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Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

8 March 2019

Re: The feasibility of a National Horse Traceability Register for all horses

Dear Committee Secretary,

Thank you for the opportunity to contribute to this inquiry.

On Feb 27th the Horse SA Management Committee met, with the following discussed in relation to the current inquiry:

- 1) Horse SA is supportive of the ongoing investigation into the feasibility of a national horse traceability database.
- 2) To advise the Rural and Regional Affairs and Transport References Committee that in preparation of this submission that no direct survey of Horse SA members has taken place.

In preparation of this submission members were invited to comment and provide input. The submission is live between the days of 3-21 March on the publicly available webpage for this purpose (<https://www.horsesa.asn.au/feasibility-horse-database>).

The existence of the webpage, and the open invitation for members to contribute were promoted:

- a) In the Horse SA e-news 06/03/19, to a list of over 1900 live email addresses
- b) Several times on the Horse SA Facebook page with over 7,500 likes and many followers

In the Horse SA submission, 'horse' refers to all Equidae, including donkeys, hinnies and mules.

Again, thank you for the opportunity to provide comment.

Yours,

Denis Edmonds
Chair
Horse SA

Horse SA submission

(lodged 21.03.2019)

Horse SA is a non-profit community organisation which works with and for horse owners on a wide range of common interest topics, including recreational trails, sport horse welfare, biosecurity, land care and cultural heritage. Members include clubs from racing through to Pony Clubs, businesses and individuals. Established in 1999, further information about Horse SA can be found here: <https://www.horsesa.asn.au>

Introduction

On Feb 27th the Horse SA Management Committee met, with the following discussed.

- Horse SA is supportive of the ongoing investigation into the feasibility of a national equine traceability database
- To advise within the submission that no comprehensive survey of members has taken place in relation to this topic

Further, to note that the submission is was prepared in public view over a number of weeks on the Horse SA web page <https://www.horsesa.asn.au/feasibility-horse-database>. Suggestions for links or information were invited. In this submission ‘horse’ refers to all Equidae, including donkeys, hinnies and mules. After submission has been lodged with the inquiry, the web page will remain live and any subsequent uploads added will be identified by insertion of a date. The Inquiry is invited to visit the web page to access and download all relevant items referenced through hotlinks.

The cover letter signed by Horse SA Chair Denis Edmonds is reflective of above text.

Contents

The submission is divided into the following sections:

1. For the horse
2. Proposed benefit package for Australian horse owners
3. Reasons why horse owners may indicate they do not want a national horse traceability register

Section one: For the horse:

A register links a responsible person with every horse, at every point throughout their life. This is a very effective way to safeguard the welfare of the horse.

Section two: Proposed benefit package for Australian horse owners

If the inquiry proceeds to the next stage, we invite the Australian Government to consider a benefits package for Australian horse owners. The following may be considered:

a) Create a fairer playing field for the repayment of disease response levy

Rationale: When a declared disease outbreak occurs, Australian horse owners (as are other livestock species) required to pay back Government for the cost of management or eradication. At the time the \$0 based levy was agreed to, the only way feasible to collect was on manufactured feed and de-wormers as there was no national horse database. This is problematical also, as many horse owners have now moved away from de-worming every six weeks to targeted, strategic individual health plans, secondly, should de-wormers be activated as a collection point, it may inadvertently lead to welfare issues through horse owners choosing not to de-worm during the collection period. Therefore, a national database will create a fairer playing field, spreading the recovery cost over more horse owners who gained benefit from the disease management either regionally or nationally, while at the same time reducing the amount of time period required to impose the levy.

Should a database become established, a comprehensive review of the associated Acts would be appropriate. References: Horse Disease Response Levy Act 2011, Horse Disease Response Levy Collection Act 2011.

b) Ensure attributes to facilitate a targeted, cost-effective response - reducing pay back costs for horse owners.

Rationale: The Australian horse industry is a signatory (along with other livestock species) to the Emergency Animal Disease Response Agreement (EADRA). EADRA is a plan for how to manage different types of diseases, and how much of the cost of eradication horse owners will be required to pay back according to the classification of the disease, the impact to human health, trade or economy. Therefore, the register should provide attributes which support disease response roles. This in turn will reduce the total funds that national or regional horse owners are required to pay back as authorities were able to ensure a speedy, targeted response. For example, speedier responses to ensure less horses become sick or die (trace-back and trace-forward in disease timelines), wasting time looking for horses, over or underestimating international order for vaccines or other expenses are able to be better managed.

