EMHF

European & Mediterranean

Horseracing Federation

**SUBMISSION ON BEHALF OF THE EUROPEAN HORSERACING SECTOR**

**to the**

 **EUROPEAN COMMISSION**

**for its**

**FITNESS CHECK AND IMPACT ASSESSMENT OF LEGISLATION RELATING TO**

 **ANIMAL WELFARE IN TRANSPORT**

The **European and Mediterranean Horseracing Federation** [www.euromedracing.eu](http://www.euromedracing.eu)

represents and promotes Thoroughbred horseracing across the region, working to uphold its integrity and to develop close and productive relations between the sport's governing bodies which make up its membership. The EMHF comprises 24 Full and 2 Associate Member countries, of which 17 are EU Member States.

This letter carries the support of the following organisations, which are all fellow members of the European Horse Network:

**Animal Transortation Association,** <https://www.animaltransportationassociation.org/>

the non-profit association dedicated to the safe and humane transportation of animals worldwide.

**Union Europeene du Trot**, <https://www.uet-trot.eu/fr/> which was established in 1973 to promote the integrity and prestige of Trot Racing, breeding and betting across the region and comprises 21 member countries.

**European Federation of Thoroughbred Breeders’ Associations**, <https://www.eftba.eu/>

which was set up in 1994 to enable European breeders’ associations to be represented at a European level with a strong single voice and represents the majority of European Thoroughbred breeding countries.

**European Trainers Federation,** which represents the interests of all twelve member associations of racehorse trainers in Europe.

**European and African Stud Book Committee**, which comprises the 35 Thoroughbred Stud Books in the region.

**European Equestrian Federation,** <http://www.euroequestrian.eu/eef/about-eef>.

which was founded in 2009 with the aim of addressing the issues of the equestrian sports sector at a European level. Formally established in February 2010 with the adhesion of 27 National Federations (NF), the EEF began to work with the International Equestrian Federation (FEI) to increase the influence of European nations within the FEI. The EEF currently includes and represents 38 European National Federations.

This report has been put together to aid information for the ongoing European Commission review of animal welfare and also in response to the recent European Parliament report recommendations into Animal Welfare in Transport.

As a key principle, we wish to demonstrate the already high independent industry regulation and health and welfare standards in place within the European Thoroughbred (and sport horse) sectors, and evidence that continued and appropriate derogations from any inappropriate or unnecessary legislation aimed primarily at slaughter horses and farm animals are not only proportionate, but also essential.

We believe the single most important action to improve welfare in transport for all horses is for the current rules to be properly and uniformly implemented.

**Sector background**

Horseracing is perhaps the most tightly regulated of all the equine sectors. The reasons are as follows:

- Horseracing is one of the world’s oldest sports which operates on a global level. It is a highly visible and much televised sport. Its future depends upon its maintaining its integrity in terms of betting and also public support in terms of putting the health and welfare of its horses first.

- Due to a percentage of the revenue from betting being returned to the racing sector, there has been the possibility to invest a significant proportion of money into research to improve equine health and welfare.

The impact of horseracing in Europe is estimated at €21.8bn per annum, and 105,000 full-time equivalent jobs. Racehorses travel to thousands of races a year throughout Europe, but also for many other reasons, such as for breeding, to bloodstock auctions, and to and from training.

Flexible movement of horses is essential to the Thoroughbred industry, both for intra EU travel and to third countries, as there is significant movement between EU and non-EU European countries.

It is extremely important for policy-makers to note that all Thoroughbreds must be bred by natural means: artificial insemination is, by international agreement, not allowed, so Thoroughbreds must be able to travel sometimes long distances within Europe and to third countries.

International movements are commonplace - Thoroughbreds make over 20,000 such trips annually between the three principal European racing nations (France, Ireland and Great Britain) alone. The European Thoroughbred racing and breeding sector is the international leader for the export of high-quality racehorses and breeding stock world-wide.

