfare.

*b. the benefits of a national register, including for **animal welfare**, biosecurity safety (including for the prevention and management of Emergency Animal Diseases, such as equine influenza and African Horse Sickness), **backyard breeding and the integrity of trade in horses**;*

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/NationalHorseRegister

17 October 2019: ABC 7.30 Report, The Final Race

The ABC aired its investigation into the cruelty and abuse of horses, focusing on racehorses, at the Meramist Abattoir in Queensland. **From this point, the urgency of addressing animal welfare concerns that was written into the earlier reports on traceability was vindicated.**

November, 2019: The Senate Committee Report

(Rural and Regional Affairs and Transport References Committee: Feasibility of a national horse traceability register for all horses. Commonwealth of Australia).

The Senate report was published in between the ABC television report and the subsequent Martin Inquiry Report, and notes the urgency required to address welfare and traceability:

The investigation brought to light significant problems with the existing system, namely the inhumane treatment of horses in those facilities, and the lack of a traceability system that enables the racing industry to determine the whereabouts of its horses after they leave the industry. Compounding this issue is the lack of accurate data about the number of horses that are processed through Australia's abattoirs and knackerries (Senate, 2019, p. 93).

The report from the Senate Committee (2019) also states that:

The investigation [7.30 report] resulted in renewed calls from across the horse industry, including the racing industry, and animal welfare groups for a national horse traceability register to trace retired racehorses and record the number of horses that are processed through these facilities (Senate, 2019, p. 10).

14 January 2020: Martin Inquiry Report

The Martin Inquiry was a comprehensive 94-page report commissioned by the Queensland Government, tasked specifically to investigate cruelty in the management of retired racehorses at a Queensland abattoir, including horses that had been transported from other states. Among its many findings about the failure of current systems to prevent horrific cruelty and abuse of horses, the inquiry reported:

The Model Code of Practice for the Welfare of Animals: Livestock at Slaughtering Establishments is voluntary and outdated, but most importantly, it fails to provide for appropriate establishment design to achieve humane slaughter of horses (Martin & Reid, 2020, p. 20).

Poor design of slaughter establishments, inappropriate handling of horses such as using loud noises to move horses, allowing horses to see and hear other horses being stunned or shot and smell blood immediately before slaughter, are all factors that lead to poor welfare outcomes for horses and are not prevented under current legislation (Martin & Reid, 2020, p. 20).

The racing industry in Australia, in general, has fundamentally failed to intervene at industry level to effectively protect retired racing horses. The public's disapproval is deafening (Martin & Reid, 2020, p. 5).

Whether one acts through moral obligation or a realisation that if the industry loses public support, there will be no industry to support one's livelihood, action must be taken immediately (Martin & Reid, 2020, p. 5).

September 2020: Australian Government response to the Senate Committee Report

Australian Government (September, 2020). *Australian Government response to the Senate Rural and Regional Affairs and Transport References Committee Inquiry report: Feasibility of a national horse traceability register for all horses.*

<https://www.awe.gov.au/about/reporting/obligations/government-responses/feasibility-national-horse-traceability-register>

The committee made eighteen recommendations to the Australian Government. who responded to the recommendations made by the committee in their report. It is worth noting that the recommendations all support the idea of a register that will benefit all horses and importantly *include* all horses.

However, Recommendation 3 introduces a different perspective on the purpose of the NHTR

Recommendation 3

*5.25 The committee recommends that the national horse traceability working group works towards establishing a national horse traceability register that, **at its core, serves a biosecurity function** (Senate, 2019).*

The Australian Government response to this recommendation was to reiterate the initial reasons for which the traceability system was made, that is, the traceability system should not be solely focused on biosecurity reinforcing the Martin Inquiry comment about the lack of welfare concern in the Biosecurity Act.

*The Australian Government agrees that a national horse traceability register could support some biosecurity activities, **however, notes that this inquiry and the need for a register was driven by other concerns, including rider safety and horse welfare** (Australian Government, 2020, p. 1).*

The report recognises there are a range of potential drivers across the various horse industry sectors, such as rider safety, horse welfare and biosecurity, for an ongoing national traceability register and there would be a significant cost to the public associated with establishing a register. Previous attempts by states and territories to establish systems which would assist in horse traceability have been abandoned because of the prohibitive cost involved (Australian Government, 2020, p. 1).