References: Emergency Animal Disease Cost Sharing Agreement, Animal Health Australia (EADRA) Guidance Documents Summary of the 2007/8 Equine Influenza Outbreak Australian Veterinary Journal Special Issue: Equine Influenza in Australia in 2007.

c) Build in mechanisms to strengthen consumer confidence within the Australian horse industry

Include platform attributes which will help horse owners, from buying a first pony through to entering international marketplaces. A horse with a unique ID, coupled with the associated benefits of a database, will build consumer confidence in the industry and enable progress to be made where gaps currently occur. Examples include:

- Identity of horses can be validated prior to purchase, sale, and for insurance purposes
- Electronic health records can be more easily updated, transferred
- Horse movement records required by different Australian states are validated/spot-checked against the actual horse moved
- Sport organisations can validate horses entered, ownership status
- Horse event organisers can better plan for, and manage biosecurity incidents
- Commercial transporters can chip-check and validate horses, and confirm payment requirements from correct owners
- Sale yards can confirm the identity and ownership of horses in and out, particularly sales outside of those associated with racing and studbook sectors.
- Improve confidence of horses sold or purchased online or through agents
- Horse breakers (educators), agistment centre managers and other industry professionals can ascertain horse ID, ownership and health status when taking on a horse
- Management of creditors, options for retaining/selling correctly ID horses under different state legislation
- Acts as a deterrent to theft and fraud (Example media story from UK)
- Support lifetime ID of cloned horses, and horses which in the future may have been influenced by other genetic and breeding technological advances.
- Act as a tool to promote confidence for on and off shore business investment into the industry

d) Build in horse owner benefits to make it easier to do business and grow our Australian industry

Modern database management systems can provide horse owners with a range of resources which support the establishment, growth and management of business. For example, the following could be investigated for inclusion:

- Free Apps to support the conduct of business, or events e.g. for stewards or on-course veterinarians to use
- Generation of data, maps, images, graphics and other tools using de-identified information which are required daily by government and business to ascertain the value of the Australian horse industry. (This is by far the most popular request which Horse SA is contacted for, and is currently a significant impediment to arguing investment cases e.g. new facilities or employment programs)
- A library of templates to support purchase and sale of horses, agistment or other services

- Promotion of educational events related to horse ID, health, movement and traceability
- Dissemination of disease alerts, research information, or grant opportunities. Owners could opt in/opt out of different levels of messaging.

e) To facilitate horse breeding administration practices

Linked to consumer confidence, a database can assist professional and amateur horse breeding through storage of test results for genetic hereditary diseases, performance traits, cloning or other genetic technological advances which are on the horizon.

Further, if genetic information is collected, then breeders can use this to better inform breeding programs into the future. However, this is likely to be a future use of the database due to the agreements that would need to be in place.

In addition, the database and connections with databases internationally will support ID of semen and other genetic materials and to trade as disease free, unless classified for scientific research purposes.

f) To support Australian horse owners to access international markets and trade horses (and genetic materials)

Australia (and other countries) are required to observe European Union Zootechnical and genealogical rules for trade of breeding animals and their germinal products, and for their entry into the EU. The rules require ID of horses, registration of breed studbooks, and rules relating to semen transport etc. Horse SA has written to the Trade Minister, Senator Simon Birmingham to seek clarification on the EU rules as it relates to the breeding and importing of Australian horses into the EU.

A presentation by Pamela Thompson, Deputy Director for Portfolio and Preparedness DEFRA, at the UK National Equine Forum 2019 explains what it means for UK horse owners to move their horses into the EU in the future. An Australian 'explainer' is also required.

e) Mechanisms to reunite owners and their horses after natural disasters, lost or stolen

The technical support for the management of animals involved in natural disasters is progressing rapidly, and Australia can benefit from technologies developed in other countries. One recent development is the New Zealand D4H Animal Incident Management Platform for Animal Evac NZ . Ideally, similar database features are integrated into a primary horse ID platform which will support emergency management planning, management and response. A central animal database to support animals in emergencies is

currently presented in a report to the NZ Parliament 'No animal left behind: Animal inclusive emergency management law reform' by Steve Glassey.

On a local scale, a horse may be involved in a road traffic incident or found wandering by local government or emergency services. Horse ID linked to a register facilitates a speedy reunion with the rightful owner.

f) Owners need to be able to state their preference if horses do or do not go to slaughter

- many owners would like to ensure horses do not go to slaughter as an end of life option
- for horses that are destined for the international human food chain, a register will provide relevant governments or related authorities with an improved form of food source traceability and to meet any other legislative and trade requirements.

g) Owners to gain benefit when Australia participates meaningfully within international horse ID networks

The rest of the world is moving forward on horse identification, and Australia needs the opportunity to meaningfully participate in forums such as the WHIRDEC (World Horses Identification and Registration Data Exchange Committee) meetings, where for example, protocols for data sharing (which differs from data storage) are discussed.

Further, Australia is in a better position to participate at international conferences and/or create our own national discussions similar to USA National Equine Forum: Advancing ID, Technology and Electronic Health Records.

h) Horse industry employers can utilise the register to assist with workplace safety compliance

For persons responsible for the supervision of new or inexperienced people in a workplace or at a business, or even in many cases for private purposes, it would facilitate validation of what the seller says is the background of the horse. A further example is to correctly ID a horse which may have been in a recent Hendra disease outbreak zone or other disease which may affect human health.