While we recognise the reasoning behind, and fully support, efforts to improve the transport conditions of all animals across and outside of the EU, some of the recommendations proposed by the recent European Parliament report, and also animal welfare organisations, would have significantly negative consequences for, not just the European horseracing sector, but also the wider European sports competition and equestrian leisure sector. These consequences are not just economic - some proposals would actually lead to reduced welfare conditions for travelling racehorses and competition horses.

We fully support the aim to improve transport conditions for export of slaughter horses within the Union and to third countries. However, unlike other species, and in the case of racehorses (and their breeding stock) and sporthorses it is an economic imperative that our horses arrive uninjured and in good condition ready to race, to compete, for sales, or for breeding. It must also be recognised that, unlike the majority of farm and other animals, many non-slaughter horses travel regularly, often with return journeys in a single day.

Our sector is also already highly self-regulated, internationally. Even so, we are not complacent, and the Thoroughbred sector is engaged in ongoing efforts to enhance further the already high standards of equine welfare, through dissemination of best practice guidelines and further research, as well as current work on updating an International Guidance for Thoroughbred Welfare in Transport.

**Self-regulation and guidance within our sector**

EU Thoroughbred Racing Authorities have signed up to The International Agreement on Breeding, Racing and Wagering, which is published by the International Federation of Horseracing Authorities (IFHA) – the EMHF’s global umbrella body - and which brings together a series of Articles, appendices and guidelines, setting out recommended best practice in significant areas of racing, stud book administration and wagering common to all jurisdictions. The purpose of these Articles includes the protection of the safety and welfare of horses and riders.

Training and Education in European countries of stable staff, jockeys and trainers is carried out at a national level in addition to several European Associations which seek to further develop European standards and cooperation. This includes competency in transporting horses.

A key example of how tightly regulated the European Horseracing Sector is, can be found in the requirement for all trainers to be licensed. In France, for example, the Thoroughbred training yard must be approved by France Galop (the Thoroughbred Racing Authority of France) and, when some actions are deemed necessary, the licence is postponed until improvement has been made.

By way of another typical example, in Poland a trainer would have to have completed a course of several months’ practical and theoretical training and have passed an exam, including the rules of racing and practical knowledge related to the nutrition, welfare and training of horses.

Again, as an example, in Ireland and France, where trainers are also licenced, at racecourses at least two veterinarians need to be in attendance at a race meeting, and any neglect, including during transport, would be quickly discovered and penalised.

It should also be noted that all authorised European race meetings are attended by spectators and a very large number are televised – this, in itself, gives a high level of transparency in terms of monitoring racehorse welfare.

The IFHA has a dedicated Welfare Committee as well as a highly regarded International Movement of Horses Committee, composed of international experts and representatives, including a member of the European Commission.

**The recent European Parliament recommendations on transport (ANIT committee)**

We fully support many of the Parliament’s proposals, including:

• Clarification of reasons for travel

• Priority lanes for animals at BCPs

• Enhanced infringement proceedings, standardised and larger fines & blacklisting

• Greater use of IT to corroborate reasons for travel/ID etc.

• More effective checks

We regret that the European Parliament ANIT Committee stage amendment “for competitions and exhibitions”, to the clause on reasons for animal transportation, was dropped from the final text. As all commercial animal transport is covered by 1/2005, we believe it is essential that reasons for transport other than to slaughter and for farming purposes are clearly acknowledged, given that horses travelling for other (commercial) purposes are covered by the EU legislation.

Some other recommendations by the European Parliament report would have negative repercussions for our sector economically and we do not believe they would improve our horses’ welfare. We wish to make some comments on these issues:

- Official veterinary presence at loading/unloading

- Transport times

- The registered horse derogation

- Temperature limits

- Horse box specifications

**Presence of an official veterinarian at loading/unloading**

We fully understand that this proposal has arisen because of the number of slaughter animals which are already injured or are unfit for transport before loading.