*The Australian Government agrees in part with this recommendation. The Australian Government agrees that a national horse traceability register could support some biosecurity activities, such as if there was a disease outbreak, **but notes that this register was also proposed for rider safety and animal welfare reasons. There are currently no animal traceability requirements in the Biosecurity Act 2015** (C'th) (Australian Government, 2020, p. 3).*

September 2020: Terms of Reference for the NHTWG (Agriculture Victoria)

Once again, in 2020 the Terms of Reference for the NHTWG specifically addressed biosecurity and welfare, as well as acknowledging the need to consider broader stakeholders.

<https://agriculture.vic.gov.au/livestock-and-animals/horses/horse-traceability/terms-of-reference>

*3.3.2 The Terms of Reference of the NHTWG are to: a) Consider and make recommendations on the design, introduction, operation, legal framework and enforcement of a traceability system, addressing biosecurity, **welfare** and broader horse industry and stakeholder needs (Agriculture Victoria, 2020).*

The importance of welfare was again stated on 5 October 2020 in a Victorian Government Media release, in which the Victorian Minister for Agriculture, Jaclyn Symes, was quoted:

<https://www.premier.vic.gov.au/work-national-horse-traceability-system-underway>

*Creating a national horse register is an important step in improving biosecurity arrangements for all horses, and will give peace of mind to industry that the health **and welfare** of their animals is protected.*

In the seventeen months since the Working Group first met on 30 October 2020, six of the eight original members have resigned. The reasons for this high level of turnover of the working group membership are unknown, but the lack of progress in the seventeen months since the working group was formed, and the long gaps between Communiques, indicate there are significant issues in the functioning of the Working Group.

Changes to members of the National Horse Traceability Working Group – initial to current

- Animal Health Australia – representative resigned and has been replaced
- Horse Industry Council – two representatives resigned and have been replaced
- Racing Australia – remains
- Harness Racing Australia – representative resigned and has been replaced
- Royal Society for the Prevention of Cruelty to Animals – representative resigned and has been replaced
- Equestrian Australia – representative resigned and has been replaced
- Stuart McLean, Australian Livestock Saleyards Association – President, remains as chair
- Representatives from state and territory governments as well as the Commonwealth

January 2020: Thoroughbred Aftercare Welfare Working Group (TAWWG)

In response to the 7:30 Report, this group formed in January 2020, comprised of racing and breeding representatives, who commissioned their own investigation through the Thoroughbred Aftercare Welfare Working Group, which presented its report in 2021 (TAWWG, 2021). The report notes that “TAWWG is convinced that complete lifetime traceability and a national horse traceability register are fundamental to assuring horse welfare”, and that without such a register, “it is almost impossible for the horse industry to demonstrate that horses are being cared for in retirement” (TAWWG, 2021, p. 54).

The TAWWG made 41 recommendations, of which the following are particularly relevant for traceability:

14. A national horse register and traceability system should be established with utmost priority. The system must allow for all horses to be individually identified and traced to their current owner (TAWWG, 2021, p. 18)

17. Racing Australia should encourage the national traceability of thoroughbreds for life by developing the capacity to update ownership and other details at any stage of career and life and providing incentives for owners to do so (TAWWG, 2021, p. 18),

46. TWA should establish a publicly available national thoroughbred welfare information portal that is regularly updated with key data to ensure the public is fully informed with accurate information on the welfare of thoroughbred horses in Australia (TAWWG, 2021, p. 18).

13 January, 2022: Marsden Jacob Report

Even though a Working Group was already established, with their Terms of Reference set, the Victorian Government commissioned Marsden Jacob to conduct the ‘National Horse Traceability Project’ report. Its sole focus, set by Agriculture Victoria, is biosecurity. Despite the initial proposal, the horrific findings of the Martin Inquiry, the Senate Committee report and Australian Government agreement, the findings of the Thoroughbred Aftercare Welfare Working Group and the will of the Australian public with respect to the care of horses, the Terms of Reference provided to the consultants by Agriculture Victoria make no reference to welfare, as below.

The Terms of Reference for this project require us to focus on the role of a horse traceability system in the context of biosecurity (Marsden Jacob, 2022, p. 10).

This flawed and limited objective resulted in the report recommending a system that traces horses in the same way animals used mostly for food are traced, (which horses primarily are not). Improvements to Property Identification Codes (PIC’s) as the recommended key finding leaves horses with a system that does nothing to meet the objectives of the NHTR.

