

Standards and Guidelines for the Health and Welfare of Horses in Western Australia Consultation - submission questions responses

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Q #	Question	Response	
6 & 7	<p>Please indicate to what extent you agree/disagree with the following statement: People who own or keep horses in WA should have to comply with minimum standards for the health and welfare of horses</p>	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree • Unsure • I haven't read the WA Horse Standards and Guidelines 	<p>Please provide the main reasons for your answer to this question</p> <p>By complying with the minimum standards, the health and welfare of horses in WA is likely to be maintained.</p>
8 & 9	<p>Please indicate to what extent you agree/disagree with the following statement: The proposed minimum standards in the document are appropriate to safeguard the health and welfare of horses in WA</p>	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree • Unsure • I haven't read the WA Horse Standards and Guidelines 	<p>Please provide the main reasons for your answer to this question</p> <p>The standards are measured and reasonable with the consideration of comments provided in the responses provided</p>

10 & 11	<p>Please indicate to what extent you agree/disagree with the following statement: The proposed minimum standards reflect community values and expectations for the acceptable treatment of horses in WA</p>	<ul style="list-style-type: none"> ● Agree ● Mostly agree ● Neither agree nor disagree ● Mostly disagree ● Disagree ● Unsure ● I haven't read the WA Horse Standards and Guidelines 	<p>Please provide the main reasons for your answer to this question</p> <p>The standards are measured and reasonable with the consideration of comments provided in the responses provided</p>
12 & 13	<p>Please indicate to what extent you agree/disagree with the following statement: The recommended guidelines are appropriate to further educate and reflect community values and expectations for the acceptable treatment of horses</p>	<ul style="list-style-type: none"> ● Agree ● Mostly agree ● Neither agree nor disagree ● Mostly disagree ● Disagree ● Unsure ● I haven't read the WA Horse Standards and Guidelines 	<p>Please provide the main reasons for your answer to this question</p> <p>The standards are measured and reasonable with the consideration of comments provided in the responses provided</p>
14 & 15	<p>Please indicate to what extent you agree/disagree with the following statement: In general, I support the proposed minimum standards.</p>	<ul style="list-style-type: none"> ● Agree ● Mostly agree ● Neither agree nor disagree ● Mostly disagree ● Disagree ● Unsure ● I haven't read the WA Horse Standards and Guidelines 	<p>Please provide the main reasons for your answer to this question</p> <p>The standards are measured and reasonable with the consideration of comments provided in the responses provided</p>

16 & 17	<p>Please indicate to what extent you agree/disagree with the following statement: The key issues have been adequately addressed in the Standards and Guidelines</p>	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree • Unsure • I haven't read the WA Horse Standards and Guidelines 	<p>If you disagreed with Question 16, please specify which issues have not been addressed and suggest alternative options</p>
18 & 19	<p>Will complying with these minimum standards require you (or members of your organisation) to change how you/they operate?</p>	<ul style="list-style-type: none"> • Yes • No • Unsure • I haven't read the Standards and Guidelines 	<p>If you answered Yes to Q18, please provide details of which standards will require changes to how you operate and describe the changes</p> <p>The requirement to change the minimum box or stable size will have a capital expense impact on veterinary businesses. It may also have an impact on health and welfare of patients in veterinary facility care.</p> <p>The veterinarian is best placed to determine what size box or stable will provide the optimal management for the health and wellbeing of the patient in that housing.</p> <p>Boxes or stables in a veterinary setting must be managed differently to those used in residential horse facilities and should be provided exemption to the minimum box or stable size regulation. This is due to:</p> <p>Horses are not housed long-term in veterinary facilities</p> <p>Horses can require to be restricted with their movement during treatment, recovery or rehabilitation under veterinary care and direction.</p>
20 & 21	<p>Will complying with the minimum standards have an impact on the costs of horse ownership or horse business operations?</p>	<ul style="list-style-type: none"> • Yes • No • Unsure • I haven't read the Standards and Guidelines 	<p>Please provide the main reasons for your answer to Q 20, including any estimated costs of compliance</p>

