

Inquiry into the Australian horse industry and an Emergency Animal Disease Response Agreement (EADRA)

Queensland Horse Council Submission

The Queensland Horse Council Inc (QHC) is the state representative body for the Queensland horse industry. It is a not-for-profit organisation that represents the interests of the horse community across all sectors of the industry.

The QHC aims to represent the Queensland horse industry as a united voice to local, state and federal governments, promote relevant education, maintain a watching brief with regard to the welfare of horses and represent allied businesses and service industries.

The product which the horse industry brings to the Australian economy is unlike any other industry currently signed up to an EADRA. Its contribution to the nation's economy is invaluable and includes sport, recreation, tourism, transport, accommodation in regional towns and ancillary businesses (eg. veterinarians, farriers, equine dentists, produce stores, saddleries) as well as significant export and import industries.

The horse industry is not equipped to deal with EADR without the assistance of Government. Not only does it not have the resources, financial ability, manpower or legal authority, it is too diverse with many conflicting interests. There are sectors of the industry, racing and non-racing, whose priority is "back to business" at almost any cost, and others that consider the long term implications and are willing to make sacrifices, though these sacrifices are usually financially less than the professional participants.

The QHC has spent considerable time and effort alongside the AHIC advocating the need for the horse industry to sign an EADRA, the benefits associated, and the consequences if it doesn't. This need is now almost universally accepted across the industry.

The search for an equitable levy system has been exceedingly difficult and all of the levy options that have been suggested have shortcomings. The short timeframe set because of the PIMC decision and the various agendas of parties involved have stifled informed debate about the levy options. However, the zero-based levy does not come into play until an EADR is complete and has been audited, and the need to have the horse industry sign EADRA and be protected from disease incursion is paramount.

Manufactured horse feed

The manufactured horse feed levy would not apply to straight raw materials such as whole grain, rolled, cracked or steamrolled grains, products such as bran, millrun and pollard, protein meals such as soybean meal, full fat soybean meal, canola meal and sunflower meal, whole sunflower seed and vegetable oils, copra meal, lucerne, barley and grass hay, lucerne chaff and pellets, just to name some of the products fed to horses. All of these ingredients are easily accessible through produce stores and compete with manufactured feeds. Most are also available in bulk delivery.

The horse feed market also contains many supplementary feeding products – either mineral supplements (the same formulas that go into the manufactured feeds) or high protein supplements, containing protein meals, vitamins and minerals. These can form part of the feeding ration used by horse owners but under the definition would not attract a levy. We are told that the manufactured horse feed market takes up 3% of the market total of manufactured stock feed, but go to any produce store and the majority of feeds, either base materials or premixed, are stocked for and sold to horse owners. If sold as straight ingredients there is no levy, if blended together and sold as loose-mix or pelleted feed there would be a levy applied.

Inquiry into the Australian horse industry and an Emergency Animal Disease Response Agreement (EADRA)

Equine nutrition is not rocket science – there is an enormous amount of information available and with very little effort many are able and do formulate a sound feeding ration for their horses using commercially available ingredients and therefore would avoid a manufactured feed levy. The biggest advantage of manufactured horse feed is a reliable product that is very convenient. Horse owners and breeders are an astute and resourceful collection of people who receive very little in Government support when compared to European counterparts, and we predict in a post EADR situation, when a levy is imposed, there will be a mass exodus from the manufactured feed market. This will not have a huge impact on the very large feed manufacturers that also supply other livestock markets, but it will have a devastating impact on the manufacturers that specialise in horse feed, many of whom are major sponsors of equestrian events, competitors and research. Those promoting a levy mechanism on manufactured feed have either a lack of understanding of the complexity of the feed market and have proposed an overly simplistic view, or are actively promoting a levy that very few will have to pay.

Horse Wormer Levy

The horse wormer levy has a better chance of success than the feed levy, however it will target the horse owner with smaller numbers of horses. There are a large range of products intended for sheep and cattle using the same chemicals that are used in horse wormers which can be used on horses when dosed orally. These are already being used now on large equine operations as they are more cost effective, and though unpalatable are easily given by people who have the facilities and experience to deal with horses. Large horse operations can also economically import these products in bulk directly from overseas and there are quite a few cost sharing schemes where there is “wormer pooling” or selling on to neighbours or friends. Our concern is also that when combined with a failing feed levy, the burden placed on this one item will severely impact the industry not only on an equine welfare level, but subsequently make the above mentioned options even more cost effective and attractive.

Other Levy Options

There are various other levy options that have been put forward. Some have been dismissed because they have not been legally viable, and others have been stifled by deliberate misinformation and hysteria. The QHC feels that the horse registration and membership levy mechanism are options that have been misrepresented to the horse industry. It has been purported that this levy mechanism would be a huge burden on the non-racing sector due to their large reliance on voluntary support. The non-racing sector has a great dependence on volunteers; however most equine clubs and associations already impose their own levies. This may be for insurance reasons, DNA typing, registration or membership fees, grounds maintenance etc. These fees are usually then directed to a state or federal body or other organisations. It would be easy to imagine that these state or federal horse organisations, that often have paid staff including administrative staff that could deal with this relatively simple mechanism. Leakage of this levy mechanism would be minimal as registration with these groups is mandatory if people wish to compete, attend equine activities, breed and sell registered progeny. It is our understanding that DAFF will play a supportive role in explaining the levy collection mechanism to parties required to collect and submit monies.

There are many avenues for exotic diseases to enter the country, not just quarantine stations and the importation of horses. Many of the deadly and costly diseases are likely to come in through our northern borders via vectors such as insects or migrating animals and birds, and in this regard Queensland is particularly vulnerable. There is also the strong possibility of people bringing in an exotic disease via used horse gear which hasn't been declared or treated.

Inquiry into the Australian horse industry and an Emergency Animal Disease Response Agreement (EADRA)

The horse industry should be acutely aware that emerging infectious diseases such as Hendra virus can come out of apparently nowhere and cause complete devastation to those affected. The acceptance of EADRA also gives the horse industry the ability to argue for the reclassification of some categories of diseases which by their nature pose significant risks to human health, and therefore should be wholly the responsibility of Government eg. Hendra virus should be changed from a Category 2 to a Category 1.

No organisation, government or industry, performed with great distinction during the 2007/2008 Equine Influenza crisis. It was an incredibly hard lesson inflicted on the horse industry. The QHC feels that if it is shown that there was serious neglect of quarantine requirements or a decision by government that was opposed by industry, then the burden for paying for any subsequent incursion should fall onto that authority.

Equally, the horse industry has to become more aware, educate and be educated, to ensure good biosecurity practices are in place at all levels, whether at individual horse properties, local events and trail rides, or major equestrian competitions. The QHC has been proactive on this issue with a published and flexible Emergency Response Plan which works alongside the various EADRA plans. We also have conducted regular workshops (27 in the last year) on biosecurity and infection control. We have also supported and worked with Biosecurity Qld in their work with horse event organisers to implement Horse Event Biosecurity Plans.

In Summary, QHC thinks that the manufactured horse feed and horse wormer levies would be likely to fail as an equitable collection system, and in the case of horse feed, likely to fail completely. Because many sectors of the horse industry have seen these as easy options they wouldn't have to deal with, debate on any other options is effectively finished. The QHC feels that in the interests of at least having some collection system and therefore the ability to sign EADRA by the required timeline, the horse industry should go forward with these options with the proposed review in 4yrs. We just hope that there is not an EADR in that time, and that a more equitable solution can be found in the interim.



Debbie Dekker

On behalf of the
Qld Horse Council
Board of Directors