

**Submission from RSPCA Tasmania****Re: Code of Practice for Racehorse Welfare – Section 6: Accommodation and Protection from Weather Extremes****To: Sean Carroll, Tasmanian Racing Integrity Commissioner****Date: 10/04/2025**

Thank you for the opportunity to comment on the early assessment of the *Code of Practice for Racehorse Welfare*, particularly Section 6: *Accommodation and Protection from Weather Extremes*.

As Tasmania's leading animal welfare organisation, the RSPCA welcomes the intent behind the Code to formalise standards for the care and protection of racehorses. Our submission is made in our capacity as **advocates** for improved animal welfare legislation and regulation, not as enforcers of the **Animal Welfare Act 1993**. It reflects both our scientific understanding of horse welfare and the values of the Tasmanian community.

Recent community research conducted by Verian (Q2 FY24-25) shows that **62% of respondents** support **stronger animal welfare protections in animal racing**. This indicates a growing expectation for transparency, accountability, and reform in this industry sector.

We note and support the Commissioner's rationale for initiating this early assessment:

*"...the animal welfare systems and processes it [the Code] codifies meet contemporary community expectations as related to animal accommodation and protection from weather extremes."*

Our feedback on Section 6 is as follows:

**1. Access to Shade and Shelter – Minimum Standard S6.1(c)**

The requirement that each horse be provided with "*proper and sufficient shade, shelter and other reasonable protection from the elements*" is vital. Horses in Australia, including Tasmania, experience significant periods of UV exposure and temperature extremes. In such conditions, **shade is not optional—it is a necessity** for the physical and mental wellbeing of horses.

Scientific evidence supports this:

- Horses can **overheat** due to their large body mass and inefficient thermoregulation.
- Horses with white facial markings are susceptible to **sunburn**.
- Horses have **evolved to seek shade and companionship**, especially during hot or inclement weather.

- A high-fibre diet, typical in racehorse management, **produces internal heat**, compounding heat stress.
- Horseflies prefer sunlit areas, so lack of shade increases fly-related stress and discomfort.

Additionally, the **design of shade structures** should be functional and consider social dynamics, preventing lower-ranked horses from being excluded. Shade should be **natural (trees, hedges)** or **constructed (open-sided shelters)** and sized appropriately to accommodate multiple horses simultaneously without risk of injury from crowding or bullying.

We support the requirement that rugs not be used as substitutes for shade. Lightweight rugs **do not lower body temperature** and may, in fact, contribute to overheating.

## 2. Stabling and Confinement – Minimum Standard S6.2 & Guideline G6.3

We acknowledge that stabling may be necessary at times (e.g., under veterinary direction), but we are concerned by any practice of **routine full-time stabling**, which fails to meet the full spectrum of behavioural, social, and physical needs of horses.

RSPCA Australia's position is that:

- **Stabling should be temporary**, not the primary or sole housing arrangement.
- Horses should have **daily access to pasture** and **social interaction** with other horses.
- Provision of **roughage, visual contact**, and **environmental enrichment** is essential to prevent **stereotypic behaviours**, such as weaving, cribbing, and box walking, all of which are signs of stress and frustration [1,4,6].

Where stables are used, they must adhere to the specifications in S6.2, and care must be taken to:

- Provide **natural light and ventilation** (G6.2),
- Allow for **safe movement and lying posture**, and
- Use **dust-minimising bedding** that is replaced regularly (G6.5).

Horses kept in stables should never be socially isolated. Social interaction with conspecifics is essential for mental wellbeing and behavioural development [1,3,4].

## 3. Stocking Density and Paddock Management – Guideline G6.1 and Notes

We support the guideline recommendation of **1 hectare per grazing horse** in temperate, fertilised pastures. Overstocking not only causes **welfare issues (bullying, injury, parasite load)** but also contributes to **land degradation**, undermining long-term sustainability.

Racehorses in work may require supplementary feeding, but this does not negate the need for access to pasture, shade, shelter, and social contact. **Paddock rotation**, environmental enrichment, and careful **group management** (S6.1[d]) are key tools to meet both welfare needs and land care responsibilities.

#### 4. RSPCA Enforcement Role and Complaint Pathways

For clarity, we note that RSPCA Tasmania investigates breaches of the **Animal Welfare Act 1993**, including those involving racehorses. Notifications may come from members of the public, racing stewards, or other agencies. We assess such complaints for *reasonable belief* to support the use of our entry powers and the development of a prosecutable case.

Reports of suspected non-compliance with animal welfare standards can be made to:

 [reportit@rspcatas.org.au](mailto:reportit@rspcatas.org.au)

We encourage industry participants, regulators, and the public to use this channel where appropriate.

RSPCA Tasmania supports the minimum standards and guidelines outlined in Section 6 of the Code as a **baseline for acceptable welfare**. However, we urge Tasracing and the Commission to:

- Promote ongoing education for racehorse owners and trainers on horse behaviour and welfare,
- Monitor actual housing and shelter conditions through **regular, independent inspection**, and
- Ensure that enforcement provisions and penalties are clearly communicated and resourced.

Racehorses are elite athletes. Their welfare must be safeguarded through practices that reflect current scientific understanding and align with community expectations.

We thank you again for the opportunity to contribute to this important process.



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#### References

- (1.1) Verian Brand Tracking Research FY 2024-25 Quarter 2 (July - December 2024) Summary Report. Base: All respondents – Q2 (n=610)
- [1] McGreevy P (2012) *Equine Behavior – a guide for veterinarians and equine scientists*. 2nd ed. Elsevier.
- [4] Yarnell K, Hall C, Royle C, Walker SL (2015) *Physiology & Behavior* 143:51–7.
- [6] Rochais C, Henry S, Hausberger M (2018) *Applied Animal Behaviour Science* 198:52–9.

RSPCA Knowledge Base