			Constructing new or altering existing boxes or stalls to meet larger minimum requirements in a veterinary hospital would increase capital costs approximately \$1500 -2000 per box or stall
22 & 23	<p>Please indicate to what extent you agree/disagree with the following statement:</p> <p>Complying with the standards will have a similar impact on small business compared to medium and large business</p>	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree • Unsure • I haven't read the WA Horse Standards and Guidelines 	<p>Please provide the main reasons for your answer to Q22, including whether you think complying with the standards will have a greater impact on small, medium or large businesses</p> <p>Capital expense and overheads impact smaller/medium business greater than larger ones, with these businesses less able to absorb the increased expenses this regulation change would require.</p> <p>The majority of veterinary businesses are small/medium enterprises</p>
24	<p>Below are a number of statements regarding horse care and management intended to be implemented under the minimum standards. Please indicate to what extent you agree or disagree with each statement</p>	<p>Tethering must not be used as a permanent means of housing a horse.</p>	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree
		<p>A horse must not be ear twitched with a rope or other device</p>	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree
		<p>A horse must not be hobbled for a continuous period of more than 12</p>	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree

		hours in any 24-hour period	<ul style="list-style-type: none"> • Mostly disagree • Disagree
		A horse must not be stabled without bedding for longer than 12 hours at a time	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree
		A horse must not be bred with a parent or sibling.	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree
		Spurs must not be used in a manner that causes abrasions on the horse's skin or to cause fear, pain or to punish the horse.	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree
		Whips or training sticks must not be used in a manner to cause fear, pain or to punish the horse	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree

		A horse's airways or breathing must not be restricted by the use of tack or equipment.	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree
		A procedure that is undertaken for the purpose of enhancing or reducing performance for a competitive event that has a negative effect on the horse's health, safety or welfare must not be used.	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree
		Event organisers must provide adequate facilities and equipment to cool horses if events are conducted during hot and/or humid weather.	<ul style="list-style-type: none"> • Agree • Mostly agree • Neither agree nor disagree • Mostly disagree • Disagree
25	If you disagree with any of the statements in Question 24, please indicate why.	Statement: Tethering must not be used as a permanent means of housing a horse.	<p>Tethering horses is a well-accepted technique for reducing the chance of exacerbating or aggravating serious pelvic and hindlimb fractures and can be utilised under appropriate veterinary direction as a salvage procedure as an alternative to euthanasia.</p> <p>Tethering for 6 weeks or more may be required, and should be permissible under veterinary direction.</p>

			Also see Q33 response
		Statement: Whips or training sticks must not be used in a manner to cause fear, pain or to punish the horse	This statement is incongruous with whip use for racing in WA. There would be requirement for a law change in WA racing if this was a minimum standard in the WA Horse Standards and Guidelines.
		Statement: A horse must not be ear twitched with a rope or other device	Ear twitching, if applied correctly and for brief periods aids in restraint and makes handling horses safer - particularly in foals. For the safety of veterinarians and the welfare of the horses under their care, veterinarians should be permitted to ear twitch in accordance with their professional judgement.
26 & 27	In your view, what is an acceptable minimum stable size (in m2) for an average 500kg horse?	255 character response allocated for this answer 9 - 12 m2 – depending on their use in a veterinary setting	Please provide reasons for your answer to Question 26 The veterinarian is best placed to determine what size box or stable will provide the best management for the health and wellbeing of the patient in that housing. Boxes or stables in a veterinary setting must be managed differently to those used in residential horse facilities and should be provided exemption to the minimum box or stable size regulation. This is due to: Horses are not housed long-term in veterinary facilities Horses can require to be restricted with their movement during treatment, recovery or rehabilitation under veterinary care and direction.
28	The minimum standards require that a person does not breed a horse that is known, or could be reasonably suspected, to have a heritable disorder, unless under the advice of a	<ul style="list-style-type: none"> • Yes • No • Unsure 	

