

Supplementary Questions received 23 September 2022	GRNSW's response dated 5 October 2022
<p>1. Greyhounds As Pets NSW (GAP)</p> <p>a. What is the total number of greyhounds currently in care with GAP foster carers?</p> <p>b. How many foster carers does GAP currently have?</p> <p>c. What is the total number of greyhounds in GAP kennels?</p> <p>d. How many greyhounds were euthanised by GAP, including as 'necessary euthanasia', during each quarter of each of the financial years (FY) 2019-2020, 2020-2021, 2021-2022, and 2022-2023 to date?</p> <p>e. What is the total greyhound to GAP staff and volunteer ratio in GAP kennels, i.e., how many greyhounds is each GAP staff member or volunteer responsible for?</p> <p>f. Your most recent annual report states that 'GRNSW-assisted rehoming numbers rose to 1,880 for a single year', which includes figures of 521 dogs adopted at your centres, 220 rehomed through 'GAP NSW Regional Programs' and 1,139 through the 'GRNSW Homing Assistance Scheme'. GWIC's annual report records a total of 1,420 retirements in the same year, including 229 rehomed privately to a non- participant, 447 accepted by a rescue organisation, and only 339 accepted by GAP.</p> <ul style="list-style-type: none"> • Please explain this discrepancy. • Please provide information as to what you are doing to remedy this discrepancy. <p>g. GAP currently uses commercial pet shops such as Kellyville Pet Shop in Sydney to adopt out greyhounds. Kellyville Pet Shop has been known to sell un-desexed animals including puppies bred by the business owner at their Bathurst commercial and intensive breeding facility. Can you provide some background to the decision to use commercial pet shops to adopt out greyhounds exiting the industry?</p> <p>h. What is the procedure under which the greyhounds in GAP's care are regulated? For example, is there still a two strike rule in place regarding the number of greyhounds euthanised in GAP's care?</p> <p>i. Is GRNSW currently providing any direct or practical support to independent and specialist greyhound rescue and rehoming organisations as an alternative to using</p>	<p>a. 85 greyhounds are currently in care with GAP NSW foster carers.</p> <p>b. The number of GAP foster carers varies; currently as above.</p> <p>c. 120</p> <p>d. No unnecessary euthanasia occurs at GAP NSW. Necessary euthanasia of GAP NSW greyhounds in care is reported to the Office for Local Government on an annual basis. Please see below: FY19/20 = 0 FY20/21 = 4 (2 for medical reasons, 2 for behavioural reasons) FY21/22 = 3 for medical reasons FY22/23 = 0 (30/6/2022-4/10/2022)</p> <p>e. 1 staff member per 20 greyhounds.</p> <p>f. Answer provided during select committee as follows: <i>"Within that dataset there are two datasets. GWIC is a participant reported number and it's borne from compliance of the retirement notification form. From an assisted rehoming point of view, that's actually an output number. We're not reported the intake into GAP, and we obviously have greyhounds in care for a period of time before they're adopted; we are reporting the adoptions as they occur, which is output....Our inputs are that the microchips of</i></p>

<p>commercial pet shops? If yes please provide details, including amounts of financial contributions (or equivalent) and to which organisations.</p> <p>j. Matilda Duncan reported on 15 December 2021 that GAP advised a community rescue organisation that no greyhound returns were “accepted after 6 weeks, unless there were special circumstances”, and a senior staff member further advised a non-industry greyhound owner that GAP “won’t be able to take [a former GAP dog] into our care as per our current policies”. Is this an accurate reflection of GAP’s policy? Please provide further information and a copy of relevant policies.</p>	<p><i>the greyhound are recorded and that microchip number is unique to every greyhound.</i></p> <p>g. GAP holds adoption events at sites where potential adopters are able to attend. There are numerous sites used including parks, pet stores, dogs in the park event days and the GAP adoption centres.</p> <p>h. GAP follows GWIC’s compliance and rehoming policy. There is no two strike rule.</p> <p>i. GRNSW does not provide any support to commercial pet shops. GRNSW provides financial support to other independent and specialist greyhound rescue and rehoming organisations through the Homing Assistance Scheme and the Greyhound Rehoming Organisation Grant Scheme.</p> <p>j. This is not GAP NSWs adoption centre returns policy. In brief the policy allows for: -Up to 6 weeks return + refund fee. -Up to 6 months all returns, -After 6 months case by case review.</p>
<p>2. GRNSW & GAP funding</p> <p>a. For the 2019/2020, 2020/2021 and 2021/2022 periods, what is the total revenue received by GAP as a charity by way of public donations and fundraising, bequests and sponsorship? Please provide a breakdown of revenue source.</p> <p>b. Is funding received by GAP ringfenced to be expended only by GAP, or is it absorbed into the general GRNSW budget?</p>	<p>a. For FY19, 20, 21 and 22 total revenue received by Greyhounds as Pets (GAP) Trust is \$432,998.16</p> <ul style="list-style-type: none"> - Adoptions \$80,472.50 - Donations \$352,525.66 <p>b. Yes, funding received by GAP Trust must be applied to GAP activities only.</p>

<p>3. GAP rehoming assessments and pre-assessments</p> <p>a. How many greyhounds were rejected, not accepted, or asked to reapply at a later date instead of being admitted on application by GAP during each quarter of each of the financial years 2019-2020, 2020-2021, 2021-2022, and 2022-2023 to date?</p> <p>b. How many rehoming assessment or pre-assessment applications were received by GAP during each quarter of each of the financial years 2019-2020, 2020-2021, 2021-2022, and 2022-2023 to date?</p> <p>c. What is the specific criteria including any documented temperament test for rejecting greyhounds that have applied for GAP?</p> <p>d. Who at GAP makes the decisions to accept or reject greyhounds and what dog, greyhound and behavioural training, qualifications and experience do they have?</p>	<p>a. GAP NSW records the number of greyhounds being assessed each quarter and those accepted into GAP NSW adoption centres and those requiring further pet prep with the owner or via the pet prep program.</p> <p><u>Note:</u> From FY 2020/21 GAP NSW started a pet prep program and from 1st July 2021 the assessment test changed to the Greyhound Emotional Wellbeing Assessment (GEWA) [see d below for further details].</p> <p>FY 2019/20:</p> <p><u>Q1</u> Total assessments undertaken: 113 GAP NSW Adoption Centre Intake: 69 Not accepted/Referred for further pet prep: 44</p> <p><u>Q2</u> Total assessments undertaken: 105 GAP NSW Adoption Centre Intake: 68 Not accepted/Referred for further pet prep: 37</p> <p><u>Q3</u> Total assessments undertaken: 126 GAP NSW Adoption Centre Intake: 78 Not accepted/Referred for further pet prep: 48</p> <p><u>Q4</u> Total assessments undertaken: 167 GAP NSW Adoption Centre Intake: 119 Not accepted/Referred for further pet prep: 48</p> <p>FY 2020/21:</p> <p><u>Q1</u> Total assessments undertaken: 114</p>
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	<p>GAP NSW Adoption Centre Intake: 84 Referred for further pet prep: 30</p> <p><u>Q2</u> Total assessments undertaken: 133 GAP NSW Adoption Centre Intake: 104 Referred for further pet prep: 29</p> <p><u>Q3</u> Total assessments undertaken: 147 GAP NSW Adoption Centre Intake: 109 Referred for further pet prep: 40</p> <p><u>Q4</u> Total assessments undertaken: 116 GAP NSW Adoption Centre Intake: 97 Referred for further pet prep: 19</p> <p>FY 2021/22:</p> <p><u>Q1</u> Total GEWA undertaken: 102 GAP NSW Adoption Centre Intake: 93 Referred for further pet prep: 9</p> <p><u>Q2</u> Total GEWA undertaken: 93 GAP NSW Adoption Centre Intake: 83 Referred for further pet prep: 10</p> <p><u>Q3</u> Total GEWA undertaken: 99 GAP NSW Adoption Centre Intake: 92 Referred for further pet prep: 7</p> <p><u>Q4</u> Total GEWA: 153 GAP NSW Adoption Centre Intake: 136 Referred for further pet prep: 17</p>
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	<p>FY 2022/23 to 30 August: Total GEWA undertaken: 57 GAP NSW Adoption Centre Intake: 55 Referred for further pet prep: 2</p> <ul style="list-style-type: none"> b. All applications received are booked in for a pet ready test so please see numbers in a) above. c. No greyhounds are rejected by GAP NSW. d. All relevant GAP NSW adoption centre staff carry out the pet ready testing in greyhounds presented for assessment. The test carried out is called the Greyhound Emotional Wellbeing Assessment (GEWA). No greyhounds are accepted or rejected. They are assessed and classified as 'pet ready' or 'not yet pet ready'. 'Pet ready' greyhounds come into the adoption centres for adoption. Owners/Trainers of 'Not yet pet ready' greyhounds are given advice and training on how to continue preparing their greyhound for pet life on the first test attempt. On the second test attempt if still deemed as 'not yet pet ready', participants are offered a spot for their greyhound on the Pet Prep Program. <p>GAP NSW staff hold a minimum level of qualification of Cert II in Animal Care or relevant subjects and are trained in-house in greyhound behaviour and the pet ready test procedure and interpretation.</p>
4. Martindale facility	

<p>a. Greyhound Racing NSW has a Development Application in place to establish what you refer to as a rescue and rehoming facility in Martindale in the Muswellbrook LGA for up to 400 discarded greyhounds, and you would be aware of the level of community and public opposition including over 1,000 formal public objections. GRNSW has claimed that it has consulted widely, but opponents, including the Martindale community, reject this claim. Additionally, GRNSW agreed to an online consultation with Animal Liberation in April and then cancelled the night before, promising to reschedule the consultation - but four months later you still have not done so. How can GRNSW claim it has consulted adequately when both the local community and greyhound advocates are saying there has not been adequate consultation?</p> <p>b. GRNSW has claimed that this proposed facility will be “No Kill”. Will this facility result in any reduction in the number of dogs killed by the industry elsewhere, like those with treatable injuries euthanised on racetracks by the industry’s own vets, rather than offering these injured dogs urgent vet care and a new life?</p> <p>c. If greyhounds arrive at the proposed Martindale “farm stay” facility and there is clear evidence that the dogs have been neglected or not been provided with the vet care or socialisation required under GWIC policy, what actions will be taken against the former owners and how will this information be recorded and reported publicly?</p> <p>d. Upon commencement of operation, will GRNSW be required to meet pound and shelter reporting requirements that council pounds are obligated to meet? Will you be publicly publishing comprehensive data on the dogs that pass through your facility?</p>	<p>a. Considerable consultation was undertaken including direct mail to stakeholders, in person visits to neighbours, radio information sessions and community consultation days. During this consultation GRNSW prioritised the community over anti greyhound racing groups in providing opportunities for individual consultation.</p> <p>b. GRNSW aims for no unnecessary euthanasia during racing and in retirement.</p> <p>c. GRNSW reports all concerns to GWIC currently and will continue to do so.</p> <p>d. GRNSW rehoming facilities report currently to the Office of Local Government and GWIC. GRNSW will meet all required reporting requirements.</p>
<p>5. Greyhounds in council pounds and shelters</p> <p>a. Advice received has indicated that during the month of August 2022 at least six greyhounds ended up in NSW council pounds and not all were microchipped or desexed as required under GRNSW rehoming rules and regulations. How many</p>	<p>a. This is a matter for GWIC https://www.gwic.nsw.gov.au/integrity/rulesandpolicies/re-homing-policy</p>

<p>greyhounds have been impounded as seized or surrendered in NSW pounds or shelters in the 2018/19, 2019/20, 2020/21 and 2021/22 financial years?</p> <p>b. What action has GRNSW taken to remind GRNSW participants of their rehoming obligations?</p>	<p>b. This is a matter for GWIC. https://www.gwic.nsw.gov.au/integrity/rulesandpolicies/re-homing-policy</p>
<p>6. NSW Race Injury Rebate Scheme – inception to date</p> <p>a. How many greyhounds have entered the Race Injury Rebate Scheme to date?</p> <p>b. How many have been euthanised?</p> <p>c. How many have been rehomed?</p> <p>d. How many have returned to racing?</p> <p>e. How many participants have engaged with the scheme?</p> <p>f. What is the total expenditure of the scheme?</p>	<p>a. 622 individual claims have been made through the Race Injury Rebate Scheme.</p> <p>b. The Race Injury Rebate scheme does not provide support for euthanasia. Participants are required to adhere to GWIC euthanasia policies and meet reporting requirements to GWIC on euthanasia. Details of euthanasia, including those greyhounds injured on track, are available from GWIC records/reports. GRNSW shares details of those greyhounds claiming the race injury rebate through the GWIC Race Injury Review Panel to allow GWIC monitoring.</p> <p>c. The Race Injury Rebate scheme is a financial scheme for supporting treatment for greyhounds seriously injured during racing and trialling. It does not provide support for rehoming. Participants are required to adhere to GWIC rehoming policies and meet reporting requirements to GWIC on rehoming. Details of rehoming are available from GWIC records/reports. GRNSW shares details of those greyhounds claiming the race injury rebate through the GWIC Race Injury Review Panel to allow GWIC monitoring.</p> <p>d. The Race Injury Rebate scheme is a financial scheme for supporting treatment for</p>

	<p>greyhounds seriously injured during racing and trialling. It does not provide support for returning to racing. GWIC maintains records of each individual greyhound which detail those that have suffered serious injury and returned to racing. GRNSW shares details of those greyhounds claiming the race injury rebate through the GWIC Race Injury Review Panel to allow GWIC monitoring.</p> <p>e. Trainers are often the representative party accessing the scheme so our records do not record exactly how many participants (owners, trainers, club staff) have engaged with the scheme. It can be assumed that the 622 participants who submitted claims have engaged with the scheme.</p> <p>f. Total expenditure of the scheme (FY 20, 21 and 22) is \$1,158,406.34.</p>
<p>7. Homing Assistance Scheme – inception to date</p> <p>a. How many greyhounds have entered the Homing Assistance Scheme in each financial year since its inception?</p> <p>b. How many have been euthanised and for what reasons?</p> <p>c. How many have been rehomed?</p> <p>i. Please provide a breakdown of to where and how these dogs have been rehomed, including to the rehoming owner, industry participants other than the rehoming owner, non-industry participants known to the rehoming owner, non-industry participants not known to the rehoming owner contacted via classifieds sites like Gumtree or Craigslist, to a greyhound-specific rehoming organisation, to a general rehoming organisation, etc.</p> <p>d. How many participants have applied for the scheme?</p>	<p>a. The Homing Assistance Scheme started in FY19/20. Since inception 3578 claims have been paid.</p> <p>b. The Homing assistance scheme does not provide support for or record euthanasia. Participants are required to adhere to GWIC euthanasia policies and reporting requirements.</p> <p>c. Participants are required to adhere to the GWIC Rehoming Policy and comply with GWIC's Notification of Retirement directly to GWIC, which indicates the rehoming pathway. This is not required to claim for the Homing Assistance Scheme.</p>

<p>i. How many have been rejected?</p> <p>e. What is the total expenditure of the scheme?</p> <p>f. Is the Scheme available to community greyhound organisations? If yes, please provide information about which organisations have accessed the scheme, the total number of applications and rejections, and how many greyhounds have been assisted by the organisation.</p>	<p>d. See Questions on Notice 4) and 5) for details. No eligible applications under the scheme terms and conditions are rejected.</p> <p>e. The total expenditure for the scheme since inception is \$2,151,062.38 (FY 20, 21 and 22).</p> <p>f. Yes, however, GRNSW encourages participants to access the scheme prior to surrender to any rehoming organisation to meet GWIC Rehoming Policy. If this is not done the rehoming organisation receiving the undesexed greyhound is able to access the scheme. See Questions on Notice 4) and 5). No eligible applications under the scheme terms and conditions are rejected.</p>
<p>8. Euthanasia of greyhounds by the greyhound racing industry</p> <p>a. Why is the industry still killing greyhounds with injuries that are rehabilitable given the range of available financial rebates which are supposed to encourage NSW participants to save lives rather than take them?</p> <p>b. How much is it costing GRNSW to kill a single dog on track by use of the industry's own vets?</p>	<p>a. This is a matter for GWIC.</p> <p>b. This is a matter for GWIC. There are no GRNSW vets.</p>
<p>9. Whistleblower policy</p> <p>a. When a whistleblower comes forward to GRNSW with a matter involving allegations relating to animal cruelty, suffering, or neglect, is the issue always referred to and dealt with by GWIC?</p> <p>b. Current GRNSW whistleblower policy does not include reporting of matters to the agencies authorised under the Prevention of Cruelty to Animals Act, such as RSPCA, AWL, or the NSW police. Why is this not included in the policy?</p>	<p>a. A person who comes forward to GRNSW with a matter involving allegations relating to animal cruelty, suffering, or neglect will not be considered a whistleblower for the purposes of GRNSW's Whistleblower Policy.</p> <p>The reason for this is that issues relating to animal cruelty, suffering, or neglect are the</p>

