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Dear Allison

Draft Welfare Standards & Guidelines for the Land Transport of Horses - RSPCA Submission

RSPCA Australia, in consultation with our member societies, appreciates the opportunity to provide comment on the draft Standards & Guidelines for the Land Transport of Horses.

There are several specific points we wish to highlight from our submission:

- having a separate section for feral horses as there are distinct challenges and issues relating to feral horses compared to domestic horses
- establishing a standard requiring all horses to be transported individually through partitions or other appropriate methods, rather than in groups, to minimise risk of injury, stress and limiting access to feed and water where provided on board
- establishing a standard where transport is not permitted due to an unacceptable risk of heat stress based on scientific evidence
- identifying and minimising the extent of problems with on-board drinkers due to spillage and leakage which may lead to slipping and also increased urine output if horses are not unloaded at appropriate intervals
- conducting more research to provide evidence-based data regarding heat stress, fatigue and consumption of water and feed on board vehicles during long duration journeys.

Please find attached general comments as well as specific comments on the current standards and guidelines and the amendments proposed by your department.

We look forward to being consulted on any further developments in the drafting of this important chapter.

RSPCA Australia

Yours sincerely



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DRAFT WELFARE STANDARDS & GUIDELINES FOR THE LAND TRANSPORT OF HORSES

RSPCA SUBMISSION

GENERAL COMMENTS

1. Draft consultation process

The RSPCA considers that due to the complexity of horse transportation, it is important to consult all key stakeholders as part of the development phase of the first draft. RSPCA supports involvement of a stakeholder advisory group in the early stages of the review and development of animal welfare standards and guidelines.

2. Feral vs non-feral horses

Given the greater welfare and OH&S risks associated with handling and transporting feral horses, the RSPCA recommends that a separate section be developed for feral horses. For example, there are risks relating to segregating a band of mares and their stallion for feral horses compared to domesticated horses. Individual segregation of feral horses on trucks is unlikely to be possible without creating unacceptable OH&S risks. Note: the term 'feral' does not include unhandled domesticated horses but only those who have no dependence and contact with humans.

3. Transportation of groups vs individually segregated horses (non-feral)

Given the issues relating to access to water, injuries, stress due to unfamiliar horses and unfamiliar surroundings, the RSPCA recommends that all horses are individually transported, i.e., no 'bulk' transportation permitted. Horses who have been accustomed to loading and transport in high quality floats or customised horse transporters for several years should not be subjected to adverse conditions and risks posed by a group transport environment. As rehoming of retired racehorses increases, and racing jurisdictions promote on-farm humane killing of horses unsuitable for rehoming, there is likely to be a decline in the transportation of groups of horses to abattoirs and knackeries.

4. Consideration of mandatory driver fatigue stops

We also recommend that consideration be given regarding driver stops in relation to offloading horses. This would provide an ideal opportunity for horses to spell, exercise, as well as access feed and water.

5. Quality of facilities for offloading horses

We recommend that criteria are provided to ensure that appropriate facilities/premises are used for spelling horses during long duration journeys to ensure optimal welfare.

6. Evidence-based recommendations

Some standards and guidelines have been suggested without sufficient evidence being presented to support them. We recommend that proposed standards and guidelines be clearly underpinned by citing appropriate valid references. Where gaps or available information is inconclusive, further research should be conducted to resolve the lack of verified data, e.g. around heat stress, fatigue and consumption of water and feed on board vehicles during long duration journeys.

SPECIFIC COMMENTS ON THE CURRENT HORSE CHAPTER AND AMENDMENTS PROPOSED BY QDAF

S&G Land Transport of Livestock - Horses	QDAF proposed amendments	RSPCA comment
N/A	A new standard is proposed that requires a written record of last access to water, regardless of journey time [see SA1.2].	We support a written record, however, access and actual drinking are not the same and therefore some individual horses may not drink for over 12 hours which is a significant risk during hot weather.
N/A	A new standard is proposed to prohibit the use of double-decker trailers to transport horses.	Agree
N/A	A new standard is proposed to require bedding on the floor of a vehicle for journeys longer than 24 hours.	<p>Bedding is mainly recommended to absorb urine and faeces during transport especially if horses are not unloaded for 36 hours. It is also important to consider the type of feed provided within 24-48 hours of loading and during transport to minimise loose faeces, i.e., must be dry feed. Consideration should also be given to the use of rubber matting or other suitable material to minimise the floor surface becoming slippery. Essential features of bedding which may affect welfare should also be included in the standard.</p> <p>It may not be desirable for horses to lie down during transport due to the risk of trampling (if group transport) and difficulty rising at the destination point after long journeys. These aspects must be considered. the RSPCA</p> <p>Horses must be unloaded after 20 hours (see Padalino et al. 2015 - horses are at greater risk of gastro-intestinal and respiratory problems).</p> <p>Bedding must be provided for journeys beyond 8 hours duration, where horses are not unloaded and for horses individually segregated.</p>