The commissioning of this report strongly suggests that Agriculture Victoria intended to restrict the working group’s approach to a traceability register to one focused on biosecurity.

14 February 2022: Communique Five, Agriculture Victoria

<https://agriculture.vic.gov.au/livestock-and-animals/horses/horse-traceability>

This communication from Agriculture Victoria in early 2022, further signifies the sudden and dramatic change in the focus of implementing a National Horse Traceability Register, to one that is focused solely on biosecurity. *Communique Five*, issued on 14 February, 2022 states:

*The Working Group agreed that **to achieve adequate traceability to address biosecurity challenges**, the system should include the following key elements ...*

The eight key elements (most of which are already in place) do nothing to address horse welfare and rider safety, as the register intended.

This is further clarified in Communique Five which also states what the working groups key elements will achieve.:

Following a biosecurity incident, the expected outcome associated with the implementation and operation of the system described in the business rules is to enable:

- *horses of interest to be traceable within 24 hours back to properties (PICs) on which they have resided or visited (traceback), and*
- *horses co-residing with or that have been in contact with horses of interest to be located within 24 hours (contact tracing).*

It is worth noting that the Martin Inquiry “support the finding of the Inquiry that the animal welfare program has been overwhelmed by the animal biosecurity program” (Martin & Reid, 2020, p.77), and it warned of the potential dangers for animals in allowing a dominance of biosecurity over welfare:

Biosecurity Inspectors who work within the animal biosecurity and welfare program have a dual role, which can create a conflict or a perceived conflict of interest between the welfare of animals and the interests of persons whose livelihoods are dependent on animals (Martin & Reid, 2020 p.78).

Figure 1 below illustrates the relative focus on welfare and biosecurity in the major reports about horse welfare and traceability. Unsurprisingly, the Martin report, which was specifically tasked to investigate cruelty and abuse of racehorses, has the highest mentions about welfare. It is also clear that although the Senate Committee (2019) acknowledged a higher focus on biosecurity, it was almost equally focused on welfare. The Government response to the Senate Committee Report, being mindful of the ABC Meramist investigation and the subsequent Martin inquiry, noted there should be an equal focus on both welfare and biosecurity. However, the recent Marsden Jacob (2022) report, barely considers welfare, and its Terms of Reference focused only on biosecurity.

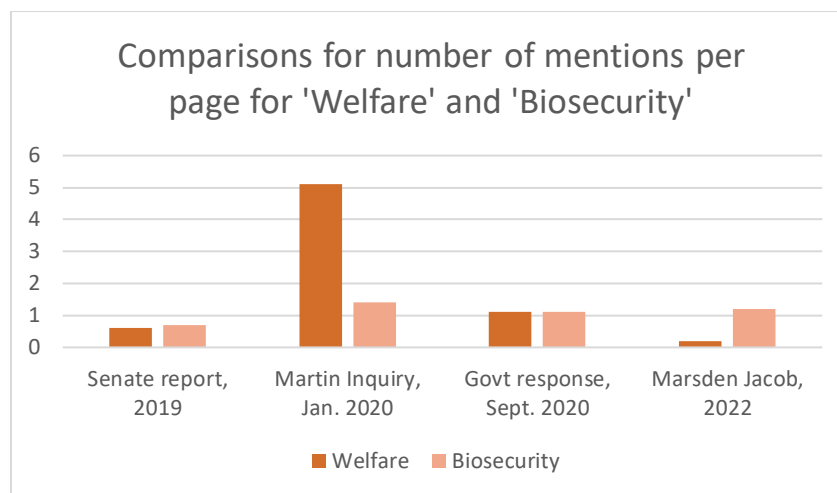


Figure 1: Importance of welfare and biosecurity in reports

It is also worth noting that Communiques three, four and five demonstrate that there was no progress reported by the Working Group between July 2021 and February 2022. We suspect this is due to dysfunction of the Working Group and an incapacity to agree on the content of a communique.

The Australian public's concern for the welfare of horses

The terms of reference provided to Marsden Jacob completely ignores the importance of horse welfare and rider safety to the Australian community. This approach is inconsistent with the findings of the Senate Committee (2019) report, which states that:

The majority of submissions and witnesses to the inquiry indicated support for a national horse traceability system in Australia. This support was conveyed across various stakeholders that make up the horse industry, including the racing industry, breed societies, veterinarian representatives, horse owners, police, agricultural and farmers' bodies, and the DPI (Senate, 2019, p. 10).