<p>c. Can a whistleblower be anonymous?</p>	<p>primary responsibility of GWIC rather than GRNSW. See s11 (a) of the <u>Greyhound Racing Act 2017</u>. GWIC's reporting systems are designed to allow allegations relating to animal cruelty, suffering, or neglect, to be made anonymously.</p> <p>Further an eligible Whistleblower is appropriately defined in GRNSW's policy as <i>"(a) a member of Staff; or (b) a relative or dependent (including a dependent of an individual's spouse)"</i>.</p> <p>In these circumstances such allegations will not fall within the definition of an eligible Whistleblower under GRNSW's Whistleblower Policy.</p> <p>b. The on reporting of these matters is not contemplated as within the scope and purpose of the Whistleblower policy, as it is designed to deal with protecting a member of staff who make eligible disclosures, however, it can be seen that on-reporting is anticipated when considering Clause 8.</p> <p>c. Clause 5 of the Whistleblower Policy which provides that "Disclosures can be made anonymously and all disclosures will be treated confidentially. There is no requirement for an Eligible Whistleblower to identify himself or herself to receive the protections outlined in this policy or under the "Whistleblower Laws".</p>
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<p>10. Survey of participants</p> <p>a. In response to a letter from the Minister for Racing regarding the survey that Greyhound Racing NSW commissioned of industry participants, Greyhound Racing NSW's chairman advised that a Senior Counsel had been appointed to conduct an independent external review and audit of Statutory and Licence compliance. Please provide a copy of the audit.</p> <p>- If you cannot provide a copy, please provide a summary of the findings.</p> <p>b. What follow-up communication has GRNSW undertaken with participants about this survey and results?</p> <p>c. Please provide the results of the survey.</p> <p>d. Has GRNSW commissioned or been involved with any other polling of any kind of either the general public or industry participants? If yes, please provide details.</p>	<p>a. Summary of findings: GRNSW sought independent advice from Senior Counsel. The advice was that there was no breach of GRNSW's operating license and therefore no further action was required.</p> <p>b. Nil.</p> <p>c. The results of the survey were incomplete due to the survey being halted before completion. Any data relating to this survey was deleted.</p> <p>d. No.</p>
<p>11. Track Minimum Standards</p> <p>a. All NSW Greyhound Tracks are required to comply with Minimum Standards, which came into effect in June 2020. Your Operating Licence states GRNSW must ensure race meetings only take place at tracks that meet the minimum standards. In February 2021 Minister Anderson stated in answers to Questions on Notice that 'it is anticipated that all tracks in NSW will be fully compliant with the standards by 2023'. Is every track currently 100% compliant with these standards? If not, why not and, where racetracks fail to comply, will racing at these venues be suspended?</p> <p>b. Has GRNSW always cooperated in a timely way with requests for information from GWIC concerning track minimum standard compliance?</p>	<p>a. The statement "...Minimum Standards, which came into effect in June 2020..." is not accurate. The <i>Minimum Standards</i> referred to were established in 2020. GRNSW is focussed on raising all tracks to relevant standards by 2023 as per its obligations under the Operating Licence.</p> <p>b. GRNSW continues to cooperate and liaise with GWIC in relation to the minimum standards and the compliance of track and facility safety.</p> <p>c. As per the Operating Licence, Minimum Standards are informed by the UTS research for</p>

<p>c. The Operating Licence states that the development of Minimum Track Standards should have been informed by the UTS research into optimal track design for safety and welfare.</p> <ul style="list-style-type: none"> i. Noting that GRNSW has plans to construct a new curved track as a part of the new Tweed racetracks, why was the recommendation to move away from curved tracks not incorporated? ii. Why has the recommendation to move from 8 to 6 dogs per race not been incorporated? iii. Noting that the minimum standards have not adopted these recommendations of the UTS research, does GRNSW believe the minimum standards meet the requirements of the Operating Licence? 	<p>optimal track design and safety.</p> <ul style="list-style-type: none"> i. The following excerpts can be found in the UTS <i>Identifying Optimal Greyhound Track Design for Greyhound Safety and Welfare Report (Phase II)</i>: “...It was recommended that GRNSW and the Australian Greyhound Industry reconsider their aversion to straight tracks and consider developing purpose-built straight tracks...It is believed that a straight track would provide an additional pathway to racing, particularly for those greyhounds suited to straight track racing and sprint race distances...”. ii. Since the 2017 Report, further analysis of the injury rate with the number of greyhounds in each race indicates that the ‘normalised serious injury rate’ is lower for the 8 greyhound races than the 6 greyhound races. iii. Yes, the minimum standards meet the requirements of the Operating Licence.
<p>12. Legal actions of GRNSW</p> <ul style="list-style-type: none"> a. Prior to the recent appointment of Mr Macaulay as CEO of GRNSW, did Mr Macaulay ever act as a legal representative of GRNSW? b. Has GRNSW or its legal representative/s ever sent ‘cease and desist’ style legal correspondence, legal correspondence seeking retractions and/or apologies for comment, or explicit or implied defamation threats to anti greyhound racing advocates? <ul style="list-style-type: none"> i. If yes, how many and when? 	<ul style="list-style-type: none"> a. Yes b. GRNSW’s legal advice is subject to ‘legal and professional privilege’.

<p>ii. If yes, has Mr Macaulay ever signed or been named as a sender of this correspondence either representing a firm contracted to represent GRNSW, or as a representative of GRNSW?</p>	
<p>13. Breeding</p> <p>a. You would be aware the NSW Select Committee into Puppy Farms in NSW has recently released its report findings and recommendations. You would also be aware that, based on GWIC whelping data (4567 dogs whelped in 2020/21) and retirement data (1,405 dogs retired in 2020/21) the industry is whelping 3.2 times more dogs than it is retiring, and based on GWIC whelping data (4567 dogs whelped in 2020/21) and GRNSW adoption data (1,880 retired greyhounds assisted) the industry is whelping 2.4 times more dogs than it is retiring. Breeding in NSW has increased by 50% since 2017 reforms to the industry, and industry and community rehomingers cannot cope with the number of dogs discarded every year.</p> <p>i. What actions has GRNSW taken to correct this greyhound puppy farm breeding?</p> <p>ii. Will you advocate for NSW to introduce caps on greyhound breeding in line with clear public expectations about the commercial and intensive breeding of dogs?</p>	<p>a. All breeding is regulated by GWIC.</p> <p>GRNSW continues to advocate to 'Greyhounds Australia' for a national approach to breeding controls.</p>
<p>14. GWIC consultation on greyhound-related DAs</p> <p>a. Recently a GRNSW participant was charged with 27 serious offences by GWIC and has been disqualified for a total of 30 months (pending the participant's appeal). Many of these charges involve serious animal welfare matters. The disqualification (if upheld) means that the participant cannot be involved in the greyhound racing industry in any</p>	<p>a. This is a matter for government policy.</p>

<p>capacity and cannot own or have custody of any greyhounds. In spite of strong planning objections by organisations like Animal Liberation, this same participant recently had a development application (DA) approved by Port Stephens Council for what was a previously illegal greyhound housing and breeding facility. The council consent conditions only make scant reference to animal welfare and it is apparent that advice was not sought from RSPCA NSW or GWIC.</p> <p>Given NSW will be tightening up such facilities where commercial and intensive dog breeding and housing occurs, will GRNSW actively support all such DAs involving GRNSW participant greyhound facilities being referred at least to GWIC for review and comment?</p>	
<p>15 Australian Community Media (ACM) partnership</p> <ol style="list-style-type: none"> When did GRNSW's partnership with ACM begin? When does it conclude? Does the partnership involve any exchange of money, goods or services, or any pro-quo agreements? <ol style="list-style-type: none"> If yes, who is receiving money, goods or services? What are the terms of the partnership? How many of the articles published by ACM as a part of the partnership have been wholly or partly authored by GRNSW staff or contractors? 	<ul style="list-style-type: none"> GRNSW's relationship with ACM is 'commercial in confidence'.
<p>16. Greyhound Care Scheme (GCS)</p> <ol style="list-style-type: none"> Dr Alicia Fuller told ACM the GCS was a key part of the next phase of GRNSW's plans towards no unnecessary euthanasia by 2023, which is a target under its operating licence. <ol style="list-style-type: none"> How does GRNSW define 'unnecessary euthanasia'? 	<ol style="list-style-type: none"> <ol style="list-style-type: none"> 'Unnecessary' euthanasia is the euthanasia of any greyhound other than in accordance with the guidelines for 'necessary' euthanasia (ie euthanasia that is necessary, reasonable and justified under POCTA) (see

<p>ii. From when does GRNSW expect to meet this target (eg. FY 2022/23, 1 January 2023, or FY 2023/24)?</p> <p>iii. In assessing whether this target is met, will GRNSW be assessing euthanasia across the industry, or only euthanasia performed by GRNSW/GAP?</p> <p>b) Dr Alicia Fuller told ACM that "one of the objectives of the program is to protect and promote greyhound welfare while supporting stakeholders in the industry achieve their goals". Please provide further information on GCS objectives and KPIs.</p> <p>c) Dr Alicia Fuller told ACM that GCS "is an additional layer to the schemes already in place"</p> <p>i. Please provide a complete list of schemes being referred to here.</p> <p>ii. How does GCS differentiate from these other schemes? What does GCS offer that is different?</p> <p>d) Have any previous GRNSW schemes been renamed or abolished in the last two years?</p> <p>e) The GCS will reportedly subsidise greyhound surgery and rehabilitation costs. Who will be able to access these aspects of the scheme? Will the scheme be made available to non-GAP greyhound rescue, rehabilitation, and/or rehoming organisations?</p>	<p><i>note 1 & 2 below).</i></p> <p>The three main reasons for necessary euthanasia are:</p> <ol style="list-style-type: none"> 1. Medical - euthanasia where a veterinarian certifies that the greyhound is suffering from an intractable condition or injury that causes significant pain or discomfort or a marked reduction in quality of life, such that it is inhumane or would otherwise compromise the welfare of the greyhound to delay euthanasia. 2. Behavioural – euthanasia where the greyhound is considered <i>dangerous (see notes 3 & 4 below)</i> and therefore poses an on-going risk to its carers, the community or other animals; or where the welfare implications of the greyhound's negative mental state, underpinning the behaviour/s, are determined to be refractory to treatment, such that it is cruel to keep the greyhound alive. 3. Legal - where a greyhound is legally required to be euthanased under a court order, or has been declared a dangerous or menacing dog under section 34 of the <u>Companion Animals Act 1998</u>. <p><u>Note 1</u></p> <p>Interpretation of POCTA is that for anyone euthanising (killing) a greyhound, including vets, it needs to be a reasonable step that is necessary to alleviate pain being inflicted upon the greyhound, or it needs to be necessary, reasonable and justifiable. Vets can destroy a greyhound without the consent</p>
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	<p>of the owner only in the specific circumstances of 26AA - where the greyhound is so severely injured, so diseased or in such a physical condition that it is cruel to keep it alive.</p> <p>The act of killing an animal is not an act of cruelty under POCTA 5(1) provided it is necessary, reasonable and justifiable (Section 4(2)). Also, if pain (suffering and distress) is being inflicted upon an animal, euthanasia may be a reasonable step that is necessary to alleviate the pain (Section 5(3)(b)).</p> <p><u>Note 2</u> The Veterinary Practice Regulation 2013 prescribes the vet code that vets must comply with note 1, which provides for euthanasia being an option for relieving pain or suffering, as appropriate.</p> <p><u>Note 3</u> <i>Dangerous</i> is defined here in terms of Section 33 of the <u>Companion Animal Act 1998</u>:</p> <p>1) 33 Meaning of “dangerous” For the purposes of this Act, a dog is <i>dangerous</i> if it—</p> <ul style="list-style-type: none"> a) has, without provocation, attacked or killed a person or animal (other than vermin), or b) has, without provocation, repeatedly threatened to attack or repeatedly chased a person or animal (other than vermin), or
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	<p>Additionally, serious injuries to persons or animals are as defined in the Act:</p> <ul style="list-style-type: none"> a) any injury that requires hospitalisation of a person or animal, b) a broken bone that requires medical or veterinary attention, c) a major laceration (that is, a wound caused by the tearing of body tissue or by multiple punctures caused by more than one bite from a dog) that requires medical or veterinary attention, d) a partial or total loss of sensation or function in a part of the body that requires medical or veterinary attention, e) any other injury requiring medical or veterinary attention, of the same level of seriousness as the injuries described in paragraphs (b)–(d), f) an injury that requires a person to have cosmetic surgery. <p><u>Note 4</u></p> <p>Suitability for humane necessary euthanasia on behavioural grounds can be satisfied if:</p> <ul style="list-style-type: none"> • Dangerous dog status is confirmed. • No underlying veterinary conditions are found to explain the behaviour and it is unsafe to work with the greyhound. • The behaviour is refractory to treatment and cannot be reasonably managed in a pet or foster home or rehoming programs.
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	<ul style="list-style-type: none"> ● The welfare of the greyhound is compromised, such that there is no reasonable expectation of improvement to welfare in the medium term and management of the behaviour is not reasonably possible or causes severe distress to the greyhound. <p>ii. GRNSW's unnecessary euthanasia target is set under the Operating License. FY23.</p> <p>iii. Across industry.</p> <p>b. GCS is an injury rebate scheme that aims to provide support for all greyhounds incurring a major injury whilst racing or trialling on GRNSW maintained tracks in NSW. The KPI for injury rebate scheme uptake by participants is 60%. Participants are still able to choose to cover the cost of veterinary treatment of injuries from their own finances.</p> <p>c.</p> <p>i. The existing Race Injury Rebate Scheme is still available for participants.</p> <p>ii. Increase financial support + care support is provided at time of injury and in the recovery period. Care support is available at GCS kennels with a veterinary nurse caring for the injured greyhounds.</p> <p>d. No.</p>
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	e. No. Participant claims immediately after on-track injury and must seek immediate vet attention as directed by GWIC and as per the Greyhound Code of Practice.
17. Greyhound Industry Reform Panel recommendations a. GWIC has previously advised that they are responsible for implementing 39 of the Greyhound Industry Reform Panel recommendations. Please provide a list of Greyhound Industry Reform Panel recommendations that GRNSW is wholly or partly responsible for the implementation of, and provide an update on the progress of their implementation. b. GWIC has previously advised that they have been unable to complete Recommendation 64 (Additional options for breeding controls and other total lifecycle management initiatives, including a target date for achieving zero unnecessary euthanasia, should be considered in two years informed by more robust data) as their progress on this recommendation is contingent on GRNSW's implementation of recommendation 63. <ul style="list-style-type: none"> i. Has GRNSW 'continue[d] to advocate for a national approach to breeding controls for greyhounds' in line with recommendation 63? ii. Noting the recommendations were made in February 2017 and recommendation 64 called for consideration of 'additional options for breeding controls and other total lifecycle management initiatives' two years following, would GRNSW support the immediate commencement of this recommendation? 	a. As at 30 June 2021, 108 of the 121 recommendations were fully implemented and two were part-implemented. GRNSW is solely or partly responsible for 13 of the recommendations from the Greyhound Industry Reform Panel. These are recommendations 63, 64, 71, 79, 80, 81, 82, 83, 91, 103, 104, 105 and 117. All of these are implemented. b. <ul style="list-style-type: none"> i. GRNSW continues to advocate to Greyhounds Australasia for a national approach to breeding controls for greyhounds. ii. GRNSW has also set a zero unnecessary euthanasia target that it is on track to reach.
18. Greyhounds in correctional facilities a. In each of the financial years 2019-2020, 2020-2021, 2021-2022, and 2022-2023 to	a.

<p>date:</p> <ul style="list-style-type: none"> i. what is the total number of greyhounds housed at NSW prisons or correctional facilities who have undergone or are undergoing care or rehabilitation? ii. of greyhounds housed in prisons or correctional facilities, how many have been rehomed or adopted out? iii. of greyhounds housed in prisons or correctional facilities, how many have been euthanised, for what reasons and who made the decision to euthanize? <p>b. Please provide the names of all prisons and correctional facilities that house greyhounds</p>	<ul style="list-style-type: none"> i. 6 kennels at Dyllwynia CS, 6 kennels at Hunter CS. Correctional facilities currently operate as an extension of GAP kennels; specific numbers are not available. ii. There are no specific numbers of housing from correctional services they are all part of the GAP rehoming figures. iii. Zero euthanised. <p>b. Currently Dyllwynia and Hunter correctional service facilities. They have 6 kennels each.</p>
<p>19. Funds reimbursed to rehoming groups by GAP</p> <p>a. Regarding funds reimbursed to rehoming groups by GAP during the last FY, please advise:</p> <ul style="list-style-type: none"> i. the total dollar figure reimbursed ii. the total number of groups that received such funds iii. the total number of groups denied such funds iv. reasons for denial of funds <p>b. Regarding funds reimbursed to private individuals by GAP during the last FY for expenses incurred in caring for an adopted greyhound, please advise:</p> <ul style="list-style-type: none"> i. the total dollar figure reimbursed, ii. the total number of individuals who received such funds, iii. the total number of individuals denied such funds, iv. reasons for denial of funds. <p>c. Regarding funds reimbursed to industry participants by GAP during the last FY for expenses incurred in caring for a greyhound please advise:</p> <ul style="list-style-type: none"> i. the total dollar figure reimbursed, ii. the total number of individuals who received such funds, 	<p>a.</p> <ul style="list-style-type: none"> i. GAP NSW does not reimburse funds to private rehoming groups. The GRNSW Greyhound Rehoming Organisation Grants Scheme grants totalled \$45,680 in FY21/22. Rehoming groups that are eligible under the grant scheme are able to apply for the grants. ii. One eligible rehoming group received a grant last FY. iii. No eligible groups or projects were denied funds. iv. Funds are only awarded if the Terms and Conditions of eligibility for the Grant Scheme are met. <p>b. Once a greyhound is adopted it is owned by the adopter who is responsible for the expenses and</p>

<p>iii. the total number of individuals denied such funds</p> <p>iv. reasons for denial of funds.</p>	<p>care of their dog. GAP NSW does not reimburse private individuals for the care of adopted greyhounds. Private individuals may be able to access the GRNSW Homing Assistance Scheme and the GRNSW Race Injury Rebate Scheme, if the greyhound meets the eligibility criteria of these schemes.</p> <p>i. 0</p> <p>ii. 0</p> <p>iii. 0</p> <p>iv. 0</p> <p>c. GAP NSW does not reimburse industry participants for the care of their greyhounds. Participants have access to the GRNSW Homing Assistance Scheme.</p> <p>i. 0</p> <p>ii. 0</p> <p>iii. 0</p> <p>iv. 0</p>
<p>20. Operating Licence</p> <p>a. Has GRNSW ever received advice from GWIC, the relevant Minister, the Office of Racing, or from an independent party that a breach of their Operating Licence has occurred, is likely to have occurred, or may have occurred?</p> <p>i. If yes, please provide a copy of the advice.</p>	<p>a. GRNSW received correspondence from the Minister for Innovation and Better Regulation, the Hon Kevin Anderson MP, on 21 November 2021. In that correspondence the Minister alerted GRNSW to a potential breach of its Operating Licence</p> <p>i. ANNEXURE A - Letter of 21 November 2021</p>
<p>21. Greyhound Racing Act 2017 Statutory Review</p>	