But, here there is a significant difference between transport of non-slaughter horses/other livestock and the racehorse and sport horse sectors: with transport of racehorses and sport horses to races, competitions, stud, training or auction, it would simply not make economic sense to spend the money travelling a sick or injured horse to compete, train, be sold at auction or arrive at stud. Years of overwhelming evidence in the data on racehorses which arrive uninjured after transport, in peak condition ready to race, proves that self-regulation in this industry is extremely high. Indeed, by way of illustration, betting-related publications frequently highlight the distance travelled by runners to races – the further travelled the more this is seen as a **good** sign, from a betting perspective, as it demonstrates the trainer’s and owner’s commitment to the race.

Another difference from farm animals and slaughter horses is particularly important for policy-makers to note: many intra-EU and third country journeys by professional horse transport companies for non-slaughter horses involve loading and unloading of individual horses from separate locations.

This significant difference impacts on several proposals, but, in particular, the proposed requirement for an official veterinarian to be present for loading/unloading (even for one horse at a time, where the time of pick-up/drop-off can vary widely).

In fact, given that vet appointments need to be booked in advance at a prescribed time to enable the vet to travel to the horse location (yet horse transporters may arrive early or be delayed to an individual destination) this requirement could actually **lengthen** overall journey times, while waiting for veterinary presence and approval for one horse.

The Animal Transportation Association further point out that time spent by professional drivers (whose driving hours and working times are limited in law) waiting for the arrival of a vet will indeed be included as ‘working time’. Where such delays push these drivers to their daily time limits, they will need to seek additional layover stabling, with consequent further offloading and loading and higher danger of contamination if coming into contact with horses of lower health status.

Furthermore, the additional costs for an individual (or small training yard or breeder) who is not registered as a professional horse transporter would significantly impact on those small businesses operating for racing/sporting and breeding purposes, without providing any welfare benefits to their horses.

It would simply not be in the economic or reputational self-interest of a professional transporter, nor his client to transport an injured horse. It would not be in the self-interest of a trainer or breeder to transport an injured horse to a racecourse, competition event or stud.

In addition, we believe there just are not enough official veterinarians in the EU to cope with this proposed requirement, and this proposal would merely stretch an already overloaded service and prevent these Official Veterinarians from fulfilling more urgent sanitary and welfare actions.

**Transport times**

We believe that an arbitrary time limit on transporting non-slaughter horses would not improve overall welfare in transport for Thoroughbred racehorses and bloodstock, and could threaten their high health status, and/or lead to a reduction in their welfare during transport.

Scientific studies and research in this area frequently note that transport times are far from the only significant welfare variable (Docherty et al, 1997; Riley et al, 2016; Riley et al 2022), with driver competency and methods of driving often being more significant in terms of injuries in transportation (Riley et al, 2016).

A key variable is also whether animals are already accustomed to handling, and transport, as noted by SCAHAW, “If animals have experience of loading and of transport in which conditions are good, they are likely to show much reduced responses to subsequent loading and transport” and also that “Horses which are frequently transported and sheep which have been transported on several occasions show fewer indications of poor welfare” (SCAHAW 2002)

The 2002 SCAHAW report also refers to Tarrant and Grandin (2000) research, stating that “the total journey time is less of a problem than the condition under which the transport takes place”.

More recent studies have corroborated this (Riley, C.B., B.R. Noble, J. Bridges, et al., 2016) who note that ‘scrambling and loss of balance were identified by participants as being associated with more than half of the injuries. Driver experience, training and behaviours are critical to the welfare of transported animals.’ This was echoed in Padalino et al. (2018) who concluded that the experience and knowledge in horse handling of people responsible for moving horses by road was the most important human factor associated with transport-related injuries in equines.