	<p>veterinary or relevant geneticist. A heritable disorder is defined as ‘a health condition of the horse that is heritable and, if inherited by the progeny of the horse, may adversely affect the progeny’s welfare’</p> <p>From the definition above, are you confident that you know what a ‘heritable disorder’ is?</p>		
29	Do you think a horse with a heritable disorder should be intentionally bred?	<ul style="list-style-type: none"> • Yes • No • Unsure <input checked="" type="checkbox"/> It depends on the circumstances 	
30 & 31	Do you think the standard relating to heritable disorders is reasonable?	<ul style="list-style-type: none"> • Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unsure 	<p>Please provide the main reasons for your answers to Questions 28-30.</p> <ul style="list-style-type: none"> • The definition is unclear as we believe it would require to be defined for each disorder, which may be challenging eg we know that RLN (roaring) and OCD conditions are heritable in some degree and they do affect a horses welfare but there are surgical solutions to the diseases they cause. • The wording “reasonably suspected” is open for interpretation. <input type="checkbox"/> The circumstances may include – degree of abnormality, heritability index, degree of welfare issues caused ie a small non reducible umbilical hernia may be of no consequence
32	Do you support the Horse Standards and Guidelines being adopted as a code of practice under the Animal Welfare (General) Regulations 2003? Adopted codes of practice must be used by the courts to assess husbandry and management practices in cases of	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Yes • No • Unsure 	<p>1) With consideration being given to the responses provided in this submission</p>

	alleged cruelty, and can be used as a defence to a charge of cruelty?		
33	The questions in this survey have been designed to address the key issues likely to draw comment in the Standards and Guidelines. The document includes 96 standards in total so if you have any other comments or concerns about the Horse Standards and Guidelines that have not been addressed, please note them here.		
2		Interpretation Pge 7	<i>veterinary advice means advice of a veterinarian, including telephone advice;</i> This should encompass all forms of digital communication modalities beyond the telephone
3		Part 2 – General care of horses Section 1 – General 1. Identification Pge 8	<i>Note:</i> <i>Microchips must be implanted in accordance with the requirements in the Veterinary Practice Act 2021.</i> The AVA policy Electronic identification of animals states that; the implanter should preferably be a veterinarian, because of the knowledge of aseptic technique, anatomy and pain relief required. The accountability of registered veterinarians fosters accuracy, confidentiality and expertise in record keeping. If state legislation permits implantation by non-veterinarians, this should only be permitted after a suitable training course and under the supervision of a registered veterinarian. <i>If a horse is to be branded, freeze-branding is preferred for animal welfare reasons.</i> The AVA policy Branding of horses states that where branding is considered necessary then freeze branding must be used and appropriate analgesia is essential. The AVA requests the above be included in this Standard.
4		2. Supervision G2.1 Pge 9	<i>A person supervising a horse should be capable of recognising signs of abnormality and have access to veterinary advice in a timely manner.</i>

			<p>The AVA requests this be made a Standard rather than a Guideline. It is vitally important that any person deemed to be responsible for the supervision of a horse, and therefore its welfare, <u>must</u> be capable of recognising signs of abnormality.</p>
4	<p>Section 3 – Health and management 6. Health and veterinary care G6.1 Pge 15</p>	<p><i>An aged horse should receive a health-check by a veterinarian or a person experienced in the care of horses</i></p> <p>A definition of "experienced" is required.</p> <p>The AVA requests that this Guideline requires health-checks should be carried out by veterinarians only.</p>	
5	<p>G6.11 Pge 16</p>	<p><i>Nasogastric tubing should be performed by a veterinarian or under veterinary supervision.</i></p> <p>The AVA policy Restricted acts of veterinary science includes nasogastric tubing of horses as a procedure which should only be performed by registered veterinarians.</p> <p>The AVA position is that a formal degree in veterinary science, registrable within Australia, is the minimum acceptable knowledge base and skill set necessary to perform acts of veterinary science competently. This minimum standard is in place to protect animals and the community and is supported by the majority of Australian state and territory veterinary practitioner boards. The veterinarian is uniquely qualified to make evidence-based diagnoses, to manage patients before, during and after procedures, and to understand the systemic impacts of medical or surgical interventions on the individual patient. This level of knowledge and expertise is essential in order to minimize adverse welfare consequences and yield successful outcomes for the patient.</p>	
6	<p>Note Page 17</p>	<p><i>In addition to physical health, consideration ought to be given to the horse's mental wellbeing.</i></p> <p>The term "ought to" is not modern language and not defined.</p> <p>To provide appropriate importance to the mental wellbeing of horses, the AVA requests that this wording be changed to "should" or consider using "must" to increase to a Standard.</p>	