<p>a. Please provide a copy of your submission to the Greyhound Racing Act 2017 Statutory Review</p> <p>b. Did GRNSW receive a copy of the Greyhound Racing Act 2017 Statutory Review Report in draft form and/prior to its release?</p> <p>i. If yes, was feedback given on the report? Please provide a copy of feedback provided.</p>	<p>a. ANNEXURE B - GRNSW Submission to the Statutory Review of the Greyhound Racing Act 2017 (NSW)</p> <p>b. No.</p>
<p>22. Race footage</p> <p>a. Why does Greyhound Racing NSW edit race footage available on thedogs.com.au to remove footage of injuries and falls?</p> <p>b. Please provide all video footage of greyhound races occurring at race meetings listed on thedogs.com.au which have been edited after initial broadcast to omit all or part of footage which shows or may show a greyhound injury which has been documented in an associated Stewards' Report; including but not limited to all video footage of the following races:</p> <p>i. Race 1 at Richmond Straight on 1 May 2022,</p> <p>ii. Race 5 at Maitland on 28 April 2022,</p> <p>iii. Race 4 at The Gardens on 22 April 2022,</p> <p>iv. Race 2 at Gosford on 8 April 2022,</p> <p>v. Race 9 at Gosford on 8 April 2022,</p> <p>vi. Race 8 at Wentworth Park on 5 March 2022,</p> <p>vii. Race 11 at Wentworth Park on 18 February 2022,</p>	<p>a. Consistent with other sporting codes, GRNSW removes from its platforms race footage that it believes viewers may find distressing. Footage of all races are made available to GWIC as a matter of course.</p> <p>b. Video footage of <i>"races occurring at race meetings listed on thedogs.com.au"</i> can similarly be viewed at thedogs.com.au - save for those races where the decision has been made to remove the footage as per the answer above.</p>

<p>viii. Race 3 at The Gardens on 19 November 2021,</p> <p>ix. Race 3 at Lismore on 16 November 2021,</p> <p>x. Race 1 at Bulli on 26 October 2021,</p> <p>xi. Race 10 at Gosford on 21 October 2021,</p> <p>xii. Race 7 at Wentworth Park on 9 October 2021,</p> <p>xiii. Race 8 at Grafton on 26 September 2021,</p> <p>xiv. Race 5 at Richmond on 3 September 2021,</p> <p>xv. Race 6 at Richmond on 25 August 2021,</p> <p>xvi. Race 1 at Richmond on 24 August 2021,</p> <p>xvii. Race 7 at Wauchope on 7 August 2021,</p> <p>xviii. Race 4 at Richmond Straight on 31 July 2021,</p> <p>xix. Race 7 at Grafton on 25 July 2021,</p> <p>xx. Race 7 at Dubbo 26 June 2021,</p> <p>xxi. Race 3 at Bathurst on 6 May 2021,</p> <p>xxii. Race 3 at Wentworth Park on 17 March 2021,</p>	
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xxiii. Race 3 at The Gardens on 12 March 2021,	
xxiv. Race 1 at The Gardens on 12 March 2021,	
xxv. Race 2 at Dapto on 4 March 2021,	
xxvi. Race 3 at Maitland on 15 February 2021,	
xxvii. Race 3 at Bulli on 13 February 2021,	
xxviii. Race 1 at Casino on 11 February 2021,	
xxix. Race 8 at Maitland on 8 February 2021,	
xxx. Race 7 at Wauchope on 23 January 2021,	
xxxi. Race 9 at Wentworth Park on 16 January 2021,	
xxxii. Race 3 at Bulli on 12 January 2021,	
xxxiii. Race 5 at The Gardens on 15 May 2020,	
xxxiv. Race 3 at Maitland on 27 April 2020,	
xxxv. Race 4 at Maitland on 27 April 2020,	
xxxvi. Race 5 at Maitland on 27 April 2020,	
xxxvii. Race 6 at Maitland on 27 April 2020;	

<p>23. Greyhound welfare and integrity</p> <p>a. The rescue, rehabilitation and rehoming of greyhounds is considered a 'welfare' responsibility. Given the animal welfare and integrity responsibilities were removed from GRNSW by the NSW Government and transferred to the newly established GWIC, why is GAP and all its associated programmes still under GRNSW instead of GWIC?</p>	<p>a. In broad terms the welfare of greyhounds is a responsibility shared between GWIC and GRNSW.</p> <p>GRNSW is fulfilling one of its many welfare duties through the GAP Adoption Centres, GAP Regional Rehoming Programs and the financial assistance given to greyhound owners to aid in the transition of a greyhound to a life after racing. Additionally, GRNSW provides financial support to independent rehoming organisations.</p> <p>Further, Recommendation 81 of the 'Greyhound Industry Reform Panel' stated <i>"the commercial arm rather than the integrity commission should have the responsibility of managing industry based rehoming programs"</i>.</p>
<p>24. Queries relating to specific evidence provided by Mr Macaulay</p> <p>a. During the hearing, Mr Macaulay referred to "independently published research ... and 1.2 million fans in NSW". Please provide a copy of the research and any details GRNSW has about the author, those surveyed and funding for this research.</p> <p>b. During the hearing, Mr Macaulay referred to "transformational change including cultural and behavioural change...". When comparing the number of investigations involving GRNSW participants (drugging, cruelty etc) has the number and range of incidents increased or decreased when comparing investigations previously under GRNSW with investigations under GWIC?</p> <p>c. During the hearing, Mr Macaulay referred to the ratio of catastrophic injuries to the number of starts improving.</p> <p>i. Please confirm the number of catastrophic injuries for the 2018/19, 2019/20, 2020/21 and 2021/2022 FY periods.</p>	<p>a. GRNSW commissioned Futures Sport and Entertainment, a global sports management consultancy, to provide research on Greyhound racing fans in NSW and how they engage with the sport. Futures is fully owned by Interpublic Group, a listed business on the New York Stock Exchange (NYSE: IPG). Futures was founded in 2002.</p> <p>The report itself was written by Futures' Global Managing Director, Kevin Alavy.</p>

<p>ii. In each of the 2018/19, 2019/20, 2020/21 and 2021/2022 FY periods, how many more starts (races) did NSW greyhounds have?</p> <p>d. During the hearing, Mr Macaulay stated that “Greyhound Racing NSW and the sport more generally is being denied fair and equitable funding redistributions of the money the sport generates to the tune of about \$29 million a year... [that] would be money spent on greyhound welfare solutions and supporting the livelihoods of participants, who are the original generators of these funds.” How much of this \$29 million specifically would GRNSW allocate directly to greyhound welfare? Please provide a breakdown of how GRNSW proposes to allocate this potential funding.</p> <p>e. In response to a question from Ms Boyd asking ‘[If it is] true that GAP is turning away dogs who don't present in the most top condition, so that GAP is really only taking those dogs that can be easily rehomed and letting dogs like these ones be left for trainers and owners to take to rescue organisations’, Mr Macaulay advised that that is not true. Please provide data confirming the exact number of applications and requests it has received for GAP entries for the 2018/19, 2019/20, 2020/21 and 2021/2022 FY periods and how many greyhounds have transitioned through the GAP programmes in these same periods.</p> <p>f. During the hearing, Mr Macaulay stated that funding from the NSW Government, including through the Greyhound Future Fund, was contributing to “a whole slew of track improvements” and, later, “ongoing track renewal and safety improvements”. In regards to all NSW greyhound tracks where public money or GRNSW funding has been invested into track refurbishment, please list: The track name, the amount of funding, the specific type of refurbishments, the number of greyhound injuries and deaths in the two year period prior to the refurbishment and the number of greyhound injuries and deaths since the track refurbishment.</p> <p>g. During the hearing, Mr Macaulay spoke about concerns with the current disciplinary and tribunal system which regulates the NSW greyhound racing industry, as administered by GWIC. Mr Macaulay stated that, under this model, “you literally have judge, jury and executioner all under one roof, and there is a perception... that does not deliver, always, a just outcome”, and went on to say “I think it produces a much better outcome now than it probably ever has done in the past”.</p>	<p>Futures runs ‘Market Landscape Trackers’ on a monthly basis in various key countries in the global sports industry, including Australia. The Australian version of the Market Landscape Tracker was launched in May 2017 and in that time over 80,000 people have been surveyed. GRNSW appends Greyhound-specific questions to the survey.</p> <p>The survey is completed online by a nationally representative sample of adults. Respondents are chosen as to be representative in three dimensions: by age, gender and State / Territory.</p> <p>Fans are defined as those people who give a score of 4+ to the following question: “On a 1-7 scale, in the last month how interested have you been in each of the following sports” (where 1 = “not at all interested”; 7 = “highly interested”).</p> <p>In the most recent survey (August 2022), the research showed that there were 1.24m Greyhound racing fans in NSW.</p> <p>b. GRNSW does not have access to data of the number of investigations GWIC performs. Any questions regarding investigations by GWIC should be directed to the integrity commission. GRNSW is therefore unable to offer any comparison.</p> <p>c. Catastrophic injury rates per 1000 starts (supplied by GWIC, rounded to nearest decimal</p>
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<p>i. What disciplinary model did GRNSW use prior to the establishment of GWIC? How does the current GWIC approach differ to the previous GRNSW approach?</p> <p>ii. Would GRNSW prefer that all such investigations and outcomes were managed by either RSPCA NSW (with GRNSW funding) and/or via an Independent Office of Animal Welfare?</p>	<p>point). Total number of starters on NSW tracks includes TAB and non-TAB tracks.</p> <p><u>FY 2018-2019</u> Catastrophic Injuries: 1.2 per 1000 starts Starts: 81,282</p> <p><u>FY 2019-2020</u> Catastrophic Injuries:: 0.7 per 1000 starts Starts: 78,323</p> <p><u>FY 2020-2021</u> Catastrophic Injuries: 0.7 per 1000 starts Starts: 85,731</p> <p><u>FY 2021-2022*</u> (*Annual Report yet to be published) Catastrophic Injuries: 0.5 per 1000 starts Starts: 98,325</p> <p>d. It would be the intention of GRNSW to use the total sum of this money entirely for the welfare of greyhounds, participants and clubs in NSW.</p> <p>The specific areas in which any additional revenue to GRNSW (delivered by fair and equitable funding distributions) would be considered for allocation to GRNSW budgets are:</p> <ul style="list-style-type: none"> • Greyhound rehoming, including facilities, pathways, care schemes and educational programs;
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	<ul style="list-style-type: none"> ● Track and club infrastructure projects over the long term; and ● Prizemoney and other returns paid to participants such as travel subsidies. <p>e. See Question 3: For comment and numbers on GAP NSW entries. Greyhounds that transition through GAP NSW equate to GAP NSW adoption numbers from the GAP NSW adoption centres and GAP NSW Regional programs.</p> <p>GAP NSW adoption numbers below:</p> <p>FY 2018/19: 729 FY 2019/20: 497 FY 2020/21: 741 FY 2021/22: 756</p> <p>f. ANNEXURE C -Government-funded Projects</p> <p>Depending on their amount of race meetings annually, clubs are allocated track maintenance budgets. GRNSW's broader track maintenance funding over the past two financial years total approximately \$6 million.</p> <p>GRNSW undertakes general track maintenance works, to maintain tracks for week to week racing. The approximate total expense for this work is over \$2.4 million per annum. All tracks</p>
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	<p>including TAB, Non TAB and Training (trial) tracks are resurfaced each year using a portion of these funds.</p> <p>TAB tracks are resurfaced at a minimum twice annually. Non TAB Tracks are resurfaced at a minimum once annually. Public (training) Trial Tracks are resurfaced at a minimum once annually.</p> <p>Additionally a further \$600,000 per annum is distributed by GRNSW to race clubs and training centres for club maintenance and safety works.</p> <p>Injury data to be found at: https://www.gwic.nsw.gov.au/news-and-updates/reports-and-statistics/injury-report</p> <p>g.</p> <p>i. Matters were investigated by stewards or investigators to determine whether it would require to be dealt with by an inquiry. Inquiry held by stewards to determine outcome and impose any penalty (by way of in person or correspondence). A participant was able to appeal a decision through the Racing Appeals Tribunal relating to Disqualification, suspension or fine over \$200.</p>
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	<p>ii. Please refer to GRNSW's Supplementary Submission to the Select Committee dated 16 September 2022.</p>
<p>25. <u>2019-2020 and 2020-2021 annual report</u></p> <p>The report states: <i>"A change in the Commission's Greyhound Rehoming Policy in December 2019 saw a 33% decline in the monthly average number of greyhound euthanised overall in the first seven months after the reintroduction of the policy"</i></p> <p>If it was taken over the first six months it was only 25%</p> <p>a. Please explain how 33% was calculated.</p>	<ul style="list-style-type: none"> GRNSW has no record of this information being published in its Annual Reports.
<p>26. One of the deadliest periods for greyhounds in NSW occurred in the first half of 2021 (1 January to 30 June) thirty-six greyhounds perished on the racetrack, a 44% rise over the 25 that died during the same period in 2020 (1 January to 30 June)</p> <p>b. Do you calculate greyhound racing deaths in a financial year or a calendar year?</p> <p>i. How many greyhounds were euthanised/died at the racetrack in 2020?</p> <p>ii. How many greyhounds were euthanised/died at the racetrack in 2021?</p> <p>iii. How many greyhounds were euthanised/died at the racetrack so far in 2022?</p>	<ul style="list-style-type: none"> All questions are a matter for GWIC.

<p>27. With respect to the Greyhound Welfare Integrity Commission quarterly reports there appears to be a change of reporting from Quarter 3 2021. Prior to that it was “Euthanasia after registered veterinarian certified that the greyhound was behaviourally unsuitable for rehoming” but then it changed to “Euthanasia with statement that the greyhound was behaviourally unsuitable for rehoming”.</p> <p>a. Could you please explain who can currently deem a greyhound to be classified as “behaviourally unsuitable for rehoming”</p> <p>i. Do they have to be a qualified vet?</p>	<ul style="list-style-type: none"> ● This is a question for GWIC. The rehoming policy is not controlled by GRNSW.
<p>28. Greyhound Racing New South Wales (GRNSW) are required to produce annual reports which should in theory correlate with the Greyhound Welfare Integrity Commission quarterly reports.</p> <p>However, there are 7 occasions where they don’t for example:</p> <p>Minor II injury in the quarterly reports (GWIC) for 2019-2020 = 1235 Minor II injury in the annual reports (GRNSW) for 2019-2020 = 1435 Total unaccounted for = 1435-1235 = 170</p> <p>Retired in the quarterly reports for (GWIC) 2019-2020 = 1064 Retired in the annual reports for (GRNSW) 2019-2020 = 990 Total unaccounted for = 1064-990 = 74</p> <p>Medium injury in the quarterly reports for (GWIC) 2019-2020 = 786 Medium injury in the annual reports for (GRNSW) 2019-2020 = 762 Total unaccounted for = 786-762 = 24</p> <p>Euthanasia in the quarterly reports for (GWIC) 2019-2020 = 485 Euthanasia in the annual reports for (GRNSW) 2019-2020 = 468 Total unaccounted for = 485-468 = 17</p>	<ul style="list-style-type: none"> ● GRNSW has no record of this information being published in its Annual Reports.

<p>Death due to injury or accidental causes from quarterly reports (GWIC) = 73 Death due to injury or accidental causes from annual (GRNSW) (2019-2020) report = 81 Total unaccounted for = $81 - 73 = 8$</p> <p>Death due to injury, age or natural causes from quarterly reports (GWIC) = 115 Death due to injury, age or natural causes from annual (2019-2020) (GRNSW) report = 136 Total unaccounted for = $136 - 115 = 21$</p> <p>After a private vet certified that the greyhound unsuitable for rehoming from quarterly reports = 56 After a private vet certified that the greyhound unsuitable for rehoming from annual (2019-2020) report = 59 Total unaccounted for = $59 - 56 = 3$</p> <p>a. Please explain these anomalies. b. Please clarify which are the correct figures.</p>	
Ends.	

"ANNEXURE A"



The Hon. Kevin Anderson MP
Minister for Better Regulation and Innovation

Ref: COR-07977-2021

Mr John Williams
Chairman
Greyhound Racing NSW

Dear Mr Williams,

I write to seek clarity from you about the attached survey conducted by Greyhound Racing NSW on the 12th of October which has the potential to damage the standing of the industry and erode public trust in its operations.

The survey canvasses a number of topics including participant perceptions of NSW politicians, advances support for a number of significant changes to industry governance and regulation and infers that the long term viability of the greyhound racing industry is in jeopardy.

I am concerned the survey potentially breaches a number of sections of the operating licence issued to Greyhound Racing NSW and is contrary to the objects and functions of GRNSW as outlined in the Greyhound Racing Act 2017 (Act) and operating licence.

Breaches of the Operating Licence

Section 23(c) of the Act and Condition 2(c) of the operating licence obliges the licensee promote greyhound racing in the State as a competitive and sustainable industry with a **high level of public trust**.

Several elements of the survey have the capacity to undermine public trust in the industry, specifically:

- Assertions that the long term viability of the greyhound racing industry is in jeopardy;
- repeated suggestion that State Government involvement with industry is a primary impediment to the success of industry; and
- the inclusion of political polling.

As you would be aware, the NSW Government undertook a statutory review of the Act and the *Greyhound Racing Regulation 2019* facilitating extensive public consultation between June and September 2020 attracting over 1000 submissions. That work involved direct consultation with both Greyhound Racing NSW and the Greyhound Welfare Integrity Commission (GWIC).

The report of the NSW Government was tabled in April 2021. Overall the statutory review found that the policy intent of the Act remains valid with 16 recommendations made to improve the greyhound facing regulatory framework.

The NSW government is progressing implementation of those recommendations. The issuing of a survey by Greyhound Racing NSW that seeks to invite afresh changes to the regulatory framework has the capacity to undermine public trust in the due process exercised throughout the statutory review of the Act and in the Government's current work.

Additionally, Condition 22 of the operating licence requires the licensee to consult with the Greyhound Welfare Integrity Commission in the exercise of functions that impact the Commission exercising its functions.

I understand that at no stage has Greyhound Racing NSW advised GWIC of the survey content which invites feedback on potential significant changes to the operating environment of the industry.

Actions taken by the organisation outside the scope of the Act or the Licence

In addition to the previously detailed breaches of the Operating Licence, I have concerns that the organisation is acting outside the scope of objects and functions of GRNSW as outlined in the Act and operating licence.