Code of Practices in other countries echo this for equines not destined for slaughter, with that of Western Australia stating clearly, ‘providing care is taken and facilities are of high standard, horses can be transported for long periods without any problem’. This Code recognises the special status of racing and competition horses, ‘ *9.8. It is appreciated that horses used for racing and other purposes may be safely transported from State to State in specially designed floats and under expert standards of horse care and supervision. Horses may be transported for uninterrupted periods in excess of 36 hours and may not be required to be given post-transport spelling period provided that certain criteria are met*.’

Travel is stressful for all animals to different extents. However, there is not a significant amount of scientific evidence available to date to show how soon stress levels return to normal after transport.

In the recent Tadich study (Tadich et al, 2015) weanlings in Chile were transported for 15 hours and, while this resulted in a stress response and dehydration status in the foals studied, ‘*no significant long term muscular damage could be confirmed*’. The author’s post-study conclusion was that ‘*provision of water during transport of foals should be considered in order to prevent health and welfare risks of foals during transport*’.

Further studies have underlined that fitness is an essential component in reducing stress and injury during travel (Colborne et al, 2021), with research also showing that, with a 300km journey and an exercise bout of cantering 1,500 m, similar effects on serum enzymes and metabolic processes were reported in racehorses (*Codazza et al., 1974).*

Therefore,it is essential that the Commission recognises the need to differentiate not only between species of ungulates, but also within the equine population.

**Compulsory rest periods after journeys**

There would also be significant negative consequences for Thoroughbreds from a compulsory 24- or 48-hour minimum rest period before an onward or return journey can be undertaken. Racing and competition horses often make return journeys in a single day – in order to comply with a travel time limit, trainers or stud managers would have to adopt a model where they need a horse to spend as little time ‘resting’ during journeys to ensure that a round trip to racecourse or stud can be completed within the 12-hour window rather than adapting a trip to the individual requirements of the horse(s).

Such constraints could put the current ‘overnighting’ model used by many trainers - travelling the horse to the racecourse or equestrian sports event the day before a race or competition to stay overnight to ensure that preparation is not interrupted by a long journey just before a race - under threat.

A compulsory rest period could further restrict the horse’s health and welfare after a race by obliging a horse to stay in racehorse stabling for an unnecessary length of time, rather than returning to their habitual residence. It would also have disastrous negative consequences for racecourses and training businesses. For multi-day meetings there are simply not enough stables, or exercising facilities, at the racecourse or event location for all horses to stay 24/48 hours before and after competing.

The points noted above would also be relevant to the breeding sector and “walk-in” mares (where the mare is transported to the stallion but is not then returned home).

Scientific studies have shown that individual equine responses vary significantly in terms of their stress during travel (Kusano et al, 2016), and it is for this reason that we are convinced that the continued flexibility to allow horse professionals to decide how long to travel their individual horse or consignment is crucial.

**Temperature limits**

We have particular concerns about the European Parliament’s proposed ban on authorising transport journeys if the temperature outside during the journey is predicted to fall outside the range 5°C – 30°C. A blanket ban on transport outside of these parameters would have devastating consequences for the horseracing sector and local economies in some EU member states.

Horses are very efficient in regulating their body heat, compared with other farm species. Marlin in the 1996 study concluded that, ‘Horses have a wide thermal tolerance, particularly tolerating cold well’.

Horses are frequently competed, exercised and travelled in cold temperatures, particularly in EU Eastern European and Northern European countries. They are also unique among ungulates in that they are often also blanketed for transport in order to maintain body heat.

Just one EU winter example is the Swedish racetrack of Bro Park, near Stockholm. Taking 2021 temperatures, between January and March, these ranged from -1°C to -13°C on every single one of these winter race dates. Under the European Parliament’s proposals this racetrack simply could not operate, as horses would be unable to travel to the racetrack.

And, while not in the EU, neighbouring Switzerland, known for its high standard of animal welfare, has held the world-famous annual St Moritz horse races on the frozen lake since 1907.

