

Written evidence submitted by the British Horseracing Authority (MaaB0056)

House of Commons Environment, Food and Rural Affairs Select Committee

Moving Animals Across Borders Inquiry – Call for Evidence – March 2021

British thoroughbred racing and breeding industry response

Executive Summary

- The British thoroughbred racing and breeding industry sits at the pinnacle of a highly competitive, yet interdependent, international industry in which thoroughbred movements play a key role
- The UK-EU *Trade and Co-Operation Agreement* and the restrictions imposed during the Covid-19 pandemic have resulted in a significant reduction in thoroughbred movements in the short-term
- In the longer term, the transportation of thoroughbreds will be impacted by the burdensome implementation processes of Sanitary and Phytosanitary (SPS) controls and inefficient border systems on both the UK and EU sides
- Our sector has worked closely with the UK Government, European counterparts and other equestrian disciplines on digital solutions to facilitate continued thoroughbred movement
- These solutions are underpinned by high standards of equine health and welfare and can be implemented in the months and years ahead utilising the provisions of the recent *Trade and Co-Operation Agreement*
- Nonetheless, the principle of *reciprocation* in any new arrangements is fundamental, with the UK Government prepared to act, if necessary, to support the British thoroughbred industry in the event of commercial and animal health and welfare disparities
- We have been working proactively as part of a European Industry taskforce on the Animal Health Law outlining sustainable solutions which do not damage the valuable ecosystem of European thoroughbred racing and breeding and which raise equine health and welfare standards. This taskforce is urgently seeking clarification on the

The British thoroughbred racing and breeding industry is delighted to respond to this important inquiry being undertaken by the Environment, Food and Rural Affairs Select Committee on the movement of animals across borders.

British thoroughbred racing and breeding sits at the pinnacle of the highly competitive international industry, as home to many of the world's top races, stallions and training yards, as well as acting as a unique asset for the UK globally. British racing is the UK's second largest sport, behind football, in respect of attendances, employment and revenues generated annually.

This translates into a significant economic benefit for the UK, with our industry generating **£4.1 billion** in direct, indirect and associated expenditure annually and over **£300 million** in taxation annually for the Exchequer. The thoroughbred breeding industry alone generates a **£427 million** annual contribution to the British rural economy.¹ Much of this is focused in rural areas with over **20,000** people directly employed across our **59** licensed racecourses, hundreds of training yards and thousands of breeding operations – all of which play a key role in the lives of the many hundreds of rural communities they operate in.

The thoroughbred industry across Europe and more widely is fully integrated across the continent with essential interdependencies – including a common Stud Book between Ireland and Great Britain, and harmonised Rules of Racing. It forms a keystone in the wider racing, breeding and equestrian industry in Europe, which is worth over **€52 billion** annually, which supports over **210,000** jobs. Underpinning this is the movement of thoroughbred horse for sale,

¹ Thoroughbred Breeders Association, *The contribution of thoroughbred breeding to the UK economy*, September 2018

breeding and racing, and with around **26,000** thoroughbred movements in and out of the UK each year.²

Our analysis has found a **67%** reduction in British runners in the EU in the period to the end of February (compared to a **23%** reduction in British runners to the rest of the world), while thoroughbred breeding notifications for temporary export in the same period have reduced by **61%**. There is a range of reasons for this including advanced movements in 2020 ahead of the new UK-EU trading arrangements taking effect, transition to new procedures and Covid-19 restrictions. However, the principal long-term issue is the burdensome implementation processes of Sanitary and Phytosanitary (SPS) controls, with inconsistent application by EU Border Control Posts, alongside EU and UK border systems being paper-driven, inefficient, slow, resource heavy, expensive and environmentally unfriendly, with little focus on sanitary and welfare assessment.

In the longer term, we believe these can be resolved through use of industry-led digital solutions – many of which already exist – across the continent, underpinned by the High Health Status of thoroughbreds. If these cannot be addressed, there will be major implications for the balance of trade in thoroughbreds between the UK and EU which the UK Government may need to take further steps to address.