Neither the Act, nor the operating licence grant any authority to Greyhound Racing NSW to propose legislative changes to the governance of the industry.

Additionally, neither the Act, nor the operating licence grant the authority to Greyhound Racing NSW to conduct political polling, or to deviate into the political arena.

Conditions 23 (a) and (b) of the operating license specifically require GRNSW to engage with stakeholders *"as appropriate for the purpose of performing the Licensee's functions."*

There is no reasonable grounds for Greyhound Racing NSW to conduct polling on the popularity of local Members of Parliament to fulfil any of the functions outlined in the Act.

Code of Conduct Breaches

The content of the survey also raises concerns about Director's compliance with the Greyhound Racing NSW Board Code of Conduct.

Section 1.2 details that Directors and delegates of the board are to maintain public confidence in the industry and are required to be honest, ethical, impartial and equitable.

The conducting of political polling by the licensee raises significant concerns about the impartiality of the organisation.

In light of these concerns, I seek assurances that the content of the survey was not considered or endorsed by the Board at any stage and that Directors have at all times acted to maintain public confidence in the industry. If appropriate I would ask that communication is undertaken to the industry to confirm the survey was not endorsed by the Board.

I also seek urgent advice from the Board on steps that will be taken to ensure future activities undertaken by Greyhound Racing NSW are consistent with the objectives and functions of the Greyhound Racing Act, the Operating Licence and uphold public confidence in the industry.

I look forward to your response and advice on what actions the Board will take to address these matters.

Yours sincerely

The Hon. Kevin Anderson MP
Minister for Better Regulation and Innovation

17.11.2021

"ANNEXURE B"



2 September 2020

The Hon. Kevin John Anderson MP
Minister for Better Regulation and Innovation
C/- The Office of Racing
Greyhound Racing Act 2017 Review
GPO Box 7060
SYDNEY NSW 2001

Dear Mr Anderson,

Statutory Review of the *Greyhound Racing Act NSW* 2017 (NSW) Submission by Greyhound Racing New South Wales.

We refer to the statutory review ("**the Review**") of the *Greyhound Racing Act NSW* 2017 (NSW) ("**the Act**") to be undertaken by the Minister in accordance with provisions of the Act.

We thank you for providing Greyhound Racing New South Wales ("**GRNSW**") the opportunity to make submissions in respect of the subject matter of the Review.

We now **enclose** GRNSW's submissions for consideration.

We would be pleased to respond to any queries you may have in respect of our submissions, or those of other interested parties.

Yours sincerely,

Hugh Armenis
Chairman
Greyhound Racing New South Wales

Tony Mestrov
Chief Executive Officer
Greyhound Racing New South Wales



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Greyhound Racing New South Wales

**Submission to the
Statutory Review of the
*Greyhound Racing Act 2017 (NSW)***





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1. EXECUTIVE SUMMARY

This document is Greyhound Racing New South Wales' (**GRNSW**) Submission to the Statutory Review of the *Greyhound Racing Act 2017* (NSW) (**the Act**).

GRNSW submits that the key aims of the Act in establishing the foundations for a sustainable racing industry with high standards of animal welfare and integrity have been met, but there are some adjustments which ought to be made to allow GRNSW to further its principal objectives.

The greyhound industry in NSW is the victim of multi-faceted historic distortions in the distribution of wagering revenue that unfairly and inappropriately cause it lost revenue of circa \$30 million per annum. The distortions adversely affect dividends from TAB distributions under the RDA, as well Tax Parity and POCT distributions. Over the period of FY 2020 alone, these distortions caused \$29.626 million to be inappropriately lost from NSW greyhound racing and diverted to other codes.

The combination of that lost revenue with the Act's statutory requirement for GRNSW to indemnify GWIC for costs adversely affect both the sustainability of the industry and welfare outcomes for greyhounds. GRNSW submits that deletion of the statutory funding requirement will go part-way to correcting the funding distortions. This will lead to substantial and desirable improvements in animal welfare (including ensuring GRNSW's ability to achieve zero unnecessary euthanasia) and the long-term sustainability of the industry, from racing to re-homing.

GRNSW submits that to meet its obligations under the Act and deliver its strategic plan objectives of a responsible, competitive and sustainable industry for NSW greyhound racing's participants and greyhounds that funding inequities must be addressed.

Accordingly, the key points of GRNSW's submission are as follows:

- That section 24(1)(f) of the Act be amended by deletion, and by a provision that the costs of the Commission be funded directly by government.
- That pursuant to section 25(3) of the Act, the Ministerial Operating Licence dated 3 July 2017 be amended by the deletion of clause 3(a)(vi).
- That regulatory amendment provide for Race Field Information Use fee caps to be removed or lifted.
- That distributions to GRNSW from TAB revenue via the RDA, and Tax Parity, and POCT should be reformed to fairly reflect the market contribution of greyhound racing to the raising of those revenue streams, and if that is achieved, that GRNSW should remain responsible through government for paying GWIC's *reasonable* operating costs;

OR, IN THE ALTERNATIVE:

- That GRNSW's statutory obligation to fund the operating costs of GWIC be removed from both the Act and Operating Licence, and that GWIC's operating costs be funded directly by government, either
 - (a) in full from the consolidated fund via normal State budgetary processes; or
 - (b) in full by a special appropriation under section 130 of the *Betting Tax Act 2001*, whilst preserving the current 13% POCT distribution made to GRNSW.

2. NOTES

Abbreviation Note:

For the purposes of these submissions, GRNSW adopts the Key Terms and abbreviations set out in the *Greyhound Racing Act 2017 Statutory Review Discussion Paper* published by the Better Regulation Division of the Office of Racing in July 2020.

Publication:

GRNSW consents to these submissions being published.

Purpose:

These submissions are made pursuant to the Call for Submissions made by the Office of Racing.

Complementary Purpose:

These submissions are designed to complement, not displace, various oral and written submissions made by GRNSW to Government in the normal conduct of GRNSW's business. As such, they should be interpreted as an adjunct to the various views, requests and suggestions made by GRNSW from time to time.

3. INTRODUCTION

Great strides have been taken by all industry leaders and participants in NSW since the events of 2016-17. Greyhound breeding, racing and retirement has been reformed from top to bottom. Racing safety has increased dramatically with improvements to tracks and the introduction of minimum track standards leading to an historically low number of race-day injuries. Welfare, which is a responsibility shared by GRNSW, GWIC, clubs and all participants, has improved with increased responsibility arising from a string of positive initiatives, and most recently the introduction of the Greyhound Code of Practice. GRNSW's Greyhounds As Pets (GAP) rehoming program has rehomed a record number of greyhounds, and motivated the public, trainers and owners to focus on the best retirement outcomes for dogs.

GRNSW has embraced the policy objectives of the Act since its commencement in 2017, has fulfilled its statutory obligations, and is committed to further commercial advances, and implementation of world-leading initiatives in greyhound welfare.

GRNSW facilitated and regulated the activity of 31 Greyhound Racing Clubs holding 1,151 races in NSW in FY20, and distributed \$36 million in prizemoney. More than 135,000 people attended greyhound race meetings in NSW in this same year.

In FY20, the greyhound industry in NSW sustained 3,580 full-time equivalent jobs, the majority of which are in regional areas.

Greyhound racing in NSW generated \$293.3 million in household income, involving 6,279 individuals, and made a Value-Added Economic Impact of \$509.7 million in the same period. (Source: IER Pty Ltd, *Greyhound Racing in Australasia – An Economic and Social Impact Assessment*, 2020, p46)

NEW SOUTH WALES

KEY IMPACTS



HOUSEHOLD INCOME GENERATED
AUD\$293.3 MILLION



FTE EMPLOYMENT SUSTAINED
3,580 JOBS



VALUE ADDED ECONOMIC IMPACT
AUD\$509.7 MILLION



VOLUNTEERS
1,188 INDIVIDUALS



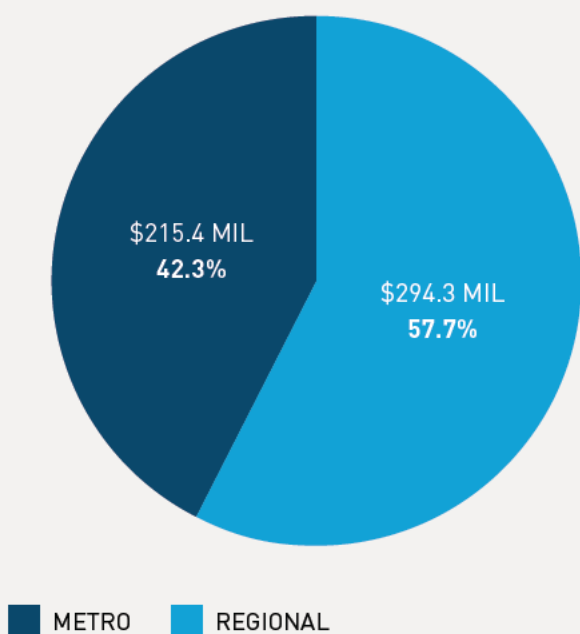
PARTICIPANTS IN RACING
6,279 INDIVIDUALS

NEW SOUTH WALES

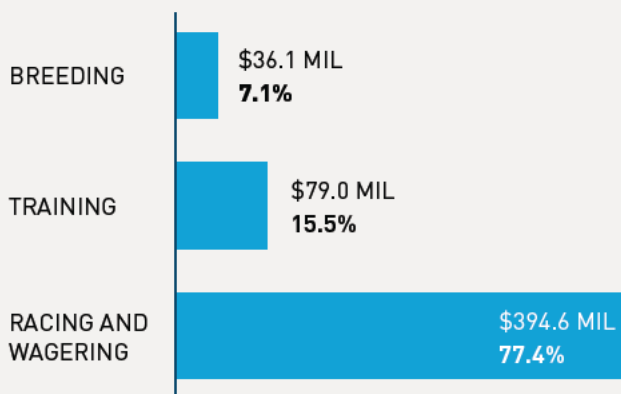
KEY IMPACTS

“ Greyhound racing in New South Wales is responsible for generating an economic impact of **AUD\$509.7 million** - 57% of which is in regional areas. ”

DISTRIBUTION OF VALUE ADDED ECONOMIC IMPACTS (\$AUD)



CONTRIBUTION TO VALUE ADDED ECONOMIC IMPACT (\$AUD)



BREEDING

INDICATOR	VALUE
Breeders	375
Breeders Staff	341
Females Covered	646
Pups Born and Whelped	3,907

TRAINING

INDICATOR	VALUE
Trainers	1,331
Kennel Staff	1,167
Greyhounds in Training	7,175
Owners and Syndicate Members	1,648

RACING AND WAGERING

INDICATOR	VALUE
Racing Clubs	34
Race Meetings	1,151
Races	11,331
Attendances	135,309
Prizemoney	AUD\$36.0 MIL

The success story of the new GRNSW, GWIC and the NSW greyhound industry is documented in GRNSW's Annual Report, which is presented to the Minister each year. A copy of GRNSW's most recent Annual Report is annexed to these submissions.

GRNSW as it exists today, and with the benefit of the 2017 reforms, is welfare-centric, agile and open-minded about ongoing reform, and has invested in maintaining the advances and high

standards that have been achieved in the past 3 years.

GRNSW is of the view that the recommendations, and where necessary, amendments, suggested in this submission will improve welfare outcomes, the sustainability of the greyhound industry and maintain the high level of public trust that is required to meet the policy objectives of the Act.

4. THE WELFARE OF GREYHOUNDS

ISSUE

Improvements in the welfare of greyhounds since the enactment of this Act.

Improvements in re-homing and welfare facilities and programs.

Improvements in safety and education for greyhounds and participants.

Whether animal welfare penalties and offences are contributing positively to behavioural change in the industry.

DISCUSSION

1. The Act and the industry reform that led to it has greatly improved animal welfare in the greyhound industry. Greyhound Racing in NSW is now a real success story. Even greater welfare initiatives are being self-introduced which have NSW leading the world in greyhound welfare.
2. The welfare of greyhounds is dependent on the implementation of numerous point-in-time and whole-of-lifecycle initiatives by all involved, led by GRNSW and GWIC.
3. GRNSW is largely focused on what might be called direct “boots on the ground” welfare initiatives including:
 - (a) participant training and education,
 - (b) improved club governance giving rise to thought-leadership in animal welfare,
 - (c) track improvements and safety-focused re-design,
 - (d) schemes for best treatment options for race injuries,
 - (e) adoption and rehoming.
4. GWIC, in line with its statutory obligations, focusses on Rule and Code compliance and veterinary attendance at race meetings leading to better welfare outcomes.

5. Since the commencement of the Act there has been a significant increase in greyhounds rehomed via GRNSW’s GAP program and through other recognised rehoming organisations. The increase in rehoming has been reported in GRNSW’s Annual Reports for 2017/18 and 2018/19.
6. The introduction of the Race Injury Rebate Scheme in the past year has improved greyhound welfare outcomes.
7. To highlight GRNSW’s role in welfare, it is first noted that as a consequence of GWIC commencing operation on 1 July 2018, that oversight of the Welfare function of the NSW greyhound industry became a shared responsibility between GRNSW and GWIC.
8. GWIC assumed responsibility for the development of the Code of Practice for the Welfare of Greyhounds, veterinary presence at greyhound racetracks and for the compliance of industry participants with respect to welfare of greyhounds in their care.
9. GRNSW retained responsibility for the rehoming of greyhounds, and training and education of participants and clubs to enhance welfare outcomes for greyhounds.

GRNSW programs include:

GREYHOUNDS AS PETS PROGRAM & REHOMING INITIATIVES

Greyhounds As Pets (GAP) NSW assisted in rehoming 729 Greyhounds in 2018-19 through its program and adoption centres, including the new Regional GAP program. It also increased funding to schemes providing financial assistance to greyhound owners, and other rehoming organisations to transition greyhounds from the racing industry into life as a pet.

Unaudited GAP numbers for the 12 month-period comprising the 2019-20 Financial Year show more than 1300 greyhounds were re-homed through this program.

Along with the GAP program run by GRNSW, there are several independent greyhound rehoming organisations in NSW and these groups, along with owners and trainers, play an active role in the rehoming of greyhounds.

GRNSW continues to provide financial support to independent greyhound rehoming organisations for greyhounds rehomed throughout the year.

In line with GRNSW's strategic pillar to be a responsible industry, GRNSW continues a "boots on the ground" welfare and re-homing focus.

GRNSW notes that during the 2018-19 racing calendar, there were 6505 registered racing greyhounds in NSW, all of which have a pathway to re-homing.

FARM-STAY

In July 2020 GRNSW announced a world-first Farm-stay facility in the Hunter Valley.

Farm-stay is a key platform in GRNSW's goal of zero unnecessary euthanasia.

Farm-stay will provide best-practice training for retired and non-racing greyhounds in an environment designed for their optimal transition into pets.

Farm-stay will add significant additional domestication opportunities for greyhounds as a pathway to adoption and enable any greyhounds that are not yet ready for adoption to be housed and trained in a safe and supportive environment.

BREEDING

GRNSW continues to encourage responsible breeding practices.

The future of greyhound racing is dependent on the industry providing a socially acceptable racing product and optimal breeding is required to provide enough greyhounds to fill the race calendar while minimising the number of pups whelped.

In July 2018, GWIC assumed responsibility for the controls related to breeding. Restrictions on the number of litters which a breeding female can have remained in place, as well as the rules on the age and frequency at which they can breed. This is a proper approach and supported by GRNSW.

GRNSW notes that whelping numbers are at historically low levels, and less than the ideal number. Indeed, the demand for adoption of greyhounds exceeds dogs available.

In those circumstances, GRNSW is very concerned about the ability of GWIC to impose a so-called "puppy bond" which would further disincentivise greyhound owners from breeding. A correction, even an excessive correction, has already been struck on breeding numbers. The introduction of a puppy bond would have potentially devastating effects on breeding numbers, reducing them to below replacement.

GRNSW submits that the circumstances which motivated both Michael McHugh and the GIRP to recommend a puppy bond have now so significantly changed and corrected that the foundation for the recommendation has ceased. The industry has:

- (a) Reduced and managed breeding levels;
- (b) Is on the cusp of instituting whole-of-life tracking;
- (c) Focussed on post-racing lives of greyhounds; and
- (d) Developed a sophisticated and well-functioning rehoming program.

Accordingly, any need that once existed for a puppy bond has been overtaken by better industry practice.

RACING SAFETY AT NSW GREYHOUND RACING TRACKS

Track safety and greyhound welfare is in a process of continual improvement through world's-best-practice track design, and improvements afforded by the Track Safety and Welfare Infrastructure Fund.

During August and September 2018, GRNSW funded the purchase of 21 new response vehicles to assist track staff to manage on-track injuries.

The response vehicles are electric and provide for an injured greyhound to be rapidly transported to the veterinary rooms for treatment. This initiative is not only a positive outcome for greyhound welfare, it also provides workplace health and safety benefits for track attendants who would otherwise have to carry a greyhound a considerable distance to the veterinary rooms.

The Race Injury Rebate Scheme introduced by GRNSW in March 2019 has been well received by participants. The scheme provides funding for the veterinary treatment of serious injuries that occur during racing. The high cost of treatment for serious injuries may have limited treatment options for many participants in the past. Greyhounds treated under the new scheme are rehomed as pets, retired as a breeder or return to racing.

GRNSW plays a key role in implementing new initiatives to reduce the risk of greyhounds being injured on or off tracks. Via its membership of the Race Injury Review Panel established by GWIC, GRNSW provides input on veterinary matters and the status of track maintenance to assist in identifying underlying causative factors, and preventing or reducing injuries going forward.

EDUCATION

To provide direction for education activities under the new regulatory structure, the Greyhound Industry Participant Education Steering Committee was established to determine the short, medium and long-term education requirements for participants.

The intent is to determine the formal and informal education needs of participants and for GWIC to provide advice on courses and other education materials that will be required for accreditation of participants for future registration.

To ensure the education activities meet industry expectations, the Committee includes membership from GRNSW, GWIC, GBOTA and the NSW Agrifood Industry Training Advisory Board.