N/A	A new standard is proposed that requires hind shoes to be removed where horses travel in groups to sale or slaughter.	We support this new standard but are concerned that the requirement is dictated by the destination of the horses rather than based on the main factor posing the risk of injury which include unfamiliar horses travelling in groups with no partitions (this is mentioned in GB8.27).															
N/A	A new standard is proposed to prohibit cross-tying to restrain horses during transport.	Agree															
<p>SB8.1 A person in charge must ensure time off water does not exceed the time periods given below for each class of horse:</p> <table> <thead> <tr> <th>Class</th> <th>Max TOW (hrs)</th> <th>Min Spell (hrs)</th> </tr> </thead> <tbody> <tr> <td>Horses > 6mths</td> <td>24</td> <td>12</td> </tr> <tr> <td>Lactating mares</td> <td>12</td> <td>12</td> </tr> <tr> <td>Foals < 6mths</td> <td>12</td> <td>12</td> </tr> <tr> <td>Mares known to be < 7.5 mths pregnant, excl the last 4 wks</td> <td>12</td> <td>12</td> </tr> </tbody> </table>	Class	Max TOW (hrs)	Min Spell (hrs)	Horses > 6mths	24	12	Lactating mares	12	12	Foals < 6mths	12	12	Mares known to be < 7.5 mths pregnant, excl the last 4 wks	12	12	<p>Horses are to be provided with reasonable access to water prior to loading.</p> <p>Horses are not required to be provided with water during a journey of less than 4 hours.</p> <p>During a journey of at least 4 hours but less than 8 hours, a horse is to be provided with either</p> <ul style="list-style-type: none"> continuous access to water; or a 30 minute water stop every 4 hours. The water stop may be provided without unloading the horse from the vehicle. <p>• During a journey of 8 hours or more a horse is to be provided with:</p> <p>EITHER:</p> <ul style="list-style-type: none"> Sufficient space for the horse to lie down and absorbent bedding or drainage provided to remove urine, and a 30 minute water stop every 4 hours. The water stop may be provided without unloading the horse from the vehicle, and A stop of 30 minutes every 8 hours where the horse is offered water and feed. This stop may also be provided without unloading the horse from the vehicle. <p>OR</p>	<p>The proposed new standard does not specify that this relates only to horses >6mths old. This needs to be specified. Also, what do we know about transport risks of older horses (i.e., >20 yrs of age). Does this need to be considered?</p> <p>Agree that no water or feed is required for journeys up to 4 hours.</p> <p>Agree that for journeys of 4-8 hours, water must be provided every 4 hours or continuously.</p> <p>The proposed standard provides two options for journeys over 8 hours.</p> <p>The first option proposes that horses do not need to be unloaded every 8 hours with the second option permitting unloading every 8 hours. The RSPCA is concerned that there is insufficient evidence to show that either option will result in acceptable welfare outcomes in relation to whether horses should be unloaded or not every 8 hours. However, based on the Padalino et al (2015) study, the RSPCA supports horses being unloaded after 20 hours of travel.</p> <p>There are concerns regarding logistics of unloading at 8 hours in terms of the impact on</p>
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Horses > 6mths	24	12															
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	<ul style="list-style-type: none"> - a 30 minute water stop every 4 hours. The water stop may be provided without unloading the horse from the vehicle, and - A stop of 30 minutes every 8 hours where the horse is unloaded and offered water and feed. 	<p>the horses and the suitability of premises regarding, quality of the yards, noise & activity level, segregation from unfamiliar horses etc. This would require planning and prior approval as well as consideration of biosecurity requirements.</p> <p>The manner in which on-board water would be provided to horses needs to be clarified.</p> <p>A key issue is whether horses have drunk during these stops especially during hot weather. If horses remain in the vehicle, a record must be kept of which horses drank at each stop. Also there are concerns that 30 minutes may not be sufficient to allow all horses to drink. More research is required to determine the impact of not drinking at various stages of long duration journeys. Perhaps the 8-hour stop should be extended if not all horses who didn't drink at 4-hours have not drunk within 30 minutes? If individual horses are separated and have easier access to food and water, then there may not be a requirement to unload on the basis that their welfare is not compromised.</p> <p>The absorbent bedding needs to be described in terms of thickness and quality etc.</p>
SB8.2 If horses over six months old have been off water for 24 hours, the person in charge must ensure the horses have a spell for 12 hours before starting another journey.	A spell of 12 hours after 24 hours will no longer be required, as the new standards [should] provide conditions suitable for a 36 hour journey.	<p>We do not support a continuous journey length of 36 hours without unloading, based on the increased risk of gastro-intestinal and respiratory conditions after 20 hours of transportation as reported by Padalino et al. 2015.</p> <p>NOTE: Based on SB8.1, it is understood that the following will be retained - lactating mares, foals and pregnant mares known to be more than 7.5 months pregnant excluding the last four</p>