7	11. Dental care S11.1 Pge 24	where required under the Veterinary Practice Act 2021, a veterinarian or <i>A person must not perform equine dental procedures on a horse unless they are:</i> <i>(a) competent to perform the procedure; and</i> <i>(b) where required under the Veterinary Practice Act 2021, a veterinarian or authorised person</i> The AVA Policy Equine dentistry states that all dental procedures on horses should be performed only by registered veterinarians and request that this be used in these Standards.
8	13. Restraint S13.6 Pge 26	<i>A person must not restrain a horse in a manner that causes its head to be held above the level of the withers for a period that poses a risk to the welfare of the horse, unless for a veterinary procedure.</i> The term "period" requires to be better defined.
9	Note Pge 26	<i>Ear twitching is discouraged as it is inherently painful, whether by hand or with a device, and can cause horses to become head shy</i> This statement is inconsistent with Standard S13.3: <i>A person must not ear twitch a horse with a rope or other device.</i>
10	22. Competition and events Note – performance enhancing procedures Pge 42	<i>These procedures can have detrimental effects on the welfare of the horse, and should never be performed. If they are detected in competition, disqualification should occur as a result.</i> The AVA requests that for the best welfare of horses used in competition and events that this is a Standard not a Guideline.
11	22. Competition and events S22.3	The AVA believes that the language used in this Standard requires clarification and/or modernisation. <i>A person must not perform a procedure that poses a risk to the welfare of the horse for the purpose of enhancing or reducing performance for a competitive event.</i> The wording should relate to the specific sport rules.

	Notes pge 42	<p>Performance enhancing procedures A range of procedures have been used historically to attempt to improve or modify a horse's performance in competition. Such procedures can include:</p> <ul style="list-style-type: none"> • doping a horse with performance-enhancing substances; • applying sensitising or desensitising agents (tail blocking, nicking, botox injections, gingering tails etc.); • hypersensitising or desensitising limbs; • 'rapping' or other methods intended to induce a horse to jump higher or more carefully by inducing fear, pain or injury; • using electric shock devices; • exhausting a horse through the use of sleep deprivation or excessive exercise; • causing fatigue of the horse's neck muscles by tying the horse's head excessively high for extended periods; • blood-letting or blood-doping; and • using aids such as tail weights. <p>The terms "doping" and "performance enhancing" are no longer commonly used. Language used should be relating to banned and controlled medications.</p> <p>The words "exhausting" and "excessive" require further definition as they are subjective terms depending on the fitness, breeding, age etc of individual horses.</p> <p>The AVA recommends that guidelines used for this Standard should be adopted from, or refer to, those of FEI Cleansport</p>
12	S23. Riding schools and horse hire establishments Note Pge 43	<p>.....taking into account the age, size, experience, riding ability and any known handicap or limitation of the rider.</p> <p>Review of the use of the word "handicap" as appropriate language is recommended.</p>
13	Appendix 2: Ill health First aid kit Pge 46	<p>The list of First Aid Kit emergency contacts should include veterinary services contact details including details of after-hours veterinary services.</p>

	Appendix 6: Exercising horses in hot weather Preventing heat stress in horses Pge 52	<p><i>As a general rule, once the WBGT Index reaches 30, precautions will need to be implemented to reduce the heat load on horses and prevent poor welfare outcomes. The precautions will depend on the circumstance, and may include avoiding exercise at all, or at least minimising its frequency, duration and intensity. It may be necessary to alter the time or location of the exercise, to the coolest part of the day, and/or to grassed riding surfaces or shaded areas. Other precautions may include providing regular rest breaks, access to shade and water and active cooling after exercise.</i></p> <p>The AVA policy Heat stress in the horse contains recommendations around WBGT readings which includes when event cancellation should be considered.</p> <p>We request that this be included in Appendix 6: <i>Typically, no changes are recommended for WBGT readings less than 28, some precautions at 28-30, additional precautions at 30-32, 32-33 is hazardous and over 33 cancellation of all competitions is recommended.</i></p>
14	Electric devices Pge 53	<p><i>Currently, there is an exception for using an electric stock prod on a horse at a rodeo, under certain circumstances.</i></p> <p>The AVA supports the Rodeos in Victoria position on the use of electric prodders on horses, which states that electric prodders must not be used on horses at any time.</p> <p>The AVA request that this be adopted and no exception for use of electric stock prods on a horse at a rodeo be allowed.</p>
15	Throughout	<p>Wherever veterinary services are referred to as being utilised throughout the Standards and Guidelines, this must include the wording; “suitably experienced veterinarian” <u>and</u> “the veterinarian is engaged on a professional basis”</p>
16	Page 46	Spelling error in First aid kit list– “brandages” should be “bandages”