GRNSW provides a diverse and relevant education and training program for industry participants in accordance with regulatory requirements, with a strong focus on greyhound welfare. In 2016, a first aid course for participants was introduced.

Interest in this course has been consistently strong and 466 industry participants had successfully completed the course as of 30 June 2019.

The Pet Prep Program, which focuses on the preparation of greyhounds for rehoming from the time they are pups, was successfully introduced in 2018.

RECOMMENDATION

It is recommended that there be special funding granted for GRNSW's Farm-stay program and all re-homing and welfare activities. This will assist GRNSW to achieve its target of zero unnecessary euthanasia and create pathways for greyhounds born into the industry to be re-homed.

It is recommended that GWIC not impose a puppy bond either now or at any time when breeding numbers are under control.

5. GREYHOUND RACING NEW SOUTH WALES' OPERATING LICENCE

ISSUE

Whether the use of an Operating Licence is appropriate.

Whether GRNSW's objectives and functions are appropriate and being actioned effectively.

Whether GRNSW's planning and reporting obligations are sufficient.

Whether governance arrangements for the industry are appropriate.

Whether industry and government arrangements for distribution of dividends to the greyhound industry are fair or appropriate.

Fixing inherent inequity for the greyhound industry arising from fixed RDA and Tax Parity distributions, and the unreasonable mirroring of RDA shares in POCT distributions.

DISCUSSION

1. GRNSW is satisfied that the control of its function by way of an Operating Licence is currently appropriate, but notes a broader movement by Australian governments to a "Principles Approach" as opposed to a "compliance approach".
2. In due course, GRNSW would be happy to transition to such a Principles Approach. This would create a better focus on achievement of broad aims and goals, not box-ticking "proof" of compliance with fixed terms of an Operating Licence.
3. The exercise of GRNSW's functions under the Act requires authorisation by an Operating Licence granted to GRNSW by the Minister. The Act requires GRNSW to exercise its functions in accordance with the Operating Licence.

4. The Act empowers the Minister:
 - i. to grant the Operating Licence on terms set by the Minister including the term of the Operating Licence and the conditions to be included in the Operating Licence;
 - ii. to renew the Operating Licence;
 - iii. to amend, suspend or cancel the Operating Licence granted to GRNSW. In the event that the Operating Licence is not renewed or is suspended or cancelled a regulation must be made for, or with respect to, the exercise of the functions of GRNSW under the Act by a specified person or body and the transfer to that specified person or body of any of the assets, rights and liabilities of GRNSW to the extent they relate to those functions.
5. The current Operating Licence granted by the Minister is for a term of five (5) years and is due to expire on 3 July 2022 subject to the power of the Minister to amend and/or renew the Operating Licence.
6. The terms of the Operating Licence essentially mirror the provisions of the Act that provide for the functions of GRNSW, the obligations of GRNSW under the Act and the Regulation and the powers of GRNSW in relation to governance of greyhound racing clubs.
7. An analysis of the appropriateness of the terms of the Operating Licence requires an examination of the performance of GRNSW against its functions under the Act and any additional obligations imposed on GRNSW under the Operating Licence.
8. The principal objectives of GRNSW are as follows –
 - (a) to be a commercially viable entity,
 - (b) to exhibit a sense of social responsibility by having regard to the welfare of greyhounds,
 - (c) to promote greyhound racing in the State as a competitive and sustainable industry with a high level of public trust.

9. GRNSW has the following functions:

- (a) to conduct greyhound race meetings or authorise greyhound race meetings to be conducted by greyhound racing clubs,
- (b) to allocate the dates on which, and the licensed racecourses at which, greyhound race meetings may be conducted,
- (c) to register greyhound racing clubs,
- (d) to develop safety standards for licensed racecourses,
- (e) to distribute money received as a result of commercial arrangements required by the *Totalizator Act 1997*,
- (f) to fund the costs of the Commission,
- (g) to manage greyhound adoption programs,
- (h) to initiate, develop and implement policies conducive to the promotion, strategic development and commercial viability of the greyhound racing industry in the State,
- (i) to direct and supervise the dissolution of a greyhound racing club that ceases to be registered,
- (j) to appoint an administrator to conduct the affairs of a greyhound racing club,
- (k) to order an audit of the books and accounts of a greyhound racing club by an auditor nominated by GRNSW,
- (l) to scrutinise and approve the constitutions of greyhound racing clubs to ensure they conform to any applicable Act and the rules and that they clearly and concisely express the needs and desires of the clubs concerned and of greyhound racing generally,
- (m) any other functions conferred or imposed on GRNSW by an Operating Licence granted to GRNSW or under this or any other Act or law.

10. Since the commencement of the Act, GRNSW has met its obligations and performed its functions in accordance with its strategic vision as set out in its *Strategic Plan 2018 – 2021* to ensure that the industry is responsible, competitive and sustainable.

11. Through its welfare initiatives, track improvements, and commercial operations, GRNSW has ensured that the industry has stepped up to its objectives as set out in the Act. The success of such initiatives is reflected in numerous ways including the increasing number of greyhound adoptions, the operation of GAP facilities in metropolitan and regional areas, the education of industry participants, as well as flagship events such as the Million Dollar Chase.

12. GRNSW submits:

- i that its objectives and functions are appropriate, and being actioned effectively. This is borne out in its annual reporting to the Minister and through its implementation of its published Strategic Plan; and
- ii that its planning and reporting obligations are sufficient and do not require amendment. Again, that is borne out through its annual reporting to the Minister and via the implementation of its Strategic Plan; and
- iii that governance arrangement for the industry are appropriate; and
- iv that the one thing that requires urgent government attention is the funding arrangement both to GRNSW and GWIC.

Are the current funding arrangement appropriate?

13. The current funding arrangement is not appropriate.

14. The current funding arrangements improperly and directly deprive the NSW greyhound industry of funds, reducing the ability to extend and improve on the already substantial reforms undertaken by GRNSW.

15. It should be noted that GRNSW is the designer, funder and deliverer of all “boots on the ground” greyhound welfare programs in NSW. GRNSW desires to continue in this role, and to expand both the breadth and scope of such programs.
16. The Recommendations of the Greyhound Industry Reform Panel of February 2017 included a stated intention that:
If they [the Recommendations] are implemented, it will mean:
 - (a) *A new governance framework will be put in place that builds public trust in the integrity of the greyhound industry and sets the benchmark for all other jurisdictions.*
 - (b) *The NSW greyhound racing industry will be subject to strict animal welfare regulations with no tolerance for animal cruelty.*
 - (c) ***The industry will be self-sustaining and meet the costs of greyhound racing including the new governance and animal welfare arrangements.***
 - (d) *Progress will be reviewed after two years with an expectation that improved data should allow a specific target to be put in place for unnecessary euthanasia. A full statutory review would not occur until at least three years after the legislation is commenced.*

[our emphasis]
17. GRNSW has five sources of funding:
 - i TAB-derived revenue distributed via the Inter-code Deed (RDA);
 - ii Tax Harmonisation (Tax Parity) distributions;
 - iii Point of Consumption Tax (POCT) distributions; and
 - iv Race Field Information Use Fees (RFIU) income;
 - v Modest non-wagering revenue.
18. It is well-known that distributions via the first three income streams are inequitable. They are so because the distributions from each of those streams are not market-aligned, and instead are either rooted in outdated agreements (RDA), or have suffered from some arbitrary assignment of distribution (Tax Parity), or the arbitrary and inequitable mirroring of the RDA split (POCT).
19. With regard to the fourth income source, RFIU Fees, income is artificially limited and the market distorted by an arbitrary cap on RFIU Fees that is unique to NSW.
20. It is directly within the power of government to fix the inequity problems with Tax Parity and POCT distributions, and to lift the cap on RFIU fees.
21. The unfortunate original source of the Tax Parity and POCT inequity is the RDA which sets out what Tabcorp is required to pay the industry, with the RDA distribution to each of the three racing codes calculated according to formulas set out in the 1998 Inter-Code Agreement (ICA). Under this agreement, funding is distributed between the three racing codes according to fixed percentages that, in 1998, represented the then market share (or popularity) of each racing product. Under this agreement Greyhound racing receives only 13% of the available funds.
22. Since that time, Greyhound racing has grown to be the second most popular racing product in NSW behind thoroughbred racing. GRNSW has a NSW TAB market share of 21.51% in FY2020.
23. In other words, greyhound racing is directly responsible for 21.51% of the RDA funds, yet actually gets just 13%. Flowing from that, 8.51% of the whole RDA funding “pie” is unfairly redistributed to other codes.

24. As the RDA runs for 99 years, this iniquitous funding arrangement improperly deprives GRNSW and the industry of substantial income, and leaves GRNSW with very little opportunity to influence and grow funding through NSW TAB distributions. The lost income is income that would otherwise be used to fund GWIC and GRNSW world- leading animal welfare programs.
25. From 1 January 2019 the NSW government introduced a 10% Point of Consumption Tax (POCT). The distributions to the industry from POCT were based on the RDA fixed percentages: that is, GRNSW receives only 13%. This amount does not reflect the growth or popularity of greyhound racing as a betting product in NSW and did not reflect the funding requirements of establishing and operating a separate independent commission to manage welfare and integrity (GWIC). Greyhound racing is the only racing body in NSW to have a separate entity manage integrity and welfare.
26. In the Financial Year 19/20, this ongoing inequity has resulted in direct lost revenue to GRNSW of \$29,626,005.
27. A summary of the inequity situation is as follows:

GRNSW FUNDING SHORTFALLS DETERMINED FROM MOST UP-TO-DATE NUMBERS AND RELATIVE MARKET SHARE

18/19		RDA / Inter Code Deed		TAX PARITY				POCT	
Total TAB Income	\$34,244,576			GRNSW Tax Parity Receipts	\$5,622,095			GRNSW 18-19 FY POCT receipts	\$2,317,329
GRNSW Share of Distribution	13%			GRNSW Share of Distribution	10%			GRNSW Share of POCT Receipt Distribution	13%
RDA Funding for distribution	\$242,496,651			Tax Parity Pie	\$56,220,950			Total redistributed to Racing = 2% GGR from WSP in NSW	\$17,825,608
Market Share	21.95%	\$53,228,015	\$18,983,439	Market Share	21.95%	\$12,340,499	\$6,718,404	Total GGR of WSP's in NSW determined by GRNSW Payments	\$891,280,385
								POCT Tax applied at 10% of GGR	\$89,128,038
2018/19 FUNDING SHORTFALL		\$27,297,234		Market Share:		21.95%	\$3,912,721	\$1,595,392	

19/20		RDA / Inter Code Deed		TAX PARITY				POCT	
Total TAB Income	\$33,200,321			GRNSW Tax Parity Receipts	\$6,172,603			GRNSW 19-20 FY POCT receipts*	\$5,787,499
GRNSW Share of Distribution	13.29%			GRNSW Share of Distribution	10.0%			GRNSW Share of POCT Receipt Distribution	13.0%
RDA Funding for distribution	\$227,687,831			Tax Parity Pie	\$61,726,030			Total redistributed to Racing = 2% GGR from WSP in NSW	\$44,519,223
Market Share	21.51%	Inequity	\$18,732,753	Market Share	21.51%	\$13,277,269	\$7,104,666	Total GGR of WSP's in NSW determined by GRNSW Payments	\$2,225,961,154
								POCT Tax applied at 10% of GGR	\$222,596,115
2019/20 FUNDING SHORTFALL		\$29,626,005		Market Share**		21.51%	\$9,576,085	\$3,788,586	

Note: GRNSW TAB RDA revenue and subsequent code splits exclude Trackside and Phumelela Gateway International (PGI) revenues.

*GRNSW POCT Forecast based on first three-quarters actual receipts and fourth quarter estimated receipts.

**GRNSW advises that the actual POCT market share from leading corporate bookmakers in 2019-20 ranges between 23.33% and 36%. This is higher than the greyhound code market share used in this analysis.

28. GRNSW has been invited to make submissions to NSW Treasury in relation to an upcoming Treasury review of POCT arrangements. A further detailed examination of all POCT arrangements and distribution distortion will also be made in that submission.

29. GRNSW entirely endorses the views expressed by the Australian Government Productivity Commission on this issue in its *Report on Australian Gambling Industries* (2010) (Part 16.24):

Ideally, the share of TAB payments should correspond to the proportion of wagering turnover derived from each code of racing. However, in between review periods, these inter-code agreements can lead to an inappropriate allocation of funding if the share of wagering that takes place on one code of racing changes, relative to the other two (or if agreements are entered into that do not properly reflect market share in the first place). For example, greyhound racing accounts for 17 per cent of wagering turnover, but the industry receives only 13 per cent of the total payments made by the New South Wales TAB to the three racing codes. The greyhound racing industry estimates that:

... over the past 11 years because of the inequities of this arrangement, they have subsidised thoroughbred and harness racing in New South Wales by the tune of \$92 million. (sub. 248, p. 7)

Note: The wagering turnover percentage in the Report was for that year, 2010. It is now more iniquitous at 21%.

30. The inequity addressed by the Productivity Commission continues unabated even a decade later. In FY20, the same factor criticised by the Productivity Commission will cost the greyhound industry \$18,732,753; the three distortions together – RDA/TAB, Tax Parity and POCT – will cost the greyhound industry \$29,626,005 in FY20 alone.

31. The *Greyhound Racing Act* 2017, the GRNSW Operating Licence and the NSW Government's *Ministerial Statement of Expectations* all refer to GRNSW's obligation to ensure that it is a viable commercial entity and to promote the greyhound racing industry as a sustainable one. However, faced without access to a fair share of funding under POCT (and other industry-derived revenues) it follows that GRNSW is artificially hampered from sustainably funding the industry, GWIC and the important welfare programs both actual and planned. Accordingly, GRNSW makes the following recommendations:

RECOMMENDATION

It is submitted that the terms of the Act and the Operating Licence be amended to delete the requirement that GRNSW fund the Commission.

That distributions to GRNSW from TAB revenue via the RDA, and Tax Parity, and POCT should be reformed to fairly reflect the market contribution greyhound racing makes to the raising of those revenue streams.



6. THE FUNDING AND EFFICIENCY OF THE GREYHOUND WELFARE AND INTEGRITY COMMISSION (GWIC)

ISSUE

If GWIC's legislative objectives and functions are appropriate and being actioned effectively or efficiently.

If GWIC's planning and reporting obligations are sufficient.

If the current funding arrangements for the industry are fair and appropriate.

Whether there is any or adequate oversight of GWIC annual operating budgets.

DISCUSSION

1. As threshold points, GRNSW accepts that:
 - (a) GWIC's legislative objectives and functions are appropriate;
 - (b) GWIC performs an important and necessary role in the matrix of greyhound racing;
 - (c) That GWIC's planning and reporting obligations are sufficient insofar as they relate to government.
2. However, GRNSW's position is that GWIC in its current form is too big, too expensive and logistically inefficient.
3. GRNSW submits that, for reasons set out below:
 - (a) GWIC's costs remain too high for the services delivered;
 - (b) GWIC ought to be subject to direct Treasury oversight as to its budget and efficiency;
 - (c) The funding arrangement between GRNSW and GWIC is not ideal in its current form; and
 - (d) In lieu of the current arrangement, GWIC's costs should be funded directly by government.

Effective Action for Participants

4. Whilst GRNSW accepts that GWIC's functions are appropriate, it is concerned by:
 - (a) the lack of a Customer Service Level Agreement, which is necessary to reduce delay in the processing of transfers, registrations, naming and other basic administrative functions required by participants and the timely provision of statistics by GWIC to GRNSW;
 - (b) the significant waste of industry funds expended by GWIC in the unnecessary duplication of industry IT, instead of building on the very capable infrastructure already in place;
 - (c) Failure to yet establish greyhound lifecycle tracking; and
 - (d) Excessive staffing levels and inefficient staff arrangements leading to unnecessary costs.

A Unique Funding Model

5. Under the current terms of section 24(1)(f) of the Act, GRNSW is required to directly fund the costs of the Commission.
6. That current statutory provision is contrary to recommendation 47 of the Greyhound Industry Reform Panel ("GIRP"), which advised that GWIC's budget "should be based on the efficient cost of performing its functions and it should seek annual funding from the consolidated fund via normal State budgetary processes."
7. Thus, GWIC is the subject of a funding arrangement that is both contrary to the recommendations of the GIRP, and unique amongst NSW government agencies. That is, instead of being funded either entirely from general revenue or by special appropriation, GWIC enjoys an indemnity for its costs from a commercial entity, GRNSW, without GRNSW having any power to require efficiencies.

