

10/07/2019

Greyhound Racing Regulation 2019  
Office of Racing  
GPO Box 7060  
SYDNEY NSW 2001  
[racing.admin@racing.nsw.gov.au](mailto:racing.admin@racing.nsw.gov.au)

Dear Madam/Sir

Thank you for the opportunity to make a submission to the draft Greyhound Racing Regulation 2019. The Greens believe that the greyhound racing industry is incompatible with animal welfare and should be shut down. The industry continues to tolerate the deaths of thousands of dogs. Figures from the Greyhound Welfare and Integrity Commission (GWIC) show that 40% of greyhounds leave the industry dead<sup>1</sup>.

The Special Commission of Inquiry into the Greyhound Racing Industry in NSW found that "of the 97,783 greyhounds that were bred in New South Wales in the last 12 years, the evidence suggests that somewhere between 48,891 and 68,448 dogs were killed because they were considered too slow to pay their way or were unsuitable for racing"<sup>2</sup> and that "10-20% of trainers engaged in the barbaric practice of live baiting, where a vocal minority of trainers believed live baiting was necessary even after the Four Corners exposure and where large sections of the industry must have known that live baiting was occurring but did nothing to stop it."<sup>3</sup>

Despite these stark findings of the Special Commission, the NSW Government continues to permit this industry to exist and subsidise it with public money. We believe that if Greyhound Racing is to continue in New South Wales, the regulations should be as strong as possible in order to attempt to reduce deaths, injuries and animal cruelty.

Please find our detailed comments on the proposed regulation below.

### **1. Support for expanding the definition of a greyhound racing industry participant.**

The Regulations propose to expand the definition of a greyhound racing industry participant to a wider range of people, including: people who provide health services to greyhounds, people who handle greyhounds, people who artificially inseminate greyhounds, proprietors of trial tracks, officials at trial and race tracks, persons who offer applications for financial interests in greyhounds and people who manage ownership of greyhounds.

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<sup>1</sup> <https://www.pedestrian.tv/news/almost-40-of-nsw-racing-greyhounds-are-leaving-the-industry-dead/>

<sup>2</sup> Special Commission of Inquiry into the Greyhound Racing Industry in NSW, Volume 1, Page 1

<sup>3</sup> Special Commission of Inquiry into the Greyhound Racing Industry in NSW, Volume 1, Page 6

We support the expansion of GWIC's powers to monitor, investigate and regulate people in these classes of participant, as greyhounds in their care are at risk of mistreatment and cruelty, especially due to the widespread industry use of 'muscle men' in place of qualified veterinarians. The Special Commission of Inquiry into the Greyhound Racing Industry in NSW found that " muscle men often use, for treating greyhounds, drugs that are unregistered and unlabelled, and not intended for use for greyhounds" and "that the widespread treatment of greyhounds by muscle men, engaged by industry participants, places many greyhounds at significant risk of harm"

<sup>4</sup>

GWIC needs to be vigilant to ensure that any person who provides health services to greyhounds is qualified to do so, and are not engaging in painful procedures such as blistering, sclerosing, pin firing and needling.

To date, GWIC has not been effective in monitoring greyhound racing participants. For example, the recent case of Charles Sultana, who was found guilty of seven counts of being in charge of an animal and failing to provide vet treatment, was identified by the RSCPA, not by GWIC. GWIC needs additional budget, drawn from Greyhound Racing NSW and not from the taxpayer, to effectively utilise these new powers.

## **2. Proposed Register of Greyhounds is insufficient and fails to establish lifecycle tracking.**

The Regulation proposes to require the Commission to keep registers of registered greyhounds. The regulation as written completely fails in the objective of whole of life cycle tracking and care, which is incongruent with the recommendations of the Special Commission of Inquiry into the Greyhound Racing Industry in NSW, the Greyhound Industry Reform Panel and even the industry's proposed guarantees to reform greyhound racing.

There is still no plan to track greyhounds once they have been adopted. The proposed register would allow an owner to adopt out an animal to a relative or associate, who would then be free to dispose of the animal to the local pound or have the animal euthanised, with the owner having discharged their responsibilities. This is an ongoing concern which has been a risk for some time and which has not been addressed. Page 9 of the "Chief Executive Brief PN25/106—Greyhound Euthanasia Considerations and Emergency Euthanasia Provisions" of Greyhound Racing NSW states, "There remains a risk that a greyhound owner may submit to GRNSW a Notification of Retirement form advising their greyhound has been retired as a pet to friend or family member. As the greyhound is no longer registered with GRNSW, this friend or family member could immediately take the greyhound to the local council with the intention that the greyhound be euthanized".