Reference: Managing Risks when New or Inexperienced Riders or Handlers Interact with Horses

i) Provide tools and levels of access to help club volunteers manage information and provide member services

Many breed societies and clubs are very small, volunteer run enterprises with even smaller budgets. Access (by control level) to help manage data as a stud book, club or to administer

for other purposes as info is 'on the cloud' means that even the smallest club should be able to provide professional level, globally competitive services for their members.

j) Database to recognise multiple forms of identification

The database will need to recognise multiple forms of permanent identification and documentation, for example, existing registration documents, passports, brands, DNA, bloodtyping, Iris scanning, and microchips. Modern technology can also incorporate the use of biometrics (Similar to Facebook face recognition technologies) so that horses can be identified by whorls and such in the future. This latter option may also suit improved wild horse management.

Protocols will need to be developed in relation to how different information interfaces with each other. For example, there is a project in Europe to look at using UELN[^] as the non-equivocal link between the horse's passport (ID document) and the original Passport Issuing Organisation (PIO), and to use the Microchip number as the link between the horse and it's passport (as the microchip does not give any details about the identity of the horse). Further, horses with multiple microchips can have all listed on the database to link records.

A further requirement will be to develop regulations about consistency in the source and type of microchips to be implanted into horses to ensure that the first digits denote Australia, and other issues, e.g. the microchip must be for use in horses, not wildlife, fish or other animals. We understand that other submissions to this inquiry will cover more detail about ULEN, Microchips and other forms of identification and associated existing databases.

Information:

Universal Equine Life Number (UENL) is an international horse identification system. First three digits are the code of the country in which the horse was originally registered. Second set of three digits are the database number of the organization issuing the registration number. Final set of remaining 9 digits are the registration number of the original horse. Final UENL = 15 digits displaying the original country of recording, the organization performing the registration, and the unique identification number of the horse. There are a number of Australian horse databases already issued a UENL including Harness Racing Australia, the Australian Stud Book, The Welsh Pony & Cob Society, the Australian Pony Stud Book, Australian Warmblood Horse Assoc. and the Arabian Horse Society of Australia. A UENL can also be applied to any horse with unknown pedigree. In the UK, organisations including The British Horse Society carry out the role of recording leisure horses.

References & database examples:

Contact: The Australian office for UENL Mrs Jane Evans

Dr Marta LaColla- Equine Microchips 101 (USA)

Dr Katie Flynn- Horse Identification Past, Present and Future (USA)
Why Equine Identification & Traceability (Youtube) - or PowerPoint only on Slideshare: Ms. Summer Stoffel, CEO at Equicore

Equine Iris Scanner

IrisTrac

Examples of Equine Databases

- UK Equine Register The Digital E-Stable
 UK National Equine Welfare Forum Presentation
 'Find out about the Central Equine Database'
- NZ Equestrian Sport NZ sport horse register
- USA Interview with Summer Stoffel about Equicore

 How technology is empowering the equine industry Equicore
- EU Max Becherer Pilot Data Exchange optimizing (inter)national I&R regulations
 WHIRDEC HorseLink project

 IFCE Brochure: SIREs database (France) page 8

Example of Enforcement

UK Passport FAQ

Section three: Reasons why horse owners may indicate they do not want a national horse traceability register

How do we get people to comply?

Potential solution: Regulations will be required, with promotional support from horse organisations and social leaders. For example, S.I. No. 62/2016 - European Union (Identification of Equidae) Regulations 2015., World Horse Welfare welcomes new DEFRA Regulations for Equine ID (2018), DEFRA information for horse owners

It will cost too much!

Potential solution: There will be a cost for establishing a register, which has to be weighed up. It would be preferable for a formal Australian government report to be prepared which outlines economic impact on different parts of the horse industry, including individuals and organisations. The report will also need to consider the 'for and against' the cost of

establishing a register for the collective of horse owners in Australia, and the cost of not doing so.

If we do pay, we get nothing for our money?

Potential solution: This is a genuine concern, and therefore Horse SA has invited individuals, clubs and businesses to submit to this current inquiry any potential benefits. This submission includes suggestions for a benefits package (refer above).

What about wild horses?

Potential solution: Wild horses form part of Australia's national herd, and have cultural heritage significance. As part of the national herd, wild horses are a stakeholder in Australia's biosecurity and food safety status, and as such ways to recognise these horses on the database should form part of investigations, potentially through the use of bio metrics (photographed ID characteristics), and record keeping post -capture.

What about if my horse is already registered?

Potential solution: Ideally, existing horse breeding or sport horse registrations stay on existing databases are linked on a national register platform via a Unique Equine Life Number. Listing a horse on a property identification code application (PIC) is not considered unique identification or registration of a horse.

Will laws have to be made or changed?

Potential solution: This is an important question, and as such it is recommended that a paper is prepared to provide an overview of where new Acts or Regulations are required or where updates to existing laws may suffice. This includes laws relating to the horse industry levy (discussed above), compliance with national and state biosecurity acts, state animal welfare, impounding and emergency management laws. A review of what it takes to consistently identify horses on a national basis, including compliance, national standardization of micro chipping protocols, alignment of state Property Identification Codes and branding laws etc.

A review will also need to consider trade and economic aspects including compliance with EU requirements and laws of countries where horse owners commonly do business both for live horses and genetic materials.

Thank you for the opportunity to contribute to this inquiry.