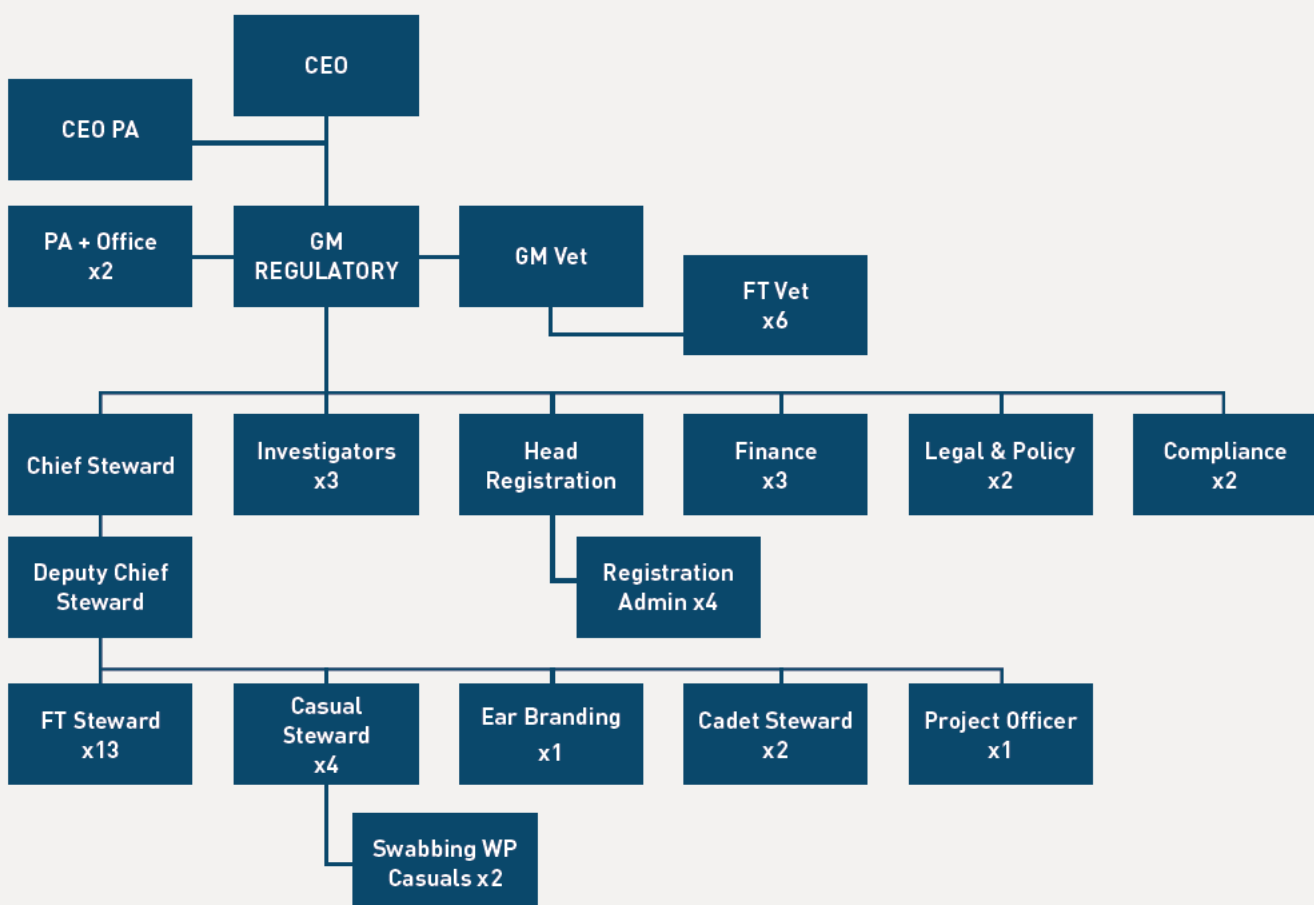
8. The effect of the unique GWIC funding model is that GWIC has little Treasury oversight into how many people it employs, how much money it spends, or what it spends it on. The cost burden, whatever it happens to be, efficient or otherwise, is simply imposed upon the commercial operator GRNSW, and thus on all greyhound participants.
9. The unique funding arrangements have protected GWIC from being required to provide productivity dividends, unlike nearly every other State agency.

Benchmarking the Costs of GWIC

10. GWIC is disproportionately expensive when benchmarked against other jurisdictions and other similar integrity bodies.

11. GWIC is operating a model that costs approximately 50% more to run than it should. According to its own 2019 *Annual Report*, GWIC has more than 70 non-executive staff, staffing costs of more than \$8.8 million and total expenditures of \$15.7 million.
12. GWIC's budget projections for FY2021 have staff costs at \$10.49 million out of a total budget of \$16.697 million.
13. GRNSW proposes that with efficient management and staffing measures introduced, GWIC could efficiently and properly deliver all of its functions with 52 staff, and at a total annual cost of \$11.9 million.
14. Below is an organisation structure which GRNSW proposes would allow GWIC to function efficiently and fulfil all of its legislative objectives and functions at an appropriate cost:

GWIC - A proposed efficient organisation chart



15. Set out below is a costing of a better GWIC business model. The model is based on actual salaries and costs paid by GWIC pursuant to the relevant NSW *Crown Employees Award* and SOORT Determinations. The table excludes Commissioner remuneration.

GWIC ORG STRUCTURE	
ROLE	TOTAL
CEO	350,850
CEO PA	100,000
PA Office 1	75,000
PA Office 2	75,000
GM Regulatory	298,223
GM VET	298,223
Full Time Vet 1	164,690
Full Time Vet 2	164,690
Full Time Vet 3	164,690
Full Time Vet 4	164,690
Full Time Vet 5	164,690
Full Time Vet 6	164,690
Chief Steward	179,000
Deputy Chief Steward	147,770
Full Time Steward 1	129,962
Full Time Steward 2	129,962
Full Time Steward 3	129,962
Full Time Steward 4	129,962
Full Time Steward 5	129,962
Full Time Steward 6	117,691
Full Time Steward 7	117,691
Full Time Steward 8	117,691
Full Time Steward 9	117,691
Full Time Steward 10	98,878
Full Time Steward 11	98,878
Full Time Steward 12	98,878
Full Time Steward 13	98,878
Casual Steward 1	40,000
Casual Steward 2	40,000
Casual Steward 3	40,000
Casual Steward 4	40,000
Swabbing 1	25,000
Swabbing 2	25,000
Cadet Steward	81,865
Cadet Steward	81,865
Ear Branding	87,713
Investigators 1	140,340
Investigators 2	140,340
Investigators 3	140,340
Head Registration	120,000
Registration Admin 1	95,000

Registration Admin 2	95,000
Registration Admin 3	85,000
Registration Admin 4	85,000
Finance 1	130,000
Finance 2	87,500
Finance 3	87,500
Legal & Policy 1	270,000
Legal & Policy 2	160,000
Compliance 1	100,000
Compliance 2	100,000
Compliance 4	100,000
Total	6,425,755

Consideration

IT	180,000
Admin Vets	70,000
Media	100,000
HR	140,000
Project Officer	140,000
Total	630,000
Total	7,055,755

SUPPLIER EXPENSES	
Advertising & Promotion	30,000
Assets Purchase	28,000
Audit Fees	45,000
Consultant	178,000
Consumable and Stores	80,000
Contractors	60,000
Education Training	73,000
Electricity	12,000
Freight & Postage	78,000
Insurance	30,000
External Legal Fees	250,000
Memberships (Professional)	9,000
Motor Vehicle Expenses	366,000
Phone & Internet	126,000
Printing	71,000
Property & Maintenance	37,000
Property Rent	261,000
Software & Software Support	782,000
Stationery & Office Supplies	18,000
Swabbing & Drug Detection	1,795,000
Travel	498,000
Vet Supplies	55,000
Others	29,000
Total	4,911,000

IDEAL MODEL -V- ACTUAL GWIC FY 2020/21			
DETAILS	GRNSW	GWIC BUDGET	POTENTIAL SAVINGS
Employee related cash expenses	7,055,755	10,490,000	3,434,246
Supplier cash expenses	4,911,000	6,207,000	1,296,000
Total	11,966,755	16,697,000	4,730,246

16. As a like-for-like example, Greyhound Racing Victoria (GRV) regulates more participants, more dogs, more pups, more race meetings, more races, more starts, more substance testing swabs, more wagering revenue, and more prizemoney paid to participants than NSW, but efficiently manages to do so on a FY19 budget of \$10.836 million compared to GWIC's FY19 budget of \$15.7 million.

2018-19		
	NSW	VICTORIA
Integrity costs	\$15.7m (GWIC)	\$10.8m
Prizemoney paid	\$37.7m	\$46.5m
Wagering revenue	\$59.4m	\$96.9m
Race meetings	1,153	1,189
Total races	11,399	13,777
Number of starters	81,282	102,706
Swabs taken	7,964	12,400
Positive/irregular swabs	34	64
Registered trainers	2,200	2,500
Litters whelped	536	698
Pups registered	3,747	4,533
Tracks	32	13

GAP RE-HOMING AND WELFARE		
	GRNSW	GRV
Dogs rehomed through GAP program	720	987
GAP costs including employee expenses	\$2.774m	\$4.101m
Welfare costs including employee expenses	\$833,048	\$1.361m

GWIC V GRV REPORTED INTEGRITY COSTS	
GWIC	GRV
\$15.7 million	\$10.836 million
Reported as including \$8.8m Employee Expenditure The breakdown is listed in cost centres: \$5.230m Race Day Regulatory Function, \$2.819m Unattributed Corporate Services \$2.707m Delivery of Participant Services, \$2.290m Compliance and Enforcement, \$1.633m Prohibitive Substance Detection, \$632,000 Reform Development and Implementation \$345,000 Information and Education	Reported as: \$7.643m Stewards, integrity and welfare inspectors and employees \$2.268m Swab analysis \$371,000 Legal & Appeals expenses \$130,000 Ear branding and micro-chipping \$4,000 research \$420,000 other integrity initiatives

17. Any comparisons GRNSW has made between GWIC and GRV relating to integrity have been based on actual reported figures in respective FY18-19 Annual Reports and direct correspondence with GRV executive management to clarify costs and functions on a like-for-like basis.
18. The \$10.8m figure spent by GRV on Integrity in FY18-19 is net of Greyhounds As Pets (GAP) and other industry-led welfare programs and their associated costs. In NSW, those programs are run and funded by GRNSW. GRV spent a further \$4.1m on GAP and \$1.36m on other welfare (total \$5.46m) in FY18-19. In NSW, comparative costs on GAP and welfare, which are paid by GRNSW, totalled \$3.6m in FY18-19, and \$4.88m in FY20. In effect,

GRNSW and GRV now spend similar amounts on GAP and welfare re-homing programs, but there remains a significant difference between the States on direct integrity costs.

19. As emphasised, GRV has a significantly larger industry to govern in terms of participants, animals and total racing events. GRV is able to pay for this with significantly greater revenue derived from more favourable wagering returns under Victorian government and commercial wagering agreements than is afforded the greyhound industry in NSW. GRV is not suffering from the same POCT/TP/RDA inequity to which GRNSW is subject.
20. In response to participants' concerns about burgeoning and unnecessary costs, GWIC has publicly sought to justify its expenditure, stating that NSW is larger geographically and has a greater number of tracks. Geographic area and number of tracks are the only two relevant metrics by which the NSW greyhound industry is "bigger" than Victoria. The number of tracks is quite irrelevant from a cost perspective. It is not the number of *racetracks*, but the number of *race meetings* that is the multiplier for direct racing costs. It is *race meetings* to which GWIC deploys stewards and vets, not *racetracks*. In that regard, Victoria has more race meetings, more races, and more starters in those races.
21. With regard to the geographic size of NSW: Having tracks spread across a more expansive geography is, from a cost-of-integrity perspective, only a logistical challenge of rostering and hiring to suit the locations of each track. Any additional travel that is unavoidable in NSW – if compared with Victoria – has been experienced by GRNSW in all its current duties and previously when overseeing integrity functions. Hence, any appropriate cost base proposed by GRNSW in regard to GWIC budgets is made fully understanding this aspect.
22. As an alternative comparison, it is illustrative to benchmark GWIC against other NSW integrity commissions. For a FY19 staff budget of \$14.993 million, the NSW Law Enforcement Conduct Commission oversees integrity of the 21,080 employees of the NSW Police. (Source: LECC *Annual Report* 2019)

23. As a further integrity-type comparative analysis, in FY19 the NSW Independent Commission Against Corruption spent \$19.621 million on staff overseeing more than 500,000 politicians, councillors and public-sector employees across NSW. (Source: ICAC *Annual Report* 2019)
24. GRNSW operates racing across NSW with 52 people, yet GWIC employs 72 staff to regulate it.
25. It is GRNSW's strong view that the finite funds available ought to be spent wisely, and allocated to the re-homing side of welfare and the "boots on the ground" operations of GRNSW to care for greyhounds during the racing to re-homing lifecycle rather than on increased policing and compliance-type welfare, when those latter functions are already more than adequately funded.

RECOMMENDATION

PREFERRED "FIXED" MODEL RECOMMENDATION:

That distributions to GRNSW from all of TAB revenue via the RDA, and Tax Parity, and POCT should be reformed to fairly reflect the market contribution of greyhound racing to the raising of those revenue streams, and if that is achieved, that GRNSW should remain responsible through government for paying GWIC's *reasonable* operating costs;

OR, IN THE ALTERNATIVE:

That GRNSW's statutory obligation to fund the operating costs of GWIC be removed from both the Act and Operating Licence, and that GWIC's operating costs be funded directly by government, either

- (a) in full from the consolidated fund via normal State budgetary processes; or
- (b) by a special appropriation under section 130 of the *Betting Tax Act 2001*, whilst preserving the current 13% POCT distribution made to GRNSW.

7. THE TARGET DATE FOR UNNECESSARY EUTHANASIA

ISSUE

The appropriateness of a target date for achieving zero unnecessary euthanasia of greyhounds.

DISCUSSION

1. As required by clause 14(b) of the Operating Licence, GRNSW has reported to the Minister on progress made and additional options for breeding controls and other total lifecycle initiatives including a target date of 1 July 2023 for achieving zero unnecessary euthanasia of greyhounds.
 2. GRNSW has instituted the following programs to achieve zero unnecessary euthanasia:
 - i. The introduction and funding of the Race Injury Rebate Scheme to provide assistance with medical costs for greyhound racing injuries and to ensure that a seriously injured greyhound receives appropriate veterinary care and treatment;
 - ii. The expansion of GRNSW's Greyhound As Pets program to improve regional rehoming of greyhounds which has resulted in an increase in the number of greyhounds rehomed under the GAP program via rehoming initiatives;
 - iii. Modifying support schemes for greyhound owners and other rehoming agencies to facilitate an increase in rehoming of greyhounds via those channels.
- The recently introduced Homing Assistance Scheme provides greyhound owners with a financial rebate of up to \$950 for NSW industry participants who have retired their greyhounds and are preparing them for life as pets in their own home, with friends or family or through GAP and other approved rehoming organisations. This new single scheme amalgamates the former Owner Incentive Scheme, Desex and Dental Scheme and non-participant rehoming schemes into one easy rebate scheme;
- iv. Monitoring whelping numbers to ensure a sustainable greyhound racing industry whilst at the same time having regard to whole-of-lifecycle initiatives for greyhounds following their racing career and suitability for rehoming through GRNSW's GAP program;
 - v. Racetrack maintenance programs that assist in reducing on-track injuries;
 - vi. Research into racetrack design and the development of minimum standards for racetracks by GRNSW as required by the provisions of the Operating Licence; and
 - vii. The purchase of a world-first farm-stay facility in the Hunter Valley to provide retired greyhounds an environment for their optimal development as part of GRNSW's strategic vision and responsibility to the industry in the area of animal welfare.
- The farm-stay will also provide additional rehabilitation opportunities for greyhounds as a pathway to adoption and enable greyhounds that are not yet ready for adoption to be housed in a safe and supportive environment.

3. As reported by GRNSW in its 2018/19 Annual Report and elsewhere in these submissions, there has been an increase in the number of greyhounds rehomed under GRNSW's Greyhounds As Pets program and through GRNSW's rehoming initiatives.
4. GRNSW's ability to fund desirable welfare and sustainability initiatives is constrained by tax revenue distribution inequities that had their genesis in the RDA, and have been replicated in Tax Parity and POCT initiatives. These are referred to in detail earlier in this submission, but a correction/balancing out of these inequities will without doubt lead to better animal welfare outcomes for both racing and retiring greyhounds.

RECOMMENDATION

It is recommended that in order to assist GRNSW with achieving the target date that there be an increase in funding for GRNSW's welfare initiatives.

Specifically, there should be funding granted for the initial and continued operation of the Farm-stay program as it is projected that GRNSW's expenses, including those of a capital nature, will be substantial.



8. COMPLIANCE AND ENFORCEMENT POWERS, AND PENALTIES AND OFFENCES

ISSUE

If animal welfare offence policing is contributing positively to behavioural change in the industry.

If the range of penalties and offences are practical and effective at deterring bad behaviour, or if they can be improved.

If the Commission's investigative and enforcement powers are sufficient to effectively regulate the industry.

DISCUSSION

1. There is no question that the sanctioning of participants who commit animal welfare offences contributes positively to animal welfare outcomes. Deterrents are one important part of the matrix underlying attitudinal and behavioural change within the industry.
2. There are compliance and enforcement powers available to GRNSW under the Act in relation to the proper governance of greyhound racing clubs.
3. GWIC has broad ranging disciplinary action powers to commence an inquiry into any matter related to the greyhound racing industry.
4. GWIC also has the power to appoint inspectors of their own choosing who have certain powers of entry and powers to require information and records.
5. The Act empowered the Commission to make rules (**Greyhound Racing Rules**), not inconsistent with the Act or the *Greyhound Racing Regulation 2019* (NSW) (the Regulation), for or with respect to any matter relating to greyhound racing.
6. The Greyhound Racing Rules impose several obligations on greyhound racing participants concerning matters relating to greyhound welfare including the following:
 - (a) the trainer and/or handler must ensure that greyhound be in proper condition for racing (Rule 32);
 - (b) where a greyhound is presented for an event the steward at the time shall cause the greyhound to be examined by a veterinary surgeon or authorised person to determine that the greyhound is fit to compete and, in the case of a bitch, is not in season (Rule 37(1));
 - (c) rules in relation to the duties of a person (a trainer or owner) keeping greyhounds including reporting to the controlling body a greyhound that has a reportable disease (Rule 105A) and rules relating to the proper care and welfare of greyhounds (Rule 106); and
 - (d) requiring the registration of a greyhound with the local Council under the *Companion Animals Act 1998* (NSW) where a greyhound ceases to be registered as a greyhound for the purposes of racing or breeding under the provisions of the Greyhound Racing Rules and/or the Act, as amended from time to time.
7. A person may be charged for breaching the Rules and certain penalties imposed on that person including by way of a fine or suspension.
8. The Act also requires the Commission, in consultation with GRNSW and such other persons or bodies as the Commission considers appropriate, to prepare a code of practice relating to the welfare of greyhounds (**Code of Practice**) including standards that promote the welfare of greyhounds and are consistent with the objects of the *Prevention of Cruelty to Animals Act 1979* (NSW).