Similar problems with the European Parliament proposal would be encountered in Southern countries in hotter weather, where race meetings and equestrian events are often held in temperatures exceeding 30 degrees.

For example, the historic beach race meeting in Sanlucar de Barrameda in Spain has taken place since 1845 during low tide in August, and is attended by more than 20,000 spectators. August highs there during the day can reach 35°C during the day, with historical averages at 30° for every single day in that month (Accuweather.com)

Horse racing also takes place in Cyprus at the track in Nicosia all year round. Historical averages for the month of August are between 34° and 35°C, but historically there have been temperatures recorded over 30°C even in the months of March and November.

**Space allowances**

We disagree with using allometric principles as a basis for future space allowance calculations when it comes to travelling racehorses and sporthorses. This is because racehorses/sport horse are best travelled without too much room, to prevent them from moving around too much. With Thoroughbreds travelling in separate partitions of a horsebox, some horses use the side of those partitions to help them balance during the journey. A horse’s centre of balance is much higher than some of the other farm animals listed within the consultation document, so restricting the area that they have, within reason, makes for safer travelling.

**Partitions**

We believe the European Parliament recommendation to “ensure that there are no gaps between the floor or vehicle wall and the partitions in transport vehicles” is badly drafted and would unnecessarily outlaw many horse trailers and lorry specifications who often have a rigid semi partition between horses, with rubber sheeting below, and the vast majority of horse vehicles have gaps below the horse’s head in herringbone pattern to enable personnel to travel between stalls.

**Proposals by animal welfare organisations**

We support many of the proposals by welfare groups, but some of their proposals would have disastrous effects on our sector, without a significant benefit in welfare for our horse sector, and in some cases would bring negative welfare outcomes.

**24h rest stop before/after ferry journeys**

For example, in 2019, Irish trained horses ran 1559 times in the UK. A compulsory rest period of 24 hours at or near the port after the sea-leg could have significantly negative welfare and health consequences for these equine athletes. It would also not be feasible to provide adequate exercise facilities for racehorses/sport horses at these ports. These compulsory ‘rest’ periods would simply extend overall travel time unnecessarily.

In addition, unlike transport for slaughter, there are also significant fluctuations in the numbers of racehorses and breeding stock and equestrian sports horses, at certain times, which would make provision of stabling facilities at, or near, ports infeasible at peak times. Just one example is the annual Cheltenham race meeting. At the 2020 Cheltenham festival there were 181 Irish trained runners who made the journey over the Irish Sea. There was a high proportion of winners among those horses which travelled long distance from Ireland, with 23 Irish horses winning over 2.8 million euros in prize money, which also demonstrates that these horses must have arrived in excellent condition. For their return – imposing a long rest period for a horse at or near Dublin port rather than returning to their home stable, often just an hour or two away, does not make sense from their welfare or sanitary health perspective.

There are also significant numbers of Thoroughbreds travelling to and from Ireland and the European continent – imposing a compulsory rest both before and after a ferry journey would negatively impact a racehorse’s health and welfare and could even be adding at least 4 full days’ delay between Ireland and France. This proposal would also threaten these horses’ high health status, if they are having to be held in port or nearby facilities, by mixing with consignments in general stabling facilities.

**Compulsory temperature controls**

The Animal Transporters’ Association report that the cost of retrofitting an individual horse transporter in order to install temperature controls would be in the region of £20,000 per vehicle, which, if applied to all EU countries, would impose significant and totally unnecessary costs on racehorse and sport horse trainers and transporters in northern and temperate member states such as Ireland or Sweden.

The same reasoning applies to the proposal by some animal welfare organisations such as Eurogroup for Animals, who demand that all vehicles used for the transport of animals must have a ventilation system and at least one electric roof fan in place that operates from an independent power source.

The Animal Transportation Association have also cast doubt on the benefits of introducing air-conditioning into horse boxes, believing it to be beneficial to keep horses in their natural environment, experiencing all four seasons and with a wide temperature spectrum. They point out that the climate on board a moving vehicle will, due to ventilation systems, invariably be better than that in the horse’s stable.