		<p>weeks have been off water for 12 hours, the person in charge must ensure the horses have a spell for 12 hours before starting another journey. This should be clarified.</p>
SB8.3 Journey time may be extended for horses to 36 hours only if each of the following conditions are satisfied:		<p>It is not clear when the requirement for feed and water commences, i.e., is this from the start of the journey or after 24 hours?</p> <p>As previously stated, we do not support 36 hours continuous journey. However, prior to 36 hours without unloading being permitted, data must be collected from actual journeys to verify that there are no welfare risks. Furthermore, under (v), 'regular' assessments should be defined as this is open to interpretation and could, for example, range from every hour to every 4 hours. Animals should be checked at least every 2 hours.</p>
SB8.4 Mares known to be in the last four weeks of pregnancy must only be transported under veterinary advice unless the journey time is less than four hours.		<p>This standard must also indicate a maximum journey time for pregnant mares transported under veterinary advice and travelling more than 4 hours.</p> <p>The word 'known' may provide a loophole. If a person claimed they did not know and did not take the necessary steps to determine the stage of pregnancy, then this could be used as a defense thus avoiding a breach of this standard. Recommend deleting the word 'known'.</p>
SB8.5 A person who transports a foal with its mother for a journey time of more than five hours must provide sufficient space on the vehicle for the foal to suckle and lie down.	<p>It is proposed that a new standard be introduced that prohibits the transport of new-born foals with unhealed navels unless a veterinarian has approved the transport in writing.</p>	<p>We recommend that the requirement is that only foals with 'healed' navels are to be transported and to include a description of 'healed', i.e. as described in Animal Welfare S&Gs for Land Transport of Livestock - G4.4</p>

		<p><i>...have a navel cord that is wrinkled, withered and shrivelled and not pink or red coloured, raw or fleshy.</i></p> <p>Consideration should also be given to foals being sufficiently strong and steady on their feet to cope with transport.</p> <p>We recommend that a mother and foal (less than 4 weeks of age) is not transported more than 4 hours without veterinary advice. Written veterinary approval should include an email or text message and the veterinarian must have access to video footage etc. to adequately assess individual horses.</p>
SB8.6 A person must not transport a horse of equine lameness score four and five (see lameness score assessment table below) unless veterinary advice is obtained.		<p>It is recommended that GB8.2 becomes a standard - see comments at GB8.2. Weight shifting should be included in this requirement.</p>
SB8.7 A person who uses a vehicle which has stalls and pens to transport horses must ensure that each horse stall or pen can be accessed easily for feeding, watering and visual inspection. All vehicles must contain nonslip flooring and walls of sufficient strength to withstand horse activity.		Agree
SB8.8 A person who uses a vehicle which is fully enclosed and environmentally controlled must ensure the vehicle has effective airflow with equipment providing at least 12 air changes per hour.	<p>It is proposed that a new standard be introduced that requires any vehicle used for horse transport has overhead shelter.</p>	<p>A standard must be included which refers to adequate ventilation in vehicles. If SB8.8 is to be retained, ventilation must not be affected when the truck stops or the engine is turned off. Is 12 air changes per hour sufficient in hot weather to help mitigate heat stress?</p>
SB8.9 A person who uses a vehicle to transport horses must ensure there is a vertical clearance of at least 2.2 m between the livestock crate floor and overhead structures. This does not apply to horse floats and two-horse trailers, which must adhere to SA3.1v.	<p>Amended to being 1.5 times the height of the tallest horse's withers</p>	<p>Rather than having a height dimension stipulated, the requirement should be for sufficient clearance to avoid contact with overhead structures when horses flick their head up/back.</p>