9. On 1 July 2020 the NSW Government published the NSW Greyhound Welfare Code of Practice (**New Welfare Code**) which will commence on 1 January 2021.
10. Pending the commencement of the New Welfare Code, the Code of Practice for the Keeping of Greyhounds in Training and the Code of Practice for Breeding, Rearing and Education of Greyhounds applies to persons involved in training greyhounds and persons who breed, rear or educate greyhounds in NSW.
11. A breach of the current Codes of Practice may result in the imposition of a penalty under the Greyhound Racing Rules. The maximum penalty that may be imposed is \$22,000 or suspension, disqualification or cancellation of registration.
12. The *Prevention of Cruelty to Animals Act 1979* (NSW) also provides for a number of animal cruelty offences and associated penalties where such offences have been committed.
13. The recent enactment of the Regulation in 2019 introduced a number of penalty notice provisions for offences committed under the Act relating to the contravention of the Code of Practice, matters related to the keeping of greyhounds on certain premises, registration requirements for greyhounds, registration of greyhound racing industry participants, greyhound racing clubs and tracks (including trial tracks), procedures at inquiries and restrictions on entry into restricted access areas at a licensed racecourse or greyhound trial track.
14. The Act provides the Commission with investigative powers including the ability to conduct an inquiry, at its own initiative, into any matter relating to the greyhound racing industry.
15. The Act also provides the Commission the ability to take disciplinary action against or in respect of a relevant person if the Commission is of the opinion that the person:
 - (a) has contravened a provision of this Act, the Regulations, the Code of Practice or the Greyhound Racing Rules, or
 - (b) is not a fit and proper person to be registered (having regard in particular to the need to protect the public interest as it relates to the greyhound racing industry).
16. The Act gives GRNSW the ability to take disciplinary action against greyhound racing clubs if it is of the opinion that:
 - (a) the club has contravened a provision of this Act, the Regulations, the Code of Practice or the Greyhound Racing Rules, or
 - (b) the club has failed to comply with a direction given by GRNSW to the greyhound racing club under the Act or a minimum standard set by GRNSW under the Act.
17. GRNSW cannot take any disciplinary action without first giving the greyhound racing club concerned notice in writing of the proposed action and a reasonable opportunity to be heard and to make submissions about the matter.
18. There is scope to streamline the processes of Inquiry and Enforcement. For example, prohibited substance offences are offences of strict liability. It is GRNSW's experience that the concept of strict liability is often not fully appreciated by participants. A further education program about the obligations would likely result in increased vigilance by participants, a reduced occurrence of breaches, and a lower level of contest against charges when a breach is detected.

19. In other words, if participants better understood by explanation from the regulator that there is generally no defence to a prohibited substance charge, the administrative process of finalising such matters would be foreshortened.
20. Along with the above, it is worth noting that of the 7,964 swabs taken for testing in FY19, only 34 were positive/irregular, and of those, by far the majority were not for actual performance-enhancing drugs. A recurring theme in substance detection is the number of relatively benign substances that have ended up on the Prohibited Substance list for greyhounds. These include the perennial cobalt, arsenic found in fish and calcium in various forms.
21. GRNSW suggests that, in the absence of benign substances being removed for the Prohibited Substance list, consideration ought to be given to breaches in relation to those substances being dealt with quite differently than the far-more-rare breaches for actual performance enhancing drugs. For example, the benign substance offences (as well as low level offences not related to prohibited substances) might be resolved efficiently by way of enforceable undertakings that could be negotiated early and efficiently after detection. Such enforceable undertakings are now used widely in various other NSW jurisdictions in lieu of penalties, with a view to driving behavioural change.
22. Anecdotal evidence, and GRNSW's experience, suggest that there has been a real reform to industry-wide participant thinking; that there is a prevailing sense of recognition that a well-regulated industry will be an industry that enjoys the confidence of the public, and a "social licence". GRNSW submits that replacing penalties with enforceable undertakings where appropriate could be a further driver of cultural change.

RECOMMENDATION

GRNSW submits that the current investigative and enforcement powers are more than sufficient to regulate the industry.

GRNSW submits that consideration ought to be given to:

- (a) the development of a more efficient, low-cost mechanism for both Steward's Enquiries and Appeals from Decisions; and
- (b) the expansion of the range of censure and penalty options to include enforceable undertakings.



9. THE EXPORT OF GREYHOUNDS

ISSUE

Any impact on the export of greyhounds since the enactment of the Act.

DISCUSSION

1. The number of greyhound exports has decreased significantly since the enactment of the Act. There were 36 approved greyhound exports in 2018- 2019.
2. In 2015, GRNSW commenced an inquiry into the unauthorised export of greyhounds (**Exports Inquiry**) to countries that do not adhere to Australian animal welfare standards.
3. The Export Inquiry handed down a number of decisions and penalties, including fines and or suspensions, for breaches of the Greyhound Racing Rules in the context of the Exports Inquiry. Those decisions have been published and are available on GRNSW's website.
4. One of the learnings of the Export Inquiry was that it was possible to export a greyhound in compliance with Australian law, albeit without a Greyhound Passport. With support from GRNSW, in December 2017 Greyhounds Australasia (GA) amended the relevant Rules to make it an offence for greyhound racing participants to transfer ownership of greyhounds in circumstances where that participant knows, or ought to know, there is no Greyhound Passport issued for the greyhound. This appears to have essentially stopped the export of greyhounds.
5. GRNSW remains committed to prosecuting any breaches of the Greyhound Racing Rules in the area of greyhound exports.
6. At the same time as supporting the current proper regime of regulating export of greyhounds, GRNSW supports the responsible export and import of animals for breeding, racing and pet purposes. The industry should not be restricted or discouraged from export of animals to countries with acceptable animal welfare practices.

RECOMMENDATION

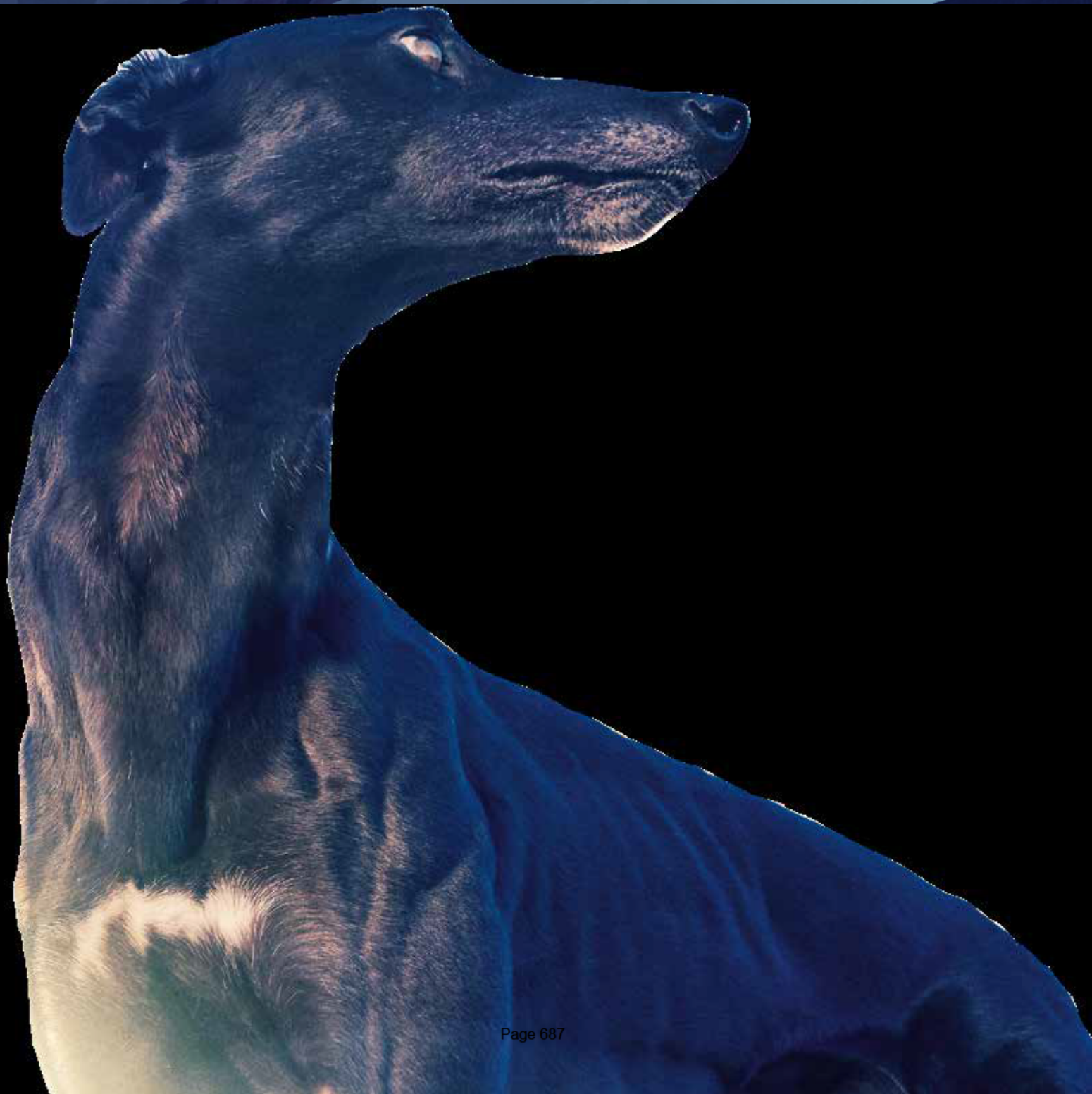
The problem has been adequately addressed nationally by Rule-changes and enforcement by each State body.

The problem that was properly identified is now non-existent.

To the extent that there needs to be any future amendment to the regime of export regulation, it ought to be national and uniform. GA is the peak body for greyhound racing in Australia. GA sets the rules at a national level and issues greyhound passports. It follows that any regulatory change in respect of the export of greyhounds should be done at a national level through GA, with any changes then subsequently endorsed by each State greyhound regulatory body.







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2019 ANNUAL REPORT

CHAIRPERSON'S REPORT



As the recently appointed Chair of Greyhound Racing NSW (GRNSW), I am pleased to deliver this report covering the period from 1 July 2018 to 30 June 2019. In doing so, I acknowledge the outstanding contribution to the organisation and the industry more broadly of my predecessor, the Hon Morris Iemma, who was Chair for the entirety of the reporting period.

In his stewardship of the Board from mid-2017, and his role as head of the Greyhound Industry Reform Panel immediately prior to that, Morris was resolute in putting animal welfare at the heart of greyhound industry reform and establishing a solid framework to promote a sustainable and prosperous future for all participants prepared to support positive change.

With the implementation of GRNSW's new strategic plan having commenced, and the separation of the regulatory and commercial functions of greyhound racing in NSW now complete, Morris leaves the organisation in a much stronger position than when he started. We wish him all the best in his future endeavours.

One of the highlights and best examples of the revival of our industry in 2018-19 was the inaugural staging of the world's richest greyhound event, the Million Dollar Chase. Thanks to the support of the NSW Government and major sponsor Ladbrokes, Wentworth Park played host in October 2018 to a greyhound race that saw the connections of the Dubbo-reared Mystic Riot collect a first prize of \$1 million, an event that would have seemed highly improbable a year earlier.

The Million Dollar Chase Final, which set new wagering and attendance records for greyhound racing in NSW, was the culmination of a race series staged over two months at 12 NSW racetracks, including 11 in regional areas. It provided a high-profile vehicle to promote GRNSW's Greyhounds As Pets (GAP) rehoming program and delivered a tremendous morale boost to all industry participants as an example of what can be achieved if welfare and integrity standards exceed community standards. At the close of the reporting period, planning was well-advanced for the second staging of the Million Dollar Chase. Congratulations go to everyone involved in successfully delivering this amazing event.

As part of significant structural reform, from 1 July 2018 the responsibility for the regulation of greyhound racing, including the oversight and enforcement of matters relating to animal welfare and integrity, was transferred to the newly created Greyhound Welfare and Integrity Commission (GWIC). The establishment of GWIC was key amongst the 122 recommendations of the Greyhound Industry Reform Panel. Some of the specific functions that transferred to GWIC from GRNSW in the past 12 months include the registration of greyhounds and industry participants, and the employment of race stewards, inspectors and veterinary officers.

In addition to funding its operations, GRNSW has worked closely with GWIC through this major industry transition. There is a lot more work to do, and we look forward to providing further assistance to GWIC for the betterment of the industry and collaborating on key initiatives including whole-of-lifecycle greyhound tracking, rehoming, participant training and education, and track safety.

The Greyhound Racing NSW Strategic Plan 2018-2021 (the 'Plan'), which provides a blueprint for our organisation in the new structural landscape, was publicly released on 18 October 2018. The Plan was informed by engagement with a broad cross-section of the industry and other key stakeholders and sets out a bold vision for greyhound racing in NSW to be embraced as socially responsible, world-leading racing entertainment. It is built around three pillars - *Responsible, Competitive, Sustainable* - underpinned by 11 goals and 21 specific initiatives aimed at achieving the highest standards of animal welfare in racing, delivering commercial growth to support jobs and making a meaningful contribution to the communities in which we operate. Progress related to the goals and initiatives in the Plan are included throughout this report.

New track standards and upgrades were a key focus of GRNSW's safety and welfare activities in 2018-19. With the assistance of research and industry partners including the University of Technology, Sydney (UTS), NSW Greyhound Breeders Owners & Trainers Association (GBOTA) and GWIC, GRNSW developed new minimum safety standards for greyhound racetrack design and construction in NSW. The aim of this work is to reduce the number and severity of greyhound racing injuries and on-track euthanasia incidents, which is critical to maintaining industry and community confidence going forward. While the research and the work on track safety is an ongoing, long-term project, it is an area where GRNSW believe tangible benefits are achievable in the near-term. We thank the NSW Government for its \$30 million commitment over five years to support crucial track safety work, which funded track rebuilds at Gosford and Gunnedah in the reporting period.

One of the most pleasing aspects of the 2018-19 year was the increase in the number of greyhounds rehomed over the previous year under GRNSW's GAP program and through our associated rehoming initiatives. Along with the spotlight on the program provided by the Million Dollar Chase event, other key drivers of improvement included:

- A new Regional GAP program to expand its reach
- Additional GAP NSW adoption days and events
- Enhanced partner schemes with other rehoming organisations
- The appointment of Dr Alicia Fuller as General Manager of GAP NSW in May 2019

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- The appointment of Australian sporting star Tim Cahill as GAP NSW ambassador in June 2019.

While the GAP NSW program will continue to be a central focus of GRNSW's commitment to animal welfare across the entire lifecycle of racing greyhounds, the introduction of the Race Injury Rebate Scheme in the past year is also key to improving animal welfare outcomes and preventing unnecessary instances of euthanasia. This scheme provides greyhound owners with the financial support needed to ensure greyhound injuries are treated, including through surgical procedures where required. The Scheme strongly aligns with our pillar to act as a responsible industry.

An Expression of Interest process for the GRNSW Board was conducted late in 2018-19 and resulted in applications from some exceptional candidates with diverse skills and experience. They have since formed a refreshed Board that I am excited to work with in the continued renewal of this important NSW industry. The new board members are Helen Moore, Marissa Cooper and Kevin Gordon, and I look forward to them bringing their combined business and racing industry experience to the organisation. They join Matthew Waring, whom I am delighted will serve another term, and Annette Mullen, who is continuing her current term. And finally, on behalf of the board and executive of GRNSW, I thank outgoing Deputy Chair Yvonne Howie for her tireless commitment to the role over the past two years. We wish Yvonne all the best for the future.

In summary, in 2018-19 GRNSW was the leader for various bold and exciting initiatives that made the world of greyhound racing sit up and take notice of the resurgence of the industry in NSW. I congratulate GRNSW CEO Tony Mestrov and his team for their vision and execution. There remain challenges on the horizon, including the number of racing greyhounds as a result of a downturn in breeding associated with the industry ban in 2016 and changes in the wagering environment that have affected revenue. However, there has never been a better time to be part of the greyhound industry, and I look forward to another year of achievements in 2019-20.

HUGH ARMENIS
CHAIRPERSON

One of the most pleasing aspects of the 2018-19 year was the increase in the number of greyhounds rehomed over the previous year under GRNSW's GAP program and through our associated rehoming initiatives.

”

CEO'S REPORT



Following a year of rebuilding and consolidation in 2017-18, I am delighted to report that 2018-19 was punctuated by a series of positive initiatives and targeted activities that continued the revitalisation of greyhound racing in NSW and contributed to major enhancements in key safety and welfare indicators.

Chief amongst these were the following highlights, which were consistent with the three pillars contained in GRNSW's Strategic Plan 2018-21 – Responsible, Competitive and Sustainable:

- The inaugural staging of the Million Dollar Chase series – culminating in the world's richest greyhound race - which was won by NSW greyhound Mystic Riot and attracted record interest and wagering for greyhound racing in NSW
- The introduction of the Race Injury Rebate Scheme to improve welfare outcomes for racing greyhounds by preventing unnecessary euthanasia and providing greyhounds which are physically healthy and behaviourally sound the opportunity to live out their natural life span as a companion animal
- Strong and appropriate increases in returns to industry participants in the form of additional prizemoney and travel subsidies, with a specific focus on regional areas
- Increased investment in the Greyhounds As Pets (GAP) NSW program, which led to an increase in the number of greyhounds adopted, and the announcement of Tim Cahill as the first GAP NSW ambassador
- The commencement of a series of major track rebuilds and upgrades, and other capital works and safety initiatives, in line with world's best-practice safety design and technology
- A healthy increase in Race Fields Information Use (RFIU) fees, which reflected the growing demand for GRNSW's commercial product from the corporate bookmaker sector.

The inaugural GRNSW + Ladbrokes Million Dollar Chase was conceived in response to industry participants stating a desire to be part of a competitive, responsible and sustainable industry. It proved to be a major success on several fronts.

First, the semi-final and grand final nights at Wentworth Park attracted huge spectator and wagering interest, eclipsing previous single meeting wagering records in NSW in consecutive weeks. Second, the event presented a platform to raise awareness of the GAP NSW rehoming program, which was strongly promoted throughout the series. Third, the use of regional tracks as part of the qualifying series helped to boost club revenues through increased visitation and promotion, improving their sustainability. At the close of the reporting period, plans to expand the presence of regional NSW racetracks for the 2019 Million Dollar Chase were well-advanced with an increase from 11 to 14 regional qualifying and finals meetings programmed.

In order to capitalise on the positive sentiment associated with the Million Dollar Chase, a series of further initiatives to boost industry participation and competitiveness occurred in 2018-19. Most notable among these was the largest increase in prizemoney in NSW greyhound racing history which was announced in June 2019. A record \$33 million will be distributed to participants in 2019-20, with most of the \$3.2 million boost targeted to regional NSW participants. Feature Cup events at the Wagga, Bathurst, Grafton, Goulburn and Dubbo tracks going forward will now be worth a record \$25,000, up from \$10,000. And all winners at provincial clubs in regional NSW (excluding maidens) will now receive \$1,500, up from the current level of \$850.

Of course, million-dollar races and record increases in prizemoney are only possible with complementary enhancements in safety and welfare standards. Following the transfer of the regulatory functions of greyhound racing to the Greyhound Welfare and Integrity Commission (GWIC) on 1 July 2018, GRNSW refocused its safety and welfare efforts in three key areas in 2018-19 – (1) track safety to prevent or minimise injuries; (2) the rehoming of greyhounds at the end of their careers; and (3) the establishment and administration of the Race Injury Rebate Scheme. GRNSW also funded significant costs associated with the establishment and transfer of welfare functions to GWIC, which contributed to an overall net financial loss for GRNSW for 2018-19.

Section 26 of the Greyhound Racing Act 2017 requires GRNSW to set minimum standards with respect to racecourse design and construction. In response, throughout the course of 2018-19, GRNSW continued its association with engineers at the University of Technology, Sydney (UTS) and other industry stakeholders to develop new minimum track standards and procedures that all NSW racetracks will be required to comply with in the future. Furthermore, we increased the level of monitoring and inspections of racetracks across NSW, which resulted on a few occasions in tracks being closed and meetings cancelled until necessary maintenance works were carried out. As part of the application of the new track standards across NSW, GRNSW track co-ordinators increased the level of education available to club track curators and managers on track preparation and maintenance across the year.

Several major track upgrades or capital works programs were also undertaken in 2018-19, including a half million-dollar reconstruction and infrastructure upgrade at Wentworth Park in advance of the Million Dollar Chase finals. Other works included allocations totalling \$1.6 million to rebuild or upgrade racetracks at Gosford, Gunnedah and Tamworth, and air-conditioning upgrades to kennels in Kempsey, Taree and Hastings River to enhance animal welfare outcomes.

It was a year of growth for the GAP NSW adoption program and our associated rehoming initiatives, where together we assisted in the rehoming of more than 700 greyhounds. This was a significant increase on the previous year. But there is a need to do more, and we are committed to broadening the reach and effectiveness of our rehoming initiatives. The expansion of the GAP NSW program to regional areas - which is the beating heart of our industry - and the genuine commitment of new ambassador Tim Cahill to raising awareness of the program bodes very well for the future. I congratulate Dr Alicia Fuller on her appointment as General Manager of GAP NSW and look forward to working closely with her on further welfare initiatives.

On behalf of the executive team and employees at GRNSW, I wholeheartedly thank the Hon. Morris Iemma for his passion, commitment and support as the Chairperson of GRNSW over the past two years. He has helped steer GRNSW from its darkest days towards a very bright future, and we wish him well for his future.

I also congratulate our new Chairperson, Mr Hugh Armenis, and look forward to working with him and the new GRNSW Board as we continue to make strides towards growing a responsible, competitive and sustainable NSW greyhound industry.

TONY MESTROV
GRNSW CEO



SUMMARY OF FINANCIAL PERFORMANCE

The 2018-19 financial year delivered a net loss of \$1,508,237 for GRNSW, a result influenced by a variety of factors including costs associated with the transition of the Regulatory function to the newly established Greyhound Welfare and Integrity Commission (GWIC), a year on year decline in TAB wagering income and targeted investments in significant animal welfare and industry stimulus initiatives.

EXPENDITURE

Expenditure in 2018-19 increased by \$8.6 million in support of initiatives to make the greyhound industry in NSW more responsible, sustainable and competitive. Key items include:-

- As part of the GRNSW Operating Licence, the contribution by GRNSW towards GWIC's first year operating expenses for 2018-19 was \$9,190,000, which included costs related to clearly communicating GWIC's role to industry participants and stakeholders.
- Investment in the GAP rehoming program increased year-on-year with \$1,941,459 spent in 2018-19, up from \$1,622,284 in 2017-18. GRNSW continues to support and invest heavily in all welfare and rehoming activities through further expansion and promotion of the GAP program, improvements and investment in on-course veterinary infrastructure and detailed injury reporting requirements.
- Racing and Club Infrastructure expenditure held steady in 2018-19, as GRNSW continue to provide support to clubs for track surface preparation through standardising equipment and the provision of annual track renovations. As part of the ongoing track safety initiatives, GRNSW also carried out several critical track and infrastructure upgrades at various tracks throughout the year.
- Combined returns to clubs and participants increased to \$37,776,335, an increase of \$2,939,380, driven by an increase in prizemoney announced in March 2019 and the inaugural running of the Million Dollar Chase series in October 2018.
- Marketing and Media expenditure over the financial year increased by \$1,582,028, driven by the Million Dollar Chase promotional campaign and event costs, the GAP awareness campaign and event costs related to the National Adoption Day in April 2019 and the GAP Adoption Day in June 2019.
- Finance, Legal and Corporate costs increased by \$1,506,778 in 2018-19 due staff redundancies, consultant costs related to legal and advisory matters and financial advisory requirements, and costs related to the relocation of the GRNSW Head Office.

INCOME

The headline items related to income include:-

- TAB wagering income decreased by \$1,321,044, equating to a 3.7% decline over the previous year.
- Race Fields Information Use (RFIU) fee income increased by \$636,371, representing a year-on-year growth of 2.6%, offsetting some of the TAB decreases.
- GRNSW received \$5,622,095 in Tax Parity Receipts in 2018-19, which was slightly up from the prior year but lower than expectation due to the weaker TAB wagering result.
- As of 1 January 2019, GRNSW received \$2,317,329 in relation to the newly established Point of Consumption Tax (PoCT). GRNSW receives Tax Parity and PoCT payments on a quarterly basis which has assisted with managing cash flow.



WELFARE AND EDUCATION

WELFARE

As a consequence of the Greyhound Welfare and Integrity Commission (GWIC) commencing operation on 1 July 2018, the oversight of the Welfare function of the NSW greyhound industry is now a shared responsibility between GRNSW and GWIC. GWIC assumed responsibility for the development of the Code of Practice for the Welfare of Greyhounds, veterinary presence at greyhound racetracks and for the compliance of industry participants with respect to welfare of greyhounds in their care. GRNSW retained responsibility for the rehoming of greyhounds and, training and education of participants and clubs to enhance welfare outcomes for greyhounds.

GREYHOUNDS AS PETS PROGRAM

Greyhounds As Pets (GAP) NSW assisted in rehoming 729 Greyhounds in 2018-19 through our adoption centres, new Regional GAP program and reinvigorated schemes providing financial assistance to greyhound owners, and other rehoming organisations to transition greyhounds from the racing industry into life as a pet.

Along with increasing public awareness of why greyhounds make great pets and promotion through marketing campaigns, our adoption days and attendance at events meant we were able to achieve a significant increase on adoptions from the previous year.

GAP held eight adoption days across NSW, with National Adoption Day (NAD) in April being the most successful with 38 greyhounds adopted on the day. NAD saw all the states come together to promote Greyhounds as Pets with TV personality Todd McKenney as the official national ambassador of the initiative.

Outside adoption days, GAP took part in many local community events where dogs were a focus, including the Sydney Royal Easter Show and the Great Global Greyhound Walk - continuing to raise awareness of the greyhound as a breed and what a great pet they make after their racing career. GRNSW would like to thank all our volunteers whose great work assists the program to achieve its goals, particularly with their attendance and support at these events.

The end of the financial year saw Australian sporting star, Tim Cahill, join as the ambassador for the Greyhounds As Pets NSW program. His passion for greyhounds and animal welfare more widely, will be a great asset for reaching far into the community and educating people on this breed.

With GRNSW's continued focus on animal welfare and rehoming, a leadership role was created and appointed within Greyhounds As Pets NSW to drive strategy and growth in the program. Dr Alicia Fuller joined in May 2019 as General Manager for

GAP and will enable GRNSW to strive towards our goal of every greyhound finding a suitable home after racing, enhancing our status as a responsible industry.

OTHER REHOMING INITIATIVES

The total number of NSW greyhounds rehomed continues to improve year-on-year. Along with the GAP program run by GRNSW, there are several independent greyhound rehoming organisations in NSW and these groups, along with owners and trainers, play an active role in the rehoming of greyhounds.

GRNSW continues to provide financial support to independent greyhound rehoming organisations for greyhounds rehomed throughout the year. Following an operational review of existing support schemes, administrative changes were made to improve rehoming outcomes and the welfare of greyhounds being prepared for rehoming. The conditions on the existing Owner Incentive Scheme, which was established to assist owners to rehome greyhounds themselves, were revised to provide better access to the scheme for all owners and trainers.

In line with our strategic pillar to be a responsible industry, GRNSW will continue to offer this support for individuals and organisations in 2019-20 and beyond as part of its long-term commitment to rehoming and in recognition of the important role of independent providers in extending the network of rehoming services.

BREEDING

GRNSW continued to encourage responsible breeding practices throughout 2018-19. The future of greyhound racing is dependent on the industry providing a socially acceptable racing product and optimal breeding is required to provide enough greyhounds to fill the race calendar while minimising the number of pups whelped.

In July 2018, GWIC assumed responsibility for the controls related to breeding. Restrictions on the number of litters which a breeding female can have remained in place, as well as the rules on the age and frequency at which they can breed. These measures are designed to encourage breeders to make informed and responsible breeding decisions in order to increase the proportion of greyhounds that are suitable for racing.

The long-term goal is to improve utilisation rates for pups whelped to support a sustainable industry. This is recognised in NSW and nationally as requiring extensive research to identify additional breeding controls and industry best practice for management of greyhounds, from whelping to racing and throughout their racing career.

GRNSW will continue to work with GWIC and the greyhound industry to enhance breeding outcomes from a welfare perspective, which accords with our pillars to operate as a responsible and sustainable industry. Details of litters whelped and the number of pups in each litter are published on the GWIC website.

RACING SAFETY AT NSW GREYHOUND RACING TRACKS

During August and September 2018, GRNSW rolled out 21 new response vehicles to assist track staff to manage on-track injuries. The response vehicles are electric and provide for an injured greyhound to be rapidly transported to the veterinary rooms for treatment. This initiative is not only a positive outcome for greyhound welfare, it also has workplace health and safety benefits for track attendants who would otherwise have to carry a greyhound a considerable distance to the veterinary rooms.

GRNSW continues to provide portable first aid kits for use by track staff to assist with prompt and appropriate management of injuries during racing or trials.

The Race Injury Rebate Scheme introduced by GRNSW in 2018-19 has been well received by participants. The scheme provides funding for the veterinary treatment of serious injuries that occur during racing. The high cost of treatment for serious injuries may have been prohibitive for many participants in the past, which may have contributed to euthanasia rates. Greyhounds treated under the new scheme can now be rehomed as pets, retired as a breeder or in some cases return to racing.

In 2018-19, GRNSW has worked closely with GWIC to identify and implement new initiatives to reduce the risk of greyhounds being injured on or off tracks. GRNSW provides input on veterinary matters and the status of track maintenance to the Race Injury Review Panel established by GWIC, to assist in identifying underlying causative factors, and preventing or reducing injuries going forward.

EDUCATION

In 2018-19, GRNSW provided a diverse and relevant education and training program for industry participants in accordance with regulatory requirements, with a strong focus on greyhound welfare. In 2016, a first aid course for participants was introduced. Interest in this course has been consistently strong and 466 industry participants had successfully completed the course as of 30 June 2019.

Another program named Pet Prep, which focuses on the preparation of greyhounds for rehoming from the time they are pups, was successfully introduced in 2018. To date, 331 people have attended Pet Prep seminars across NSW.

To provide direction for education activities under the new regulatory structure, the Greyhound Industry Participant Education Steering Committee was established to determine the short, medium and long-term education requirements for participants. The intent is to determine the formal and informal education needs of participants and for GWIC to provide advice on courses and other education materials that will be required for accreditation of participants for registration into the future. To ensure the education activities meet the industry expectations, the Committee includes membership from GRNSW, GWIC, GBOTA and the NSW Agrifood Industry Training Advisory Board.

GRNSW has sought to pursue a nationally recognised training program for participants. This requires the provider to be a Registered Training Organisation (RTO) to have the course accredited under the National Training System.

GRNSW has been working with JobLink Plus, an RTO in NSW, to deliver the core competencies under the Certificate II in Racing (Greyhound). JobLink Plus developed the course which received National accreditation in June 2019. A pilot program for 20 to 30 participants to be trained at three regional locations is scheduled to run in the first half of 2019-20. This will be GRNSW's second form of formal, nationally recognised training, following on from the success of the Greyhound First Aid Course.



OPERATIONS

Throughout 2018-19, the GRNSW Operations team conducted several industry forums to engage with a wide range of industry stakeholders on a variety of topics, including (but not limited to) grading policy, race programming, prizemoney and breeding.

Feedback gathered from the forums prompted a full review of the GRNSW racing team's approach and the following initiatives were introduced as a starting point to enhance the sustainability of our industry:

- A review of the current Grading Policy was undertaken, resulting in a new Grading Policy to be introduced in the second half of 2019.
- GRNSW assumed complete oversight of race programming for all race meetings and consulted regularly with clubs to provide opportunities for all racing greyhounds.
- Prizemoney was increased at 'C' class TAB race meetings which provided regional racing participants with greater potential income opportunities.
- Racing opportunities for greyhounds bred in NSW were introduced at Wentworth Park across all levels of racing.
- GRNSW, in conjunction with Gold Muzzle Auctions, conducted a puppy auction at Richmond which provided support to industry breeders.
- Canberra Greyhound Racing Club conducted their race meetings at the Goulburn venue.
- The number of registered greyhound racing clubs remained at 33.

NSW STATISTICS

Race meetings

	2019	2018	2017	2016	2015
Number of Race Meetings Conducted					
Metropolitan	90	104	100	105	103
TAB	795	767	745	758	810
Non-TAB	219	250	251	345	340
Number of Races Conducted					
Metropolitan	893	1,038	997	1,105	1,029
TAB	8,102	7,995	8,095	7,806	8,090
Non-TAB	1,918	2,374	2,504	3,408	3,303
Number of Starters					
Metropolitan	6,521	7,989	7,688	8,392	7,809
TAB	61,501	60,965	62,533	59,670	61,669
Non-TAB	13,260	17,200	18,893	25,482	24,744

Abandoned race meetings

Reason for Abandonment	TAB	Non-TAB
Industry Suspension	0	0
NON-TAB Racing Review	0	0
Wet Weather	7	1
Heat Policy	7	5
Track or Racing Infrastructure Issue	3	5
Other	1	0
Total	18	11

- Note that there were an additional eight (8) race meetings abandoned due to lack of nominations.
- Racing at Wentworth Park was reduced due to track renovations taking place. These race meetings were held at provincial venues with City prizemoney attached.

SERVICEABILITY RATE

Pursuant to its Operating Licence, GRNSW is required to propose, in consultation with the Commission, an annual serviceability rate target and report on its performance against that target each year as part of its annual report. The 'serviceability rate' is the proportion of race meetings cancelled due to safety concerns. GRNSW, in consultation with GWIC, set the 2018-19 serviceability rate target based on the 2017-18 performance – which equated to 2.8%.

Based on the data above, the serviceability rate for 2018-19 was 29 abandoned race meetings from a total of 1,104 race meetings in NSW – equating to 2.6%. This assumes that 'safety concerns' includes Wet Weather, Heat Policy, Track or Racing Infrastructure issue and Other categories in the table above.

TRACK MAINTENANCE

Continual improvements in safety and welfare outcomes for greyhounds was the key focus of GRNSW's track maintenance operations in 2018-19. A new Track Safety Standards and Procedures manual was developed, to detail the minimum standard tracks in NSW will be required to attain into the future.

Tracks throughout NSW are now monitored and managed by professional regional co-ordinators who work with the club track managers and staff in the north, south, central west and metropolitan regions to ensure track surfaces are monitored more frequently and the tracks, equipment and racing infrastructure are maintained at an optimum level.

All NSW track surfaces and equipment are audited regularly and renovated once or twice annually with deep harrowing carried out and surface material refreshed, blended or renewed. GRNSW Track Co-ordinators manage the scientific testing and identification of compatible sands for each track, blending and rejuvenation of the track profile, utilising professional up-to-date methods and machinery. The staff provide recommendations for each club to undertake in order to maintain and prepare a safe racing surface for each race meeting and trial session.

Education and training were carried out by the tracks and infrastructure team throughout the year with a strong focus on the importance of track monitoring and the need for track curators to make educated maintenance and preparation decisions.

An improved track inspection process has been further developed and implemented during the year with GRNSW continuing to place the emphasis on the need for clubs to monitor their track surfaces more frequently, using technology and the correct implements and tools to achieve the best results.

In accordance with our pillar of acting as a responsible industry, GRNSW is committed to prioritising its track maintenance work in 2019-20 to keep making all tracks safer and reduce track-related injuries.

INFRASTRUCTURE PROJECTS

During 2018-19, with the assistance of the University of Technology, Sydney (UTS), the Greyhound Racing Welfare and Integrity Commission (GWIC), the NSW Greyhound Breeders Owners & Trainers Association (GBOTA), industry committees and registered race clubs, GRNSW developed the Minimum Safety Standards for the Design and Construction of Racetracks and for Facilities and Amenities. These standards will set the benchmark for future major works, track rebuilds and new track constructions, including tracks and facilities at potential new venues. Plans were also drawn for new straight tracks to be built in accordance with the minimum standards with the very latest safety and technology in place.

Major track rebuild projects were undertaken at Gosford and Gunnedah during the year with major works also carried out at Wentworth Park and Tamworth. Throughout 2018-19 GRNSW funded numerous track maintenance, capital and safety projects across the state and we remain committed to investing in our racetracks and supporting facilities to provide a greater return to the industry and community.

Capital Works, other major projects, track maintenance and renovations and club maintenance funding totalled approximately \$4.7 million, including \$2.26 million in capital works and \$2.4 million in GRNSW funded works for track and venue improvements across the state including Safety Racing Welfare and Maintenance Fund (SRWMF) projects at each of the 32 clubs.

2018-19 GRNSW Safety, Racing