This response is being submitted by the Thoroughbred Industries Brexit Steering Group, which is responsible for the strategic coordination of United Kingdom (UK) and international activities arising from the UK's withdrawal from the European Union. The group includes representatives of the:

- British Horseracing Authority (BHA) – Governing and regulatory body for thoroughbred horseracing in Great Britain
- Thoroughbred Breeders Association (TBA) – Representative body for British thoroughbred breeders
- Weatherbys – General Stud Book for Great Britain and Ireland
- National Trainers Federation (NTF) – Representative body for British thoroughbred racehorse trainers
- Racehorse Owners Association (ROA) – Representative body for British thoroughbred racehorse owners

The thoroughbred industry has also provided input to the submission of the British Horse Council to this inquiry on behalf of the wider equestrian sector, with this submission providing additional context on the thoroughbred sector.

We would be delighted to provide further information and evidence to the Select Committee to support the important work of this Inquiry as it requires.

Important background information

The movement of thoroughbreds underpinned by animal health and welfare

The existing system for moving thoroughbred racing and breeding horses, as well as for other high-level equestrian competition, has successfully evolved over **50** years – regardless of the wider political and economic partnership arrangements between the UK and European Union – and has consistently ensured the highest standards of biosecurity, welfare and equine health. For example, the Tripartite Agreement – which facilitated expedited movement of over **26,000** thoroughbreds annually for racing, breeding, in-training or moving to a sale purposes – was first agreed by the Chief Veterinary Officers of the UK, Ireland and France prior to either the UK's or Ireland's accession to the then Common Market, before being incorporated under EU legislation.

What matters most, regardless of the changes to the UK and EU's wider political and economic relationship as now enshrined by the *UK-EU Trade and Co-operation Agreement*, is that

² Home Affairs Select Committee Consultation – February 2021 Post-Transition management of the border British Horseracing Authority Response

expedited movement of thoroughbreds can continue. Over **80%** of annual cross border movements of thoroughbreds are for breeding purposes, where the use of natural service is mandatory under global agreement. Such thoroughbreds must be of a permanent high health and welfare status to allow such movement, to prevent disruption to racing, competition and breeding and to protect the high value of these horses.

The British thoroughbred industry's approach to withdrawal from the EU

Accordingly, aligned to our industry's commitments to enhance thoroughbred health and welfare standards alongside the importance of international trade, the British thoroughbred industries Brexit Steering Group has throughout the past four-and-a-half years pursued three key objectives:

1. Maintenance of the free movement of the Thoroughbred horse across Europe
2. Ensure there are common movement, transport, health, welfare, Zootechnical and equine ID policies across Europe to the highest standards
3. As far as possible, ensure the free movement of people working within the Thoroughbred industry

The thoroughbred industry has welcomed the significant and proactive engagement by Ministers and Officials at the Department for the Environment, Food and Rural Affairs (Defra) throughout the last four-and-a-half years on the implications for the sector of the UK's withdrawal from the EU. This has involved weekly meetings between representatives of the thoroughbred industry, alongside the wider equestrian sector, and working with officials on developing solutions to facilitate continued thoroughbred movements.

Throughout this time, with Defra's support, the industry has worked closely with fellow European thoroughbred racing and breeding jurisdictions on solutions to facilitate continued thoroughbred movement underpinned by high standards of equine health and welfare – as has been the case for many decades. We firmly believe in, and continue to actively represent for, solutions underpinned by digital technology which work for both sides in our new UK-EU trading relationship.

This dialogue and offers of European industry facilitated solutions have been conducted at the highest level with direct contacts at EU President, Commissioner and Negotiation team level.

Nonetheless, the British thoroughbred industry also believes that the principle of *reciprocation* in any new arrangements is fundamental. It must be the case that, if measures are enacted in the EU which limit the ability for British thoroughbred trainers, breeders, owners and racecourses to compete on a level playing field with European counterparts, the UK Government acts to support the British thoroughbred racing and breeding industry in response and to prevent a commercial and animal health and welfare disparity.

Overall, however, we retain our clear commitment to international competition, and believe that there are eminently achievable solutions built on high animal health and welfare standards, available in the months and years ahead utilising the provisions of the recent Trade and Co-operation agreement.