Figure 2, below, provides a summary of the main views expressed in the submissions made to the initial Inquiry. Of course, there were many other good reasons widely supported by the submissions made to the committee by many interest groups. The groups were from a variety of different backgrounds - from the racing industry to breeders, animal protection organisations and individuals. It is clear that while biosecurity is definitely an important reason for supporting the NHTR, animal welfare was the most mentioned reason for supporting such a scheme. Other related reasons such as birth to death traceability and discouraging back yard breeding were also frequently mentioned.

It is also important to note that nearly all public submissions to the Senate Inquiry supported the idea of the NHTR as being one **that needed to include all equines. As the name suggests, a National Horse Traceability Register is for all horses.**

There were seventy submissions to the Senate Inquiry. However, we could access only fifty-nine, of which six did not indicate a preference. Figure 2 shows 98% of witnesses supported full registration of all horses, with welfare supported by 75.5%, and biosecurity by 62.3%. The figure also shows that many other reasons are important to the community with respect to horse traceability.

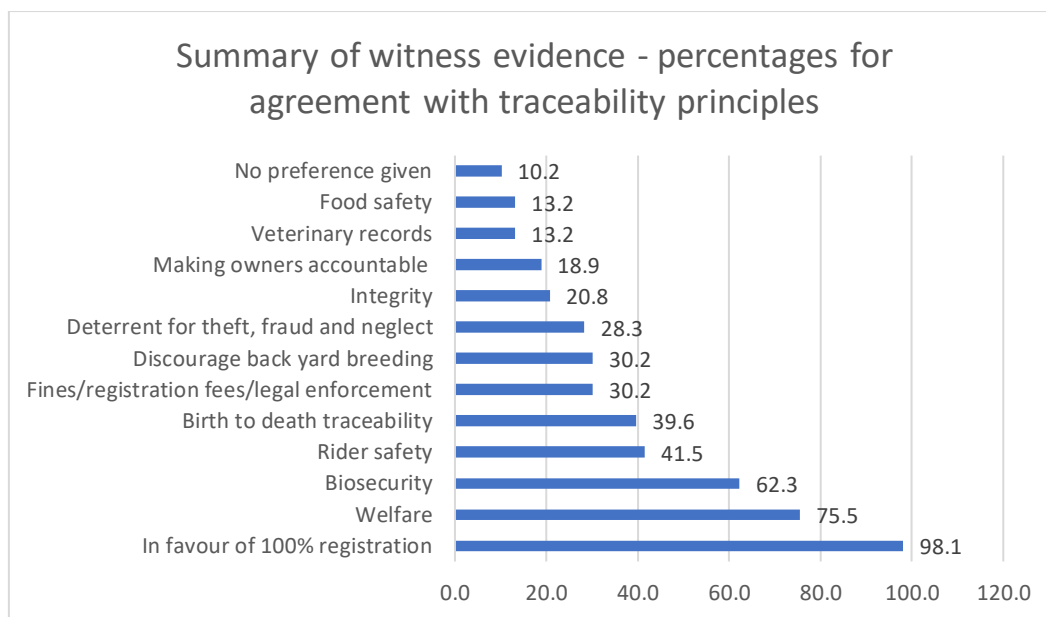


Figure 2: Summary of witness evidence preferences

The Senate Committee report referred to the ABC 7.30 investigations, noting that “The footage, which shocked the nation, reignited calls for improved horse welfare outcomes and a national horse traceability register to strengthen accountability” (Senate, 2019, p. 39).

The Martin Inquiry acknowledges the public’s concern for the welfare of horses used in the racing industry, stating that:

The public rightly expects the problem to be addressed immediately. There is no reason why the problem cannot be ameliorated immediately. There is no need to wait to do what is right (Martin & Reid, 2020, p.5).

Why a biosecurity focused traceability system does not address horse welfare

While we agree that the concerns of biosecurity overlap with those of welfare, it would be erroneous to assume that a traceability system that is exclusively focused on biosecurity, such as that being promoted in the Marsden Jacob report, and subsequently recommended by the Working Group, will automatically provide adequate welfare for horses. The conflicts of interest that can occur within a biosecurity dominated system, between animal welfare and economic concerns, has already played out on national television. Welfare must be an integral design component of the traceability system: whole of life traceability through individual identification of all horses across the nation, providing accountability to the public is essential.