Despite this risk being raised many times by the Greens and animal welfare groups, there is still no commitment to lifetime tracking. We believe that there should be a requirement to monitor the welfare of all greyhounds that exit the industry alive to ensure they are cared for throughout their entire life cycle.

In addition, any register needs to be publically available in order for the public to identify dogs that have been killed, for example after receiving a treatable injury.

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<sup>4</sup> Special Commission of Inquiry into the Greyhound Racing Industry in NSW, Volume 2, Page 179

### **3. Annual reporting requirements of Greyhound Racing NSW and Greyhound Welfare Integrity Commission are not sufficient.**

The proposed annual reporting requirements of the Greyhound Racing Welfare Integrity Commission are completely inadequate. The requirements appear to be designed to hide negative animal welfare outcomes of greyhound racing. For example, the only way for the public to know how many dogs are killed each year is to submit costly Government Information (Public Access) Act 2009 (GIPA) applications.

This complete lack of transparency, especially for an industry that is regulated by law and receives a significant amount of public money, is unacceptable.

At a minimum, GWIC should be required to publish full statistics on the following in its annual report:

- Greyhounds Euthanised:
  - Euthanised due to injury
  - Euthanised due to illness
  - Euthanised due to age
  - Euthanised by a registered vet on-track from an injury
  - Euthanised due to being deemed 'Not Suitable for Re-homing'
  - Euthanised due to Unsuccessful Re-homing
  - Greyhounds Registered as leaving the industry
  - Greyhounds retired as a pet to self (participant)
  - Greyhounds retired by the participant to a private person (non-participant)
  - As a pet through Greyhounds as Pets
  - Greyhounds Exported, including destination countries.
  - Surrendered to another agency, such as RSPCA NSW or a Council facility (including details of participants charged by GWIC as a result of abandoning the animal and whether or not that animal is euthanized at that facility).
  - Deceased from track injuries (reported by GWIC as 'sudden deaths')
- The details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed. GWIC should also publish any transfers of greyhounds that happen after an individual is charged with a drug offence.

Greyhound Racing NSW should be required to publish how many greyhounds were tested by Greyhounds as Pets, the failure rate, how many dogs are euthanised in the care of Greyhounds as Pets and how many dogs that have failed Greyhounds as Pets are subsequently put down.

### **4. Strong support for information sharing.**

We strongly support the increase in powers to share information contained on registers with animal welfare bodies, law enforcement and other Government agencies and bodies. This power is important to allow greyhound

racing participants who engage in animal cruelty, live baiting or other criminal acts to be identified and prosecuted and to save the lives of animals who are at risk.

**5. The proposed Penalty Infringement Notice (PIN) penalties are not strong enough.**

The regulation proposes to introduce Penalty Infringement Notices as an alternative or in addition to prosecution for offences under the Greyhound Racing Act 2017 . Such offences include contravening the code of practice, registration offences and the keeping of any animal that is reasonably capable of being used as a lure in connection with the trialling, training or racing of greyhounds.

While we understand prosecutions are sometimes lengthy and difficult and that Penalty Notices can be issued more quickly, they should be used in addition to prosecutions, not in their place. In addition, the proposed penalties in the regulation are too small to be a significant deterrent and should be increased by a factor of at least five times.

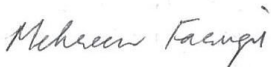
**6. No Clear Powers for Establishing a Puppy Bond.**

A key part of the Greyhound Industry Reform Panel was the introduction of a ‘puppy bond’. This recommendation was issued more than two years ago and is yet to be adopted. Greyhound Racing NSW themselves as recently as 2018 stated that they are “firmly of the view that the imposition of a ‘pup bond’ is an essential measure to control breeding and to ensure that the welfare for greyhounds across NSW is paramount. The pup bond is one of a number of important measures to reduce wastage proposed to be introduced by the new GRNSW leadership. These measures were recommended by the Greyhound Industry Reform Panel and approved by NSW Government in February 2017”<sup>5</sup>.

The Regulation should include the clear provision for introduction of a Puppy Bond.

Please do not hesitate to contact our offices for further information.

Kind Regards



Mehreen Faruqi  
**SENATOR FOR NSW**

**AUSTRALIAN GREENS SPOKESPERSON  
ANIMAL WELFARE**



Abigail Boyd  
**MEMBER OF THE NSW LEGISLATIVE COUNCIL**

**NSW GREENS SPOKESPERSON FOR ANIMAL FOR  
WELFARE**

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<sup>5</sup> <http://www.grnsw.com.au/news/clarification-of-wastage-figures>