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5 April 2019

**Dr Jane Thomson**  
**Committee Secretary**  
**Senate Rural and Regional Affairs and Transport References Committee**  
PO Box 6100  
Parliament House  
Canberra ACT 2600

**By email only:** [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

Dear Dr Thomson,

**Re: Inquiry into the feasibility of a national horse traceability register for all horses**

On behalf of Animal Medicines Australia, I write to provide our submission to the Inquiry into the feasibility of a national horse traceability register.

AMA is the peak body representing the leading animal health companies in Australia. AMA member companies are innovators, manufacturers, formulators and registrants of a broad range of veterinary medicine products that prevent, control and cure disease across the companion animal, livestock and equine sectors.

AMA supports the creation of a national horse traceability register as it could provide a framework to improve health and welfare outcomes for Australian horses through:

1. improved biosecurity and emergency disease control,
2. the creation of individual equine health records, and
3. a more appropriate mechanism to collect the Horse Disease Response Levy.

We are pleased to provide the following comments for consideration by the RRAT Committee and look forward to further consultation on this issue.

Yours Sincerely,

Ben Stapley  
Executive Director

# **Inquiry into the Feasibility of a National Horse Traceability Register for All Horses**

5 April 2019



**Animal  
Medicines**  
Australia

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## Introduction

**Animal Medicines Australia (AMA) is the peak body representing the leading animal health companies in Australia. AMA member companies are the innovators, manufacturers, formulators and registrants of a broad range of veterinary medicine products that prevent, control and cure disease across the companion animal, livestock and equine sectors.**

In the Australian livestock sector, AMA member company products increase farm productivity, deliver improved health, welfare, safety and environmental outcomes, and underpin the quality and safety of Australian livestock products for local consumption and export. In the companion animal sector, veterinary medicines produced by AMA member companies facilitate longer and better quality partnerships between humans and their animals.

AMA supports the creation of a national horse register as it could provide a framework to improve health and welfare outcomes for Australian horses through:

1. improved biosecurity and emergency disease control,
2. the creation of individual equine health records, and
3. a more appropriate mechanism to collect the Horse Disease Response Levy.

### 1. Improved biosecurity and emergency disease control

Knowledge of the location and movement of horses would be a valuable addition to Australia's emergency preparedness, biosecurity and animal disease response capabilities. For example, a unique identifier that links each horse to their owner and place of residence would assist in the rapid identification and return of displaced horses to their owners following a natural disaster or evacuation.

A national horse register would also provide invaluable assistance in responding to outbreaks of disease. The 2007-08 outbreak of equine influenza (EI) provides a salient example of the costs of a single equine disease outbreak in two states (New South Wales and Queensland).

The EI outbreak caused unprecedented economic loss and disruption to Australia's equine industries, with the direct costs of the emergency response conservatively estimated to be in excess of \$360million.<sup>1</sup> This estimate did not include the indirect economic, social and emotional costs to horse owners associated with the death or illness of their horses, disruption to business and recreational activities, strict movement restrictions and other biosecurity measures, and participation in disease tracing and surveillance activities.

Restrictions on the movement of horses persisted for more than 6 months, causing significant economic and social disruption for professional and recreational equestrian sports, horse racing and veterinary professions that depend on freedom of movement to ride, compete, race, train, treat and carry out other routine equine activities. These impacts were felt in both infected and uninfected regions, with increased state border controls across the country to prevent the spread of disease and the secondment of key staff to the infected areas.

One of the issues highlighted during the outbreak was a lack of knowledge on how many horses resided in, and the movement of horses into and out of, high risk areas. This made it difficult for responding authorities to track the spread of disease and quickly identify at-risk populations. As a

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<sup>1</sup> R Hoare (2011). 'Overview of the industry and social impacts of the 2007 Australian equine influenza outbreak', *Australian Veterinary Journal*, v89 (suppl.1), p147-151.

result, two mandatory electronic tracking systems (horse event registration (HER) and travelling horse statements (THS)) were set up to identify congregations of horses (any event gathering 10 or more horses, or any number of horses from 3 or more properties) and movements of horses during the outbreak. Any person organising a horse event or moving a horse was required to register the details with the NSW Department of Primary Industries through a designated webpage or call centre. These tracing systems were later deactivated following the end of the outbreak.

Analysis of the HER and THS data confirmed the highly mobile nature of the equine industries, which helped to explain the rapid and widespread dispersal of the disease before movement restrictions were imposed. The HER and THS systems also facilitated the progressive relaxation of movement restrictions as the outbreak was brought under control, whilst retaining the ability to trace large numbers of horses quickly if needed.

It was later noted that the tracing of individual animals was significantly compromised by incomplete or invalid addresses, such as the failure to record a destination address in travelling horse statements. Direct linkage of HER and THS data to mapping systems, such as property identification codes, would have been a significant enhancement.

Whilst each state or territory is responsible for disease surveillance and control within its borders, responses to a disease outbreak are managed under the Government and Livestock Industry Cost Sharing Deed in Respect of Emergency Animal Diseases (or *Emergency Animal Disease Response Agreement, EADRA*), which is a pre-existing agreement between the affected industry and government to share the costs of approved disease eradication activities.

A national horse register would assist Australian states and territories to respond more efficiently and effectively to a future equine disease outbreak, thus reducing the overall cost to the commonwealth and, in turn, the amount payable by the equine industry. As highlighted in the EI outbreak, a database of all horses in a region would be valuable for identifying the most effective points to implement quarantine and movement restrictions, and to identify the resources required to isolate affected properties and animals. This would help to protect the equine industry from another major exotic disease event (like EI) in the future and contribute to maintaining a robust biosecurity framework to protect all Australians.