The Marsden Jacob report, however, seems to argue against the need for whole of life traceability on the basis that it exceeds biosecurity requirements – and is therefore more costly than it needs to be. This fails to consider that a horse’s welfare can be seriously compromised at all stages of his or her life —that being for racehorses in breeding, transport, racing and training, and retirement. Thus, a traceability system that applies only during unpredictable and infrequent periods is pointless. Rider safety and horse management also require a whole of life historical record that is easily accessible.

The suggestion in the report that the traceability system would be activated only in the instance of a biosecurity incident runs counter to horses’ ongoing, and life-long welfare needs. Horses, particularly those in and retired from the racing industry, are regularly engaged in activities

that present welfare threats – their welfare cannot be assured, if the system is activated only in the event of a biosecurity threat.

As CPR has stated in its submission to parliament, for the NHTR to be successful and achieve its objectives, it will require several key elements.

Whole of life traceability

For all the reasons put forward in the fifty-nine accessible submissions made to why we should have a National Horse Traceability Register, whole of life traceability of all horses is the most important criterion that must be met. Even if biosecurity was the main reason for the NHTR, outbreaks could not be managed effectively without knowing who and where horses are at any one time.

This will require:

- Registration of every horse from birth
- Microchipping
- Transfer of ownership
- Transfer of PIC location
- Death notification

Additional information including:

- activities the horse is engaged in
- injuries sustained
- veterinary treatment records
- horse temperament
- cause and location of death

will also be necessary to provide optimal horse welfare and rider safety outcomes.

Independent Statutory body

For integrity, the register needs to be managed independently and by government.

Integration of Existing databases

There is no need for replication of existing databases. Existing databases can be integrated into the National Data Base with additional information required by the NHTR added as needed. Information required only by the individual database can remain private and only accessed by authorised persons.

Compliance

For the NHTR to be effective, compliance is essential. Therefore, CPR recommends sufficient penalties must apply to deter non-compliance and increase with every successive breach of the regulations.

Funding and Registration

Dogs and cats are registered for a fee in every state and territory of Australia. Horses should also be registered. This would create a revenue stream for the NHTR. Existing horses could perhaps be exempt for a period of three years before the fee is payable.

Horses can cost many thousands of dollars per year. For anyone who says that they couldn't afford a nominal fee of perhaps \$80 per year, should not own horses. This would have the benefit of being a deterrent for those who don't have the financial means to properly care for a horse as well as reduce unnecessary breeding. Horse breeders should also be made to contribute by means of a foal levy. Registered horse rescue organisations should be exempt from this fee.

Horse welfare and the racing industry

We wish to also point out that the Martin Inquiry and the Senate Committee both advocated for planning of welfare as an integral part of traceability. The statements below from the Senate Inquiry (2019) also specify how the lack of traceability and transparency have affected horses and calls for action from the racing industry.

*Both the public's confidence in the racing industry, and its social licence to operate were called into question with the alleged horse treatment and welfare concerns revealed by the ABC's '7:30' investigation into the racing industry. Footage provided to the investigation showed the mistreatment of horses at a Queensland abattoir, who were subjected to beatings and electrocutions, and in clear distress at the time of their death. **The footage, which shocked the nation, reignited calls for improved horse welfare outcomes and a national horse traceability register to strengthen accountability.***

*The evidence submitted to this inquiry revealed the significant impact a lack of traceability has had concerning the killing of horses at Australia's abattoirs and knackeries. There is no data available to determine how many horses are killed at these facilities each year, which has meant that **any associated welfare issues are also hidden from public view.***

For this reason, the committee calls upon the racing industry to work alongside government to ensure a national horse traceability register complements and bolsters its efforts to track retired horses and to ensure its horses live healthy, happy and long lives.

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/NationalHorseRegister46/Report/section?id=committees%2freportsen%2f024292%2f72360

Conclusion

The National Horse Traceability Working Group was tasked to provide advice on matters relating to the design and introduction of a traceability system for horses, donkeys and mules in Australia. Their advice, expressed in Communique Five, has made it clear that the original objectives of the NHTR have been lost.

The group was established with eight non-government members (including the chair). Six have since resigned and been replaced. Of the eight current members, six have a direct interest in horse related industries.