**Travelling of pregnant mares, foals and weanlings**

Recent research (Tadich, 2015) travelling 15 weanlings in Chile 15 hours resulted in a stress response and dehydration status in the foals studied but no long-term muscular damage was confirmed. Recommendations were for the provision of water during transport of weanlings should be considered in order to prevent health and welfare risks during long-distance transport.

We believe that much more research would have to be done with horses, and, in particular, well-handled, healthy Thoroughbreds and sport horses, before an arbitrary time limit or ban on movement is legislated.

**The registered horse derogations**

We recognise that the derogations for Registered horses are considered too wide by animal welfare organisations. However, they were put in place, and accepted, for good reasons. It is essential that any discussions with the European Commission and other stakeholders as to how these may possibly be replaced by alternative legislation in any revision of Regulation 1/2005, include our sector and the sports horse sector.

Of course, we completely support stringent welfare in transport conditions for horses for slaughter, whether it be Thoroughbreds at a certain stage of their life, sport horses or other breeds.

But for our sector to continue to operate any changes to the registered horse derogation **must** include Thoroughbred horses destined also to and from auction/sale and for breeding, and not just for racing and competition.

There is no conclusive scientific evidence that Thoroughbreds have a higher incidence of respiratory or other issues during travel than other breeds. In Padalino’s Australian study, 97% of horses arrived safely, and there were 11 cases out of 1650 of respiratory disease or pneumonia, with Padalino concluding*, “No significant effect of sex, age, or breed in the development of transport diseases was found, suggesting that individual horse variability and past experience might be more important in influencing the ability of the horse to cope with the transport event* (Fazio et al., 2013b).”

While World Horse Welfare uses Padalino research in their own submission to the Commission on revising 1/2005 stating that, ‘*Thoroughbreds are more likely to experience respiratory disease’*, we also note their statement in the same document that there is, ‘*limited scientific research on how different breeds and types of equine react to being transported’*.

We do not believe any changes to registered horse derogations replace the overriding need to raise enforcement standards, introduce more effective spot-checks, and target those transport routes and operators who are suspected of or known for transport violations.

With regard to clarification of reasons for travel and enhanced supporting documentation, we fully support the calls for enhanced spot-checks within Member States and at BCPs. All legitimate transporters of Thoroughbreds, whether on intra-EU or third countries journeys, should be able to carry and easily produce evidence of a) accepted entry into a recognised race; b) accepted nomination to a Thoroughbred stallion for breeding mares (or return from stud for mares and their foals) or c) accepted entry into a sales catalogue from a recognised bloodstock sales house d) bill of private sale with details of old and new owner and keeper.

Registered horses are currently exempt from the requirement for journey logs. For all travelling horses to have to apply to the national competent authority for journey log authorisation for races, equestrian competitions, breeding, and bloodstock auctions would have a negligible effect on horse welfare standards while adding extra costs and delays for sector operators. If this derogation for all journeys were removed then the pressure on national authorities to authorise the hundreds of thousands of journeys of horse riders to competitions throughout Europe would be a major burden on both those stakeholders and the national authorities.

Likewise, a proposal for a 4-hour journey limit for ‘basic vehicles’ would mean local small equestrian businesses, particularly in rural and outlying regions, would find it impossible to transport their own horses to many competitions and sales, because of the prohibitive cost of outfitting their own vehicle.

Finally, the recommendation that equines should be given constant and free access to forage and clean water on arrival and for the duration of their stay is not in the health and welfare interest of a competition or racehorse who will often have specific dietary and intake requirements (or exclusions) before or after competing.

The European and Mediterranean Horseracing Federation, together with the other organisations supporting this submission, hopes that the European Commission finds the above points useful to its deliberations and offers any further assistance or clarification that the Commission might want.

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