## 2. Creation of individual equine health records

A national horse register could significantly improve equine health and welfare if key health information was linked with the registration of each horse. An individual health record associated with the microchip (or other unique identifier) of each horse could be used to create an enduring record of important health information over the lifetime of that horse. Accurate health records support good equine health, which is fundamental to high standards of animal welfare, as well as protecting human health from zoonotic disease.

Vaccines are critically important medicines used to protect the health of both horses and humans. An electronic health record could provide up-to-date information on the vaccination status of horses for a number of diseases that are transmissible to humans. This would facilitate the prompt treatment of sick horses, whilst also protecting the health of people handling those horses, especially when a horse may not display obvious symptoms of infection.

For example, Hendra virus is commonly fatal to both horses and humans. Extreme precautions must be taken when handling infected horses to prevent owners and veterinarians, as well as other horses,

from becoming infected. The risk to human health is so great that in some areas, veterinarians may legally refuse to examine or treat a horse that has not been vaccinated, and/or is displaying Hendra-like symptoms. Many horse owners in Australia also routinely vaccinate horses against tetanus and strangles (*Streptococcus equi*), which can pose serious health risks to humans. Other vaccinations (including rotavirus, salmonella, equine herpes viruses and equine influenza) are commonly used in contexts where horses frequently mix with other horses, such as at riding clubs, race meetings, equestrian sport events, agistment properties, breeding facilities, training venues, during transport and quarantine, and at sale yards.

Many vaccinations require booster shots at specific intervals to maintain immunity to these debilitating diseases. An electronic health record could improve equine health by recording the dates of each vaccination given, and digital alerts if-and-when booster shots are required would provide even greater health and welfare benefits.

Similarly, individual health records would support integrated parasite management (IPM) programs, which seek to control parasites in an animal population by integrating chemical (parasiticides) and non-chemical (nutrition and pasture management) methods. Effective parasite control is especially important for breeding stock and young horses (which have immature immune responses), for horses that mix with other horses (such as racing and sport horses), and on agistment properties. Individual health records would support IPM by documenting the type, date and dose of parasite treatments given to each horse to reduce unnecessary parasiticide use, improve pasture management techniques and thereby slow the development of parasite resistance.

Health records could also support equine welfare by ensuring that a comprehensive medical history is permanently linked to the individual animal, regardless of changes in ownership, location or purpose over its lifetime. Further, in an emergency, a treating veterinarian could quickly obtain access to that horse's medical history, especially when their regular veterinarian is unavailable. There is also the potential for horses who have been the subject of welfare investigations to be permanently identified so that they can be monitored for associated health issues in the future.

### 3. A more appropriate mechanism to collect Horse Disease Response Levy

A national horse register would provide an alternative mechanism to collect the Horse Disease Response Levy (HDRL), which is currently imposed on the manufacturers of equine worming products and stock feeds.

When an animal disease outbreak occurs, commonwealth funds are used to treat affected animals and stop the spread of the disease. The HDRL is nil-rated, meaning that it is only payable following a response to an exotic equine disease declared under the EADRA agreement. The levy is activated following the disease outbreak, and once the costs have been recovered, the levy reverts back to nil.

Principle 6 of the Australian government policy on the management of levies within primary industries states that any levy '*must be equitable between levy payers*'.<sup>2</sup> The current arrangement is not equitable, as horse owners can bypass the levy payment by not worming their horses, obtaining worming products from unregulated overseas sources or using products that have not been tested for safety or efficacy on horses. These actions bypass the levy payment imposed on worming products

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<sup>2</sup> Commonwealth of Australia (2007). 'Levy Principles and Guidelines (January 2009)'. Available at <http://www.agriculture.gov.au/SiteCollectionDocuments/ag-food/levies/documentsandreports/levy-principles-guidelines.pdf>

and pose significant threats to horse health and welfare. In addition, horse owners may also choose to stop purchasing manufactured feed, or to purchase bulk grain to mix stock feed themselves, thus by-passing the levy payment imposed on stock feeds.

A national horse register would provide a more equitable mechanism to collect the HDRL (if activated) in the future. If the HDRL levy was administered through a national point of registration, then all horse owners would be contributing to the commonwealth costs incurred in the treatment and protection of their horses, irrespective of their need or choice to use particular products.

In addition, a levy imposed at a national point of registration would apply to the largest possible proportion of horse owners. Cost sharing across the broadest possible base reduces the levy burden imposed on individual horse owners, thus representing a fairer and more equitable approach to recovering the costs of an outbreak response.

## Summary

AMA supports the establishment of a national horse register as it could provide a framework to improve health and welfare outcomes for Australian horses. Firstly, a horse register would strengthen national and regional biosecurity, and support efficient and effective emergency responses to disease outbreaks. Secondly, there are substantial health and welfare benefits possible with the creation of an electronic health record linked to the unique identifier of each registered horse. Lastly, a national registration system would provide a more equitable collection point for the Horse Disease Response Levy, if-and-when it is required in the future.

AMA notes that a number of registers already exist for both horse racing codes, as well as many equestrian disciplines, special interest groups, riding clubs and stud books. Many of the benefits of a national horse register rely on the use of a unique identifier for each animal to facilitate traceability, with a single record held for each individual horse. There is significant work still to be done to ensure that a national horse register will unify (rather than duplicate) these existing registers, as well as expand to capture horses that are not currently recorded on these (and other) registers.

It is also critical that any national register is fully implemented in a co-ordinated manner across all states and territories in order to maximise its coverage, currency and utility.

If a national horse register is to be created, there must be further consultation with stakeholders to determine its content, structure, implementation and operation, to ensure that it effectively addresses the diverse needs of the equine industry.

AMA therefore supports this inquiry into the feasibility of a national horse register and looks forward to further consultation on this issue.