Agriculture Victoria is one of the government representatives in the Working Group and also acts as the Secretariat. Their deliberate framing of the Marsden Jacob report to focus solely on biosecurity suggests that they have actively gone out of their way to encourage the development of a system that does not also address rider safety and horse welfare. This has no doubt influenced the Working Group in its failure to make recommendations for a system that will meet all of the NHTR objectives.

The Australian racing industry has a lot of influence over decision making in high places. Whilst the Senate Inquiry called upon them to work alongside the Australian Government to ensure an effective NHTR, and the racing industry itself professes to be in support of such a register, we would hope that they act swiftly in asserting their influence at this crucial time to steer the current trajectory of the NHTR back on course. With ever increasing public pressure and their social license to operate at stake, an effective NHTR that allows the horse racing industry to pursue greater welfare outcomes is in their own best interests.

The Martin Inquiry notes that traceability as a welfare option for horses will not work “*unless it is expressly designed into the system and its supporting processes*” (Martin & Reid, 2020, p. 32). It also states that given the high mobility of horses and stabling arrangements, “traceability can only be effectively addressed at a national level” (Martin & Reid, 2020, p. 33). In other words, welfare must be part of the planning from the outset, and not just added at some later stage.

This Marsden Jacob report and the path the Working Group has set, demonstrates how the initial principal reasons for having a National Horse Traceability Register have been set aside, to allow for a sole focus on biosecurity. Whilst this is an extremely important reason, there are many others. Importantly, the most important reason, horse welfare has been excluded.

Recommendations

For the many reasons stated above, we strongly recommend that the Working Group disregard the recommendations of the Marsden Jacob Report, whose objectives do not align with those of the NHTR. If the existing working group members cannot make recommendations which aim to achieve the objectives of the NHTR and the Terms of Reference set for them, then a new working group must be established made up of members whose primary focus and knowledge is in equine welfare, biosecurity and rider safety without conflicts of interest. This includes without influence from Agriculture Victoria. Only then will the objectives of the NHTR be met.

References

Senator Faruqi quotes

1. <https://www.huntermvalleynews.net.au/story/5840391/national-register-a-sensible-policy-senator/>

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12 February 2019: Referral of feasibility ideas to the Rural and Regional Affairs and Transport References Committee

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Erica Martin Email: emartin@hsi.org.au Sent: 13 May 2022 00:43:42 UTC Viewed: 13 May 2022 00:52:36 UTC Signed: 13 May 2022 00:52:53 UTC		 IP address: 49.3.105.237 Location: Sydney, Australia
Chay Neal Email: chay@alq.org.au Sent: 13 May 2022 00:43:42 UTC Viewed: 13 May 2022 01:19:05 UTC Signed: 13 May 2022 01:36:24 UTC		 IP address: 58.6.236.122 Location: Sunshine Coast, Australia
Paul McGreevy Email: pmcgree2@une.edu.au Sent: 13 May 2022 00:43:42 UTC Viewed: 13 May 2022 00:44:28 UTC Signed: 13 May 2022 02:42:14 UTC		 IP address: 73.14.60.171 Location: Fort Collins, United States
Deb Barber Email: aeusgroup011@gmail.com Sent: 13 May 2022 00:43:42 UTC Viewed: 13 May 2022 02:55:01 UTC Signed: 13 May 2022 02:57:37 UTC		 IP address: 112.213.218.31 Location: Sydney, Australia

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Juliana Waugh Email: julianaw@bigpond.net.au Sent: 13 May 2022 00:43:42 UTC Viewed: 13 May 2022 04:02:04 UTC Signed: 13 May 2022 04:02:32 UTC		 IP address: 115.42.2.234 Location: Marsden Park, Australia
Janine Clipstone Email: kimjanlk@chariot.net.au Sent: 13 May 2022 00:43:42 UTC Viewed: 13 May 2022 04:35:31 UTC Signed: 13 May 2022 04:36:37 UTC		 IP address: 60.240.254.184 Location: Adelaide, Australia
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Elio Celotto Email: elioc@horseracingkills.com Shared via link Sent: 13 May 2022 00:43:42 UTC Viewed: 15 May 2022 23:57:40 UTC Signed: 15 May 2022 23:59:04 UTC		 IP address: 14.203.90.140 Location: Melbourne, Australia

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