The UK-EU Trade and Co-operation agreement – The way forward

The British thoroughbred industry welcomed the agreement in principle of the *UK-EU Trade and Co-operation Agreement* in December 2020, alongside the UK's listing as a Third Country for Animal Health purposes and recognition of the General Stud Book by the EU. The industry did, however, warn in advance of the UK's withdrawal from the EU on 1 January 2021 that movements in the first fortnight of the year should be avoided to allow new customs and regulatory processes to be established, while we also encouraged those moving thoroughbreds to engage the services of a professional shipper, transporter and customs agent as required.

It is undoubtedly the case that, in the initial months since the agreement, there has been additional trade friction, bureaucracy and costs involved in thoroughbred movement to the EU

since 1 January 2021. While the challenges of the Covid-19 pandemic and its implications for international travel and movement have also been profound during this period, and these impacts cannot be disaggregated, there are clear signs of a reduction in trade volumes and thoroughbred movements in recent months. Our analysis has found a **67%** reduction in British runners in the EU in the period to the end of February, while thoroughbred breeding notifications for temporary export in the same period have reduced by **61%**. We provide further information and context on some of the challenges of thoroughbred movement since 1 January in our answers below.

There is evidence that matters are beginning to settle as businesses adjust to the new arrangements, and we continue to provide proactive support and advice as an industry to businesses. However, we do believe that there are further enhancements which can be made in the short term – including digitisation of documents including Export Health Certificates and wider integration of industry and UK Government systems to facilitate trade.

Our industry is also preparing for the implications which the introduction of the EU's Animal Health Law (AHL) from April 2021 will have on thoroughbred exports to the EU, particularly for breeding and sales purposes. We have been working proactively as part of a European Industry taskforce on the AHL outlining sustainable solutions which do not damage the valuable ecosystem of European horse sport, racing and breeding and raise equine health and welfare standards. This taskforce is urgently seeking clarification on the implementation of the new Law and addressing the challenges which it presents. We provide more information on this in our response to Question 9 below.

In the longer-term, there are mechanisms in the *Trade and Co-operation Agreement* which can be utilised, alongside other options including a Common Veterinary Area – reflecting the High Health Status of the thoroughbred and competition horses – to facilitate movement. We hope to have the continued support of the UK Government in achieving our aims through these mechanisms as our new trading relationship with the EU develops, or at the very least on a bipartite basis with Ireland given the significant interdependencies of the relationship between our jurisdictions.

We also encourage the UK Government to recognise the High Health Status of the thoroughbred in its approach towards checks for thoroughbred imports entering Great Britain. In this respect, we welcome the decision by UK Government to delay the requirement for additional checks on live animal imports into the UK until March 2022, and believe at that stage a risk-based approach can be adopted on checks for thoroughbreds (either returning to Great Britain or from the EU depending on circumstances and in line with the principle of reciprocation outlined above).

This risk-based assessment could include higher health standards and the digital movement system being designed by the thoroughbred industry can, if appropriately integrated with UK Government systems at the border, enable the continuation of movement of thoroughbreds into GB and facilitate non-tariff checks, to high health standards, to take place away from the border on a risk assessed basis.

Responses to the Committee's questions

1. Does the UK have sufficient resources and capacity to certify, record and inspect animal movements across its borders?

We share the concern of the British Horse Council in its submission to the inquiry that the current systems in place are paper-driven, inefficient, slow, resource heavy, expensive and environmentally unfriendly. While we understand that the Animal and Plant Health Agency (APHA) and Defra face many challenges in adapting to the new arrangements – as do businesses throughout the thoroughbred industry – we believe many of these could be alleviated through working with industry and integrated digital solutions.