SB8.10 A person transporting a stallion unused to being handled must segregate it from other classes of horses.	It is proposed that a new standard be introduced that prohibits handled and unhandled horses being mixed for transport.	All horses must be segregated unless they are familiar with each other and will not pose a risk of injury especially regarding access to food and water provided on board. If this recommendation is not accepted, then in addition to the proposed new requirement that handled/unhandled horses are not mixed, all horses who are not familiar with each other should not be mixed.
SB8.11 A person must not use an electric prod on a horse during the transport process.		Agree
SB8.12 A person must not use a dog to move a horse during the transport process.	There is a need to clarify that dogs are not to be used to work horses during the transport process. It is proposed to clarify that dogs must not be used to work horses during transport by removing mention of horses from general standard SA5.11 and removing GB8.31. This will prevent confusion.	Agree
SB8.13 A person transporting horses across Bass Strait must individually stall them, except for mares with foals at foot, which must be stalled together.	No change indicated.	Agree but also recommend that information relating to the recent tragedy involving multiple polo horses is used to inform this standard to ensure that this incident cannot occur in the future.

GUIDELINES

S&G Land Transport of Livestock - Horses	QDAF proposed amendments	RSPCA comment
N/A	A new guideline should recommend the use of on-board watering systems.	Agree. The guideline should include reference to different types of on-board watering systems as well as describing the essential features of such systems, including that they do not leak or spill water onto the floor of the transport vehicle.
N/A	New guidelines are proposed that recommend that: <ul style="list-style-type: none"> horses are to be assembled for transport when temperature is less than 27 degrees Celsius, and 	We support the use of Wet Bulb Global Temperature (WBGT) as the parameter rather than ambient temperature as the WBGT considers relative humidity.

	<ul style="list-style-type: none"> horses are transported at night during very hot weather. 	<p>A new standard must be included that prohibits the loading and transport of horses in non-climate controlled vehicles when WBGT exceeds a threshold that has been determined based on scientific evidence where some horses would experience even mild heat stress.</p> <p>If this proposed guideline remains, then the critical temperature needs to be underpinned by scientific evidence that horses will experience discomfort if subjected to transportation at this temperature.</p>
N/A	A new guideline is proposed to recommend that horses travel in a backward facing position	Agree
N/A	<p>A new guideline is proposed that would recommend that bedding be:</p> <ul style="list-style-type: none"> one centimetre thick for every 100 kilometres of journey dry, clean, and absorbent cleaned, replaced or refreshed at least every 24 hours soft wood shavings or straw dust and splinter free. 	Bedding quality must be included as a new standard rather than a new guideline. Where bedding is provided (for journeys ≥ 8 hours as proposed above and for horses in poor body condition as proposed at GB8.6), the bedding must not cause discomfort or risk injury to horses.
N/A	A new guideline should recommend that if horses are to be restrained for transport, they are tied in a way that allows the horse its full range of head movement, for example by a single rope under the chin with the other end of the rope tethered at wither height. The restraint should not prevent access to food and water.	The risk of injury or worse due to incorrect restraint is such that this proposed new guideline must be a new standard.
Fitness		
GB8.1 Additional considerations for horse welfare should be made for long-distance travel: <ul style="list-style-type: none"> for horses over six months old after 12 hours off water 	<p>A new guideline should also recommend that recently weaned foals be given access to water during transport.</p>	<p>Suggest that 'recently' is defined and recommend up to one month after weaning.</p> <p>This guideline is not consistent with the new proposed standard to provide water every 4 hours and feed/water every 8 hours on longer journeys.</p>

<ul style="list-style-type: none"> • for lactating mares after eight hours off water • for foals under six months old after eight hours off water • for mares in the third trimester of pregnancy after five hours off water. <p>These considerations should include:</p> <ul style="list-style-type: none"> • that the horses are fit for the remainder of the intended journey • that prevailing or predicted weather conditions are favourable • additional spell times during the journey • a longer spell time at the end of the journey • the recent management of the horses before first loading 		
<p>GB8.2 Conditions that could adversely affect horse welfare during transport and should be considered in the assessment of fitness for the intended journey. Such conditions might include any signs of colic, raised or lowered body temperature, lethargy, and profuse diarrhoea, disease, or wounds or abscesses. A decision to transport a horse with the above conditions should be made only after considering the welfare of the animal concerned and the treatment and management options.</p>		<p>SA4.1 in Part A of the land transport standards lists the general fit to load criteria. GB8.2 must be a standard rather than a guideline to ensure that conditions specific to horses and not listed under SA4.1 are part of the fitness criteria and horses with any of these conditions not transported unless under veterinary advice.</p>
<p>GB8.3 Mares in the last trimester of pregnancy and those in early lactation should not be transported for periods longer than eight hours to reduce the risk of metabolic disease and herpes virus related abortions. They should be provided with water, food, space to lie down and rest for 12 hours before reloading.</p>		<p>A standard must be introduced which limits the journey time to a maximum of 8 hours for lactating mares and mares in late pregnancy (but not in last month, where maximum journey time must not exceed 4 hours)</p>
<p>GB8.4 Mares in the last month of pregnancy should not be transported unless under veterinary advice, which should include the following provisions:</p>		<p>This guideline must be made a standard with a maximum journey time of 4 hours. Note: If this is adopted, the first dot point is irrelevant and the last dot point appears to be</p>

<ul style="list-style-type: none"> • water-deprivation time should not exceed five hours • feed and water should be provided immediately before loading and on unloading • additional space should be provided on the vehicle to enable the mare to lie down • the mare should be separated from other horses • veterinary advice should be sought. 		superfluous if these mares are only transported under veterinary advice.
<p>GB8.5 Mares that have given birth should not be transported within seven days of foaling except when under veterinary advice or travelling for treatment. In this case, adequate space for lying down, and bedding, feed and water should be provided. Horses should also be able to be inspected.</p>		<p>The risk to the welfare of recently foaled mares is such that this guideline must be a standard and these horses are only transported when strictly necessary and under veterinary advice.</p>
<p>GB8.6 Horses should be at least a body condition score of 2 before transport, as described in the table below. Horses below condition score 2 should only be moved after veterinary advice and for the shortest distance necessary.</p> <p>Body Condition Score Description</p> <p>0 Very poor Very sunken rump, deep cavity under tail, skin tight over bones, very prominent backbone and pelvis, marked ewe neck</p> <p>1 Poor Sunken rump, cavity under tail, ribs clearly visible, prominent backbone and croup, ewe neck (narrow and slack)</p> <p>2 Moderate Flat rump either side of backbone, ribs just visible, narrow but firm neck, backbone well covered</p> <p>3 Good Rounded rump, ribs just covered but easily felt, no crest, firm neck</p> <p>4 Fat Rump well rounded, gutter along back, ribs and pelvis hard to feel, slight crest</p>	<p>It is proposed that the standards require that a horse with a body condition of 0 or 1 must only be transported under written advice from a vet.</p> <p>A guideline should recommend that a horse with a body condition of 0 or 1 only travel the shortest distance necessary.</p>	<p>Horses in very poor condition must only be transported as a measure of last resort and supports the proposed new standard requiring horses with BCS 0 or 1 only be transported under veterinary advice and when the consequences of not transporting them would result in a greater compromise to their welfare.</p> <p>The proposed guideline must be a standard given the poor condition of these horses and their ability to withstand long journeys. A maximum journey time of 4 hours must be included in the standard. A requirement for bedding and sufficient space must also be included in the standard to allow these weakened horses to lie down in reasonable comfort.</p>

5 Very fat Very bulging rump, deep gutter along back, ribs buried, marked crest, fold and lumps of fat		
GB8.7 Lameness assessment should be made using the equine lameness scoring system described in the table below. Score Equine Lameness assessment 0 Lameness not perceptible under any circumstances 1 Lameness difficult to observe, not consistently apparent regardless of circumstances (e.g. weight carrying, circling, inclines, hard surface) 2 Lameness difficult to observe at a walk to trot in a straight line (e.g. weight carrying, circling, inclines, hard surface) 3 Lameness consistently observable at a trot under all circumstances 4 Lameness obvious, marked nodding, hitching and/or shortened stride 5 Lameness obvious, minimal weight bearing in motion or rest, inability to move		The term 'weight shifting' should be included in the examples for lameness scores 1 and 2 as this action suggests pain and should be investigated prior to transport. It should be noted that SA4.1 fit to load criteria require weight-bearing on all legs.
Food and water		
GB8.8 Adult horses should be fed and watered at floor level every five hours and as soon as possible after unloading, with a suitable quality and quantity of feed and water to minimise colic risk.		Additional wording should be included in this guideline to ensure feed and water is also provided in a manner that avoids competition. To ensure there is no conflict with the proposed new standard (see SB8.1) requiring water every 4 hours, this guideline should be amended to recommend that feed and water be provided every 4 hours.
Loading density		
GB8.9 The following minimum space allowances should be provided:	It is proposed that the minimum space allowances in Table 1 below will replace GB8.9 and be included as standards.	We support in principle the journey types and associated criteria outlined in the proposed space allowance table and their inclusion as standards. Space allowance for animals in transport is
Class	Floor area (m²/head)	

Adult horses 1.2 Horses 18-24 mths 1.0 Horses 12-18 mths 0.9 Horses 5-12 mths 0.7		usually calculated on body weight rather than animal age. RSPCA suggests including the formula for calculating standing space allowance for animals based on their body weight.
GB8.10 The number of bays provided on the vehicle should be selected according to the duration of travel; the airflow capacity of the vehicle; the size, class and condition of the horses; and whether feed and water is to be provided during the journey.		Agree.
GB8.11 Mares with foals at foot and young horses should be provided with additional space to allow the foal to suck, and both foals and young horses to lie down as required.		Agree.
Vehicle and facilities		
GB8.12 Pens or stall partitions should be strong and safe, allow air flow and be removable if an animal collapses.		Agree. If horses are to be transported in groups, then a new standard is required that recommends a suitable number of partitions are provided to accommodate the number of horses travelling on the vehicle, the level of handling to which the horses are accustomed and the extent to which horses are familiar with each other. Without sufficient partitions, horses may be injured or killed due to falling and trampling.
GB8.13 Stalls should be at least 700 mm wide and 2350 mm long to accommodate larger horses and those over 15 hands tall.		700mm x 2350mm = 1.65m ² , which is inconsistent with the minimum floor space proposed in Table 1. Ensure consistency between guidelines and any changes to space allowance in the final document.
GB8.14 Walls should be padded or constructed using a suitable material to avoid rubbing or injury, from a level of 75 cm above the floor to a height level with the animal's back. Padding may be required to protect the animals' head.		Agree.
GB8.15 Bows on body trucks and single-deck semitrailers should be at least 2 m high and		GB8.15 will need to be amended if the recommendation in Table 1 re the height of any

padded to their full length to a thickness of two cm of soft material.		overhead structures (1.5 times the height of the tallest horse's withers) is accepted.
GB8.16 A mechanical means of forcing air circulation should be installed for enclosed vehicles, unless vents with natural airflow are provided and are effective. Effective airflow may reduce the impact of heat during transport and travel sickness in horses.		GB8.16 must be a standard to ensure that all enclosed vehicles have effective mechanical ventilation to maintain horse comfort throughout the journey. Natural airflow through vents, particularly when the vehicle is stationary, is insufficient to mitigate the risk of heat stress. The additional reference to 'horse comfort' assists with explaining the intent of the proposed standard.
GB8.17 For controlled environment vehicles, temperature gauges and the airflow system should be checked before transport and every three hours during transport. Alarms or a monitoring system should be fitted to alert the driver to any problem.		GB8.17 must be a standard to ensure enclosed transport vehicles have fully operational ventilation systems that ensure horse comfort throughout the journey. Inspection of their operation should be in line with inspection requirements outlined in SA5.14, i.e., before departure, within the first hour of transport, and then every three hours. Alarms or monitoring systems are vital to alerting the driver to problems with the ventilation system, particularly in between designated inspection times. As such, this part of GB8.17 must be a standard.
GB8.18 Horses may baulk from hollow sounds caused by walking on ramps. This can be alleviated by using matting or providing earth, sand or sawdust on the floor of the ramp and vehicle.		GB8.18 must be a standard to facilitate low-stress loading, e.g. 'The floor of the un/loading ramp must be covered in matting or other non-slip, noise-dampening material to avoid horses baulking at loading or unloading.'
GB8.19 Flooring should be cleaned before transport. Floors should be drained, absorbent or covered with material to absorb urine when transporting for longer durations.		Flooring should be clean before transport and this aspect of GB8.19 must be a standard to help ensure horse comfort.
<i>Two-horse trailers</i>		
GB8.20 Where a single horse is being transported in a two-horse trailer, the horse		Agree.

should be placed on the driver's side of the trailer or float.		
GB8.21 Where two horses are travelling in a two-horse trailer, the larger or heavier horse should be penned on the driver's side.		Agree.
Handling		
GB8.22 Horses that are unfamiliar to each other may become aggressive or stressed during the journey and should be segregated. The group should be assessed before loading to determine likely aggressive behaviour and whether segregation is needed.	<p>A new guideline should recommend that any mares in heat are segregated as far as possible from stallions.</p> <p>A new guideline should recommend that any means of segregation should allow social contact but prevent kicking or biting.</p>	<p>We support the intent of the proposed new guidelines however, with regard to mares and stallions, this must be a standard stating that they not to be transported in the same vehicle with the exception of feral horses where a stallion may become distressed if separated from his mares.</p> <p>The reference to assessment of aggressive behaviour and potential need for segregation is covered by SA5.6iii and could be deleted.</p>
GB8.23 All stallions should be segregated.	It is proposed that the current guidelines about stallions, unhandled horses, pregnant mares, and mares with their foals being segregated from other animals be elevated to standards.	SB8.10 requires unhandled stallions to be segregated. RSPCA supports the proposal that guidelines relating to segregation of other classes of horses be elevated to standards, however exceptions must be made for feral horses where segregation is likely to cause distress and increase the risk of injury. See comment at GB8.24.
GB8.24 Unbroken horses, pregnant mares, mares with foals at foot and animals that have health conditions should be segregated.	See GB8.23	See comment at GB8.23. The proposed standards must clarify what is meant by segregation and would benefit from dot points outlining the specific segregation requirements for each class, e.g. segregation of stallions via individual partitions, mares with foals at foot similar, pregnant mares can be together but segregated from other classes, etc. Again, allowance must be made for the specific needs of feral horses.
GB8.25 Horses should not be routinely sedated for travel. If sedation is necessary, it should be administered by a veterinarian. Sedated horses should be stabilised if possible, segregated and not unduly affected by the motion of the		<p>Segregation of sedated horses is essential, e.g. to avoid injury or risk of trampling should the horse go down.</p> <p>We propose the following standards:</p>

vehicle. Action should be taken immediately on identifying a recumbent horse to separate it from other horses to avoid injury.		<p>‘Horses must not be routinely sedated for travel.’;</p> <p>‘If sedation of horses is considered necessary, sedation must be administered by a registered veterinarian’; and,</p> <p>‘If sedation of horses is considered necessary, sedated horses must be segregated.’</p>
GB8.26 Where horses are rugged, airflow should be appropriate so that horses do not overheat and become dehydrated. Fitted hoods, blinkers, knee or hock caps, pads and bandages may protect horses during transport.	<p>The guideline should also be amended to recommend that various protective options not be used on horses that are not already accustomed to them before transport.</p> <p>Horse boots are widely used to prevent leg injuries. They should be mentioned in the guidelines as an option.</p>	<p>There is a risk of overheating if horses are rugged during transport. A new standard is required stating that horses are only to be rugged during transport to minimise the risk of hypothermia.</p> <p>The proposed new guideline recommending that horses are accustomed to protective options before using them during transport must be a standard.</p> <p>We support the proposed addition of ‘horse boots’ to GB8.26.</p>
GB8.27 Where there are no partitions on the vehicle, or where horses are travelling in groups, hind shoes should be removed.		<p>This guideline should be removed if the new standard regarding hind shoes is introduced. If this is not introduced, then GB8.27 should be amended and based on risk of horses kicking each other, e.g. familiarity, rather than suggesting that this is necessary for all horses.</p>
GB8.28 Manual lifting of foals is permitted for animals that may have difficulty in negotiating ramps.		<p>SA5.7 unacceptable handling. This guideline could be strengthened by describing best practice manual lifting of foals and clarify that it refers to perinatal foals. Where older foals and other classes of horses have difficulty negotiating ramps, the cause of the problem should be investigated and addressed. This should be included as a guideline.</p>
GB8.29 Unbroken horses should be trained in basic handling practices before transport.	<p>Additional detail should be added to the guidelines on training horses to be handled before transport. Unhandled or inexperienced animals should be treated with extra caution. They should have more time to get used to their</p>	<p>We support the proposal to include additional detail in this guideline, however, the needs of feral horses as distinct from unhandled horses should be taken into consideration.</p>

	surroundings. Unhandled horses in small groups can be taught loading by feeding them next to the vehicle, then from the ramp, then inside the vehicle.	
GB8.30 Horses should be unloaded during water and rest stops to allow exercise.		Agree
GB8.31 Dogs should not be used to move horses.	To be deleted	We support the deletion of GB8.31 as it is covered by SB8.12.
Humane destruction		We do not support use of the word 'destruction' to refer to the killing of animals. Propose amending to 'humane killing' or where suffering is alleviated by humane killing, the appropriate term to use is 'euthanasia'.
GB8.32 The recommended methods for humane destruction of horses include: <ul style="list-style-type: none"> for horses over six months old – a firearm aimed in the frontal position or lethal injection for foals under six months old – a firearm aimed in the frontal position or lethal injection. 		We support GB8.32 remaining unchanged with the exception of the term 'humane destruction' or where suffering is alleviated by humane killing, the appropriate term to use is 'euthanasia'.
GB8.33 A rifle shot by the frontal method (see Figure B8.1) is the preferred method of humanely destroying horses. For adult horses, a rifle should deliver at least the muzzle energy of a standard 0.22 magnum cartridge. For foals, a rifle should deliver at least the muzzle energy of a standard 0.22-long rifle cartridge.		We support GB8.33 remaining unchanged with the exception of the term 'humanely destroying' which should be amended to 'humane killing' or where suffering is alleviated by humane killing, the appropriate term to use is 'euthanasia'..

Reference

Padalino, B., Hall, E., Raidal, S., Celi, P., Knight, P., Jeffcott, L. and Muscatello, G., 2015. Health problems and risk factors associated with long haul transport of horses in Australia. *Animals*, 5(4), pp.1296-1310.

Table 1 – Space allowance proposals for new standards

Journey type	Criterion	Minimum dimensions (must meet criterion <u>and</u> be no less than measurements below)
Horses over six months for journeys: <ul style="list-style-type: none"> • up to 8 hours, and • 8-24 hours where horses are unloaded and offered food and water every 8 hours. 	Sufficient space to maintain comfortable standing position and balance, and allow for full range of head motion without contacting ceiling or overhead structures.	Floor space 1.9m ² per animal Height from floor to ceiling of any overhead structures - 1.5 times the height of the tallest horse's withers
Horses over six months for journey: <ul style="list-style-type: none"> • 8-24 hours where horses are not unloaded • 24-36 hours 	<ul style="list-style-type: none"> • Sufficient space to maintain comfortable standing position and balance, and allow for full range of head motion without contacting ceiling or overhead structures. and • Sufficient space to lie down. 	Floor space 2.4m ² per animal. Height from floor to ceiling of any overhead structures - 1.5 times the height of the tallest horse's withers
A foal with its mother	<ul style="list-style-type: none"> • Sufficient space to maintain comfortable standing position and balance, and allow for full range of head motion without contacting ceiling or overhead structures. and • Sufficient space for the foal to suckle and lie down. 	Floor space 1.4m ² in addition to the space allowance for the mother Height from floor to ceiling of any overhead structures - 1.5 times the height of the mother's withers
Mare in last four weeks of pregnancy or that has given birth within last seven days	<ul style="list-style-type: none"> • Sufficient space to maintain comfortable standing position 	Floor space 2.4m ² per animal.

	<p>and balance, and allow for full range of head motion without contacting ceiling or overhead structures.</p> <p>and</p> <ul style="list-style-type: none">• sufficient space to lie down <p>and</p> <ul style="list-style-type: none">• any additional space recommended by a veterinarian.	<p>Height of stall 1.5 times the height of the mare's withers.</p>
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SUBMISSION ENDS