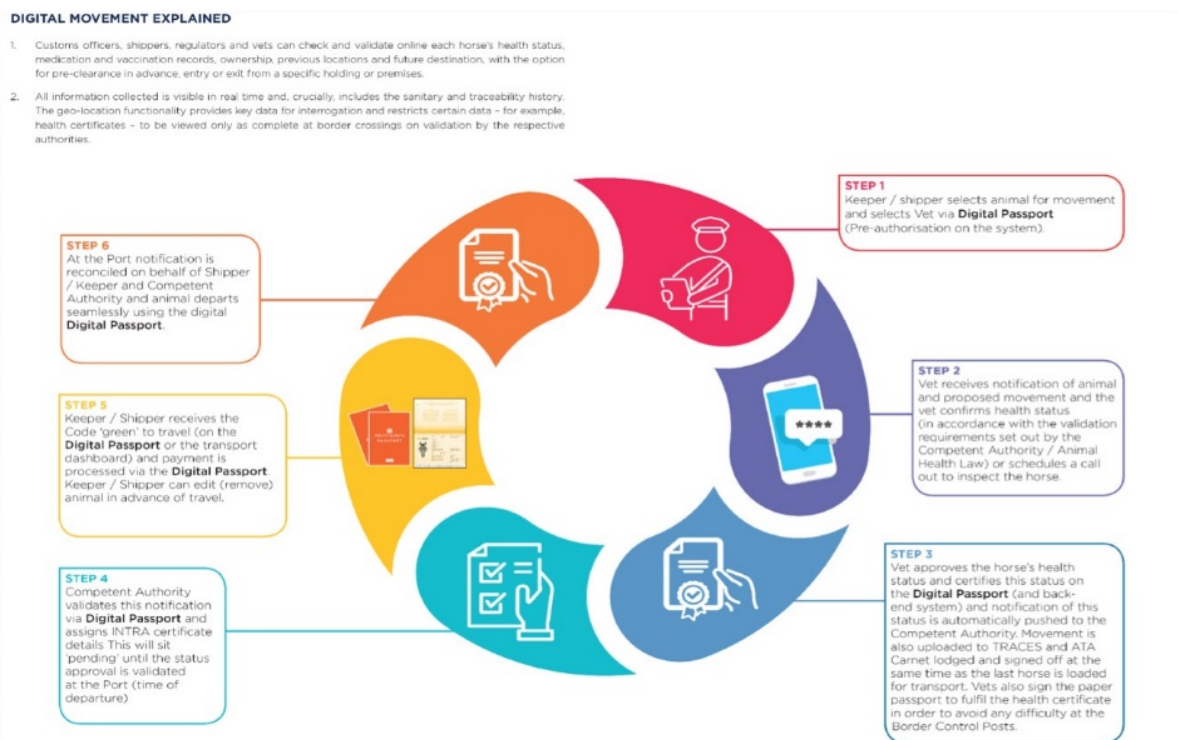
A particular example of this is in relation to Export Health Certificates (EHC's). While it was inevitable, particularly given the late agreement of the *Trade and Cooperation Agreement*, that there would be some additional friction and a bedding in period, the system can undoubtedly be improved through some digital enhancements. At present, EHC's on Gov.uk are simple scans, that require manual intervention and cannot communicate electronically with any other UK Government, foreign Government or industry system. They also include much redundant information. This is undoubtedly contributing to much confusion and issues at Border Control Posts on entry to the EU, and significant costs and delays.

We believe that this is not a solution which is sustainable in the long term. A fully digital approach, where industry data can populate the required forms, which also communicate with other required Government systems, would represent a significant improvement to facilitating trade and preventing equine welfare from being potentially compromised.

Weatherbys, who provide the data service to UK thoroughbred racing and UK and Irish thoroughbred breeding, have launched a new [E-Passport system](#), which will act as a digital lifetime document for the thoroughbred encompassing identification, vaccination and medical records, movement and ownership information.

Figure 1, below, outlines how this digital movement system can, if appropriately integrated with UK Government systems at the border, can facilitate movement through recording of information. It should be noted that the UK Government has clearly indicated its preference for digital livestock identification systems, included for horses.

Figure 1 – Thoroughbred industry proposals for digital movement system



2. How effectively will the UK be able to conduct animal disease surveillance and respond to outbreaks?

The British thoroughbred industry, alongside its primary trading partners, France and Ireland, has long maintained sanitary and disease control standards well in excess of those required under existing or upcoming EU law. These are underpinned by a commitment to international Codes of Practice published by the [Horserace Betting Levy Board](#), which are the international standard. The industry also adheres to the [International Agreement on Breeding, Racing and Wagering](#) set down by the International Federation of Horseracing Authorities.

Our industry remains wholly committed to maintaining and further improving these standards for international movement in the future, with our Horse Welfare Board's strategic plan, *A Life Well Lived*, outlining that the Board:

“recognises and emphasises that effective disease prevention, control and treatment, and robust biosecurity are essential in ensuring the welfare and quality of life of horses bred for racing. This is of the utmost importance and an area in which the industry performs well at macro level...”

The Horse Welfare Board has confidence that policies relating to disease control are informed by the latest information and opinion....

We underline the importance of continual disease control, research and surveillance and of the need to make changes and improvements as appropriate, e.g. in acting on credible new research and data, or in ensuring that protocols addressing new and evolving vector-borne diseases are collated, readily implementable and effective. We also emphasise the need for the industry to retain its focus on, and investment in, this area”.

The thoroughbred racing industry has very recent experience of the challenges of animal disease, and the importance of a proactive surveillance system, as a result of the outbreak of equine influenza which necessitated a six-day suspension of racing in Great Britain in February 2019. Such events underline the industry's commitment to higher health standards, which can be enforced at the UK Border.

In the longer term, full, digitalised traceability of equines will provide much greater assurance from a biosecurity perspective and allow for any potential outbreaks to be dealt with quickly. Integration of these systems with industry – including through the E-Passport system outlined above – will improve outcomes significantly further. The UK can, by working closely with industry and utilising such solutions, take the opportunity to raise animal health and welfare standards further, including checks at the border, without any significant bureaucratic burden.

3. What impact will the new UK-EU agreement have on moving animals across the Irish border and between GB and the EU/Northern Ireland?

GB-NI Movement and the Irish Border

In relation to movement of animals across the Irish border, we would note that the jurisdiction of the BHA and other organisations who are members of the Thoroughbred Industries Brexit Steering Group applies to Great Britain only. Thoroughbred racing is regulated, and breeding represented, on an all-Ireland basis. Nonetheless, we continue to work with colleagues in Ireland as part of our wider approach to the implications of the new *Trade and Co-operation Agreement* and implementation of the Northern Ireland Protocol.

Whilst most attention has been on movements from Great Britain to Northern Ireland, controls on animal movement from Northern Ireland to Great Britain remain unchanged. Disease incursions from the EU are thus a real risk, such as with equine influenza which necessitated a six-day suspension of racing in Great Britain in February 2019. The UK can, by working closely with industry and utilising such solutions, raise animal health and welfare standards further, including digital checks at this border without any significant bureaucratic burden.

Wider GB-EU Movements

As indicated above, there has been additional trade friction, bureaucracy and costs involved in thoroughbred movement to the EU since 1 January 2021. The industry has been monitoring these aspects throughout recent months and has summarised the key changes in Figure 2 below.

While we acknowledge that there is a range of factors – including the Covid-19 pandemic – which will also have impacted on levels of movement, the Thoroughbred Industries Brexit Steering Group has conducted analysis of the levels of movements for racing and breeding purposes between Great Britain and the European Union since the new arrangements took effect.

This analysis has found that, in the period 1 January – 28 February 2021 compared to 1 January – 29 February 2020:

- British trained runners in races in the EU have fallen by **67%**, compared to a **23%** reduction in British trained runners in races across the rest of the world, including Saudi Arabia and the United Arab Emirates
- EU trained runners in GB races have fallen by **92%**, with a **93%** reduction in runners from the Republic of Ireland and **89%** reduction from Northern Ireland
- Thoroughbred Export Certificates for permanent export have fallen by **30%**, with a larger decrease in February
- Thoroughbred BCNs (Breeding Clearance Notifications for temporary exports) have fallen by **61%**

Figure 2 – Key changes in relation to EU-UK Trade and Co-operation agreement

Additional trade-related requirements include the need to:

- Complete Customs Registration (EORI) alongside Customs documentation
- Pay VAT on permanent imports or exports (or provide VAT security for temporary movements)
- Pay duty on non-UK/EU bred geldings

Additional paperwork requirements include:

- Need to maintain records of horse's whereabouts (permanent export)
- Need for Export Health Certificates outbound and return
- Need to register/pre-notify the movements, outbound and return (IPAFFS/TRACES)

Additional veterinary and residency requirements include:

- Need for EVA and EIA Blood tests
- Need for veterinary inspection
- Need to use authorised Border Control Posts for entry to EU

Outstanding issues remain surrounding:

- Transporter Authorisations
- Certificates of Competence
- Vehicle Approval
- Travel for foals at foot

It is, however, notable that the proportion of declared Irish and French runners at the 2020 and 2021 Cheltenham Festivals has remained broadly stable – at **38.6%** and **38.2%** of runners, respectively. This demonstrates the international attraction of major British racing Festivals remains strong, however, this cannot be taken for granted in the highly competitive international thoroughbred industry. We continue to engage proactively with a range of UK Government departments – in the context of the Government's 'Global Britain' agenda, Covid-19 recovery and, in line with our principle of reciprocation outlined above regarding future UK-EU trading arrangements – to ensure that British racing is proactively and appropriately supported in this increasingly competitive international context.

The industry has also conducted a qualitative survey of those who have undertaken thoroughbred movements since 1 January, in order to gain insight of the specific challenges currently being faced. Although we have only had a small sample of responses at this stage, some initial themes are emerging, in particular that:

- Costs for movements have significantly increased – in some cases doubling – owing to customs and regulatory fees
- Waiting times at Border Control Posts on entry to Calais have been between one and six hours
- No immediate welfare concerns have been raised owing to increased journey times at this stage. However, respondents noted that waiting times at Border Control Posts could pose an increasing challenge to welfare in the warmer summer months

Our anecdotal evidence does suggest that the initial challenges are beginning to subside as those moving thoroughbreds adjust to the new arrangements and complexities, although we are concerned that as more people begin to attempt movements as the wider public health situation with Covid-19 improves there could be further difficulties and complexities which emerge.

In this respect, we fully endorse the proposals outlined in the separate British Horse Council submission to this inquiry – in particular, the recognition of ‘high health horses’ travelling for racing, breeding and competition, which have greater individual traceability and are a lower risk to the general EU domestic population, being fast-tracked through digital identification.

The British thoroughbred racing and breeding industry emphasises that there is both a necessity for controls at the UK border to protect animal health and welfare but also there must be action to implement these with minimal friction.

We would also highlight that the existence of the landbridge between Ireland and the EU via Great Britain, for thoroughbred movements, demonstrates that there is confidence in the high animal health standards in place in Great Britain in the EU. Nonetheless, the landbridge also currently represents a commercial and animal health and welfare disparity for British thoroughbreds moving to Ireland or the continent compared to European counterparts. This is an unsustainable situation which can be resolved through either a pragmatic, digital solution being achieved between the UK and EU; or in the absence of such eminently achievable solutions, further support and measures – in line with the principle of reciprocity – being undertaken by the UK Government to proactively support the British thoroughbred industry.

In the most extreme cases, if matters do not improve, the new arrangements will reduce trade between Britain and the EU due to increased effort and costs. Breeders – particularly smaller outfits and those offering stallions standing at lower nomination fees – will be discouraged from using stallions outside of the Country where their mare ordinarily resides. This will have a long-term impact on the gene-pool of the thoroughbred.

Fortunately, there are mechanisms which exist – alongside the use of digital solutions in the short-term – to improve the situation which we outline further below.

Separately, we are in contact with HM Treasury and HMRC on the treatment of VAT on temporary imports of thoroughbreds to Great Britain. There are approximately **5,000** broodmares shuttling to and from the UK to the EU (predominantly Ireland), and over **1,500** international runners competing at British racecourses, annually. Well in excess of **95%** of these thoroughbreds will return, so the burden of having to lodge many thousands of pounds of security with the tax authority for an indefinite period will act as a significant deterrent to such movement – potentially undermining the industry’s pre-eminent international position. The issue is predominantly one of cashflow, rather than revenues being lost to the Exchequer, and we have provided proposals on how appropriate protections can be put in place to safeguard revenue without undermining the competitiveness of the industry.

4. How should the Government balance animal health and welfare alongside economic interests?

In our view, this does not need to be an either/or question as higher animal health standards, and implementation of digital, industry-based solutions can both support economic interests and enhance animal welfare standards. A healthy thoroughbred herd will undoubtedly lead to a more prosperous trading environment for all countries.

We would highlight that, under the *UK-EU Trade and Co-operation Agreement*, there are provisions for ongoing co-operation regarding public, animal, and plant health and to limit technical barriers to trade. The agreement allows the UK and the EU to cooperate on avoiding unnecessary SPS barriers to trade in agri-food goods through a bespoke Ministerial Committee. Over time, it is hoped this Committee will help to reduce the burden on businesses from border controls and certification requirements, as well as taking a risk-based approach to checks based on high standards of biosecurity.

We firmly believe that the proposals of the European Taskforce for Brexit and EU Animal Health Law – a collaboration of the key European Sport Horse and Thoroughbred horse racing and breeding industries, and formed by the International Horse Sports Confederation (IHSC) constituted jointly by the Fédération Equestre Internationale (FEI) and the International Federation of Horseracing Authorities (IFHA) – would represent a suitable set of proposals for this Joint Committee to consider once it is constituted.

We append at **APPENDIX A** the submission of the Taskforce to the EU for a digital passport – as outlined at Figure 1 above – comprising identity, vaccinations & medical records, movement, and ownership (including change of ownership) which provides Competent Authorities of the countries of the Union with all the information and health guarantees they require. We would encourage the UK Government to pursue this proposal – on which we have closely consulted with Defra – through its representation on the Joint Committee structure.

We would also – per the British Horse Council Submission - ideally like to see the UK Parliament and Government seriously consider a common veterinary area (CVA) between the EU and the UK, as this would overcome many of the barriers facing equine movement and the associated welfare implications.

9. What impact will the EU Animal Health Law have on the movement of equines between GB and the EU/NI from April 2021

Even before the Covid-19 pandemic, and the significant challenges which it has brought for the finances of the European equine and thoroughbred sector, there were concerns regarding the implications of the EU Animal Health Law for the movement of thoroughbreds for breeding and sales purposes in particular. Sadly, despite significant engagement at EU President, Commissioner and Negotiation team level through the Animal Health Law taskforce, we remain concerned at the implications of this legislation for the wider European thoroughbred industry.

This includes the apparent need for a 30-day ban on the introduction of animals into an equine establishment prior to travel, and the requirement to remain at the destination for 30 days, prior to return. Some of the practical implications of this for sales and breeding movements include:

- Implications for 'walk in' mares' trips to British stallions for cover and return straight back to the EU, a key feature of the thoroughbred breeding industry.
 - In the absence of exemptions, mares' owners may simply decide to stay in the country where they are based, or make use of the land bridge instead – in both cases undermining the British thoroughbred breeding industry
- Additional expense of building/acquiring additional quarantine facilities for isolating breeding stock prior to travel; or following sale at public auction

With 30 days to go until the introduction of the EU Animal Health Law, and with – at the time of writing – the final draft EU Export Health Certificates contradicting the need for this apparent 30-day isolation, we continue to engage proactively through Defra and the AHL Taskforce on what the EU legislation actually requires and how it can be improved through the digital solutions outlined above. Nonetheless, the UK Government should also be prepared, if required, to reciprocate on measures should this not prove possible in order to support the British thoroughbred industry.

10. Will the rules and checks on the movement of equines be strong enough to prevent illegal activity? If not, what could be improved?

Overall, we would highlight that it is important all parties involved in enforcement should operate in a well aligned, collaborative and consistent way, as outlined in the British Horse Council submission.

In our view, the streamlined, digital processes which have been outlined above in this submission can help to minimise the temptation for those moving equines to attempt using longer routes – particularly through Northern Ireland – to avoid checks, thus potentially compromising equine welfare.

Stricter enforcement against this route being used for this purpose is required by Government. This also prevents those transporting thoroughbreds in a safe, compliant manner from being disadvantaged commercially.

As an industry, we will also be proactive in promoting good practice in transport of racing thoroughbreds, mares and foals as part of our commitment to further enhancing animal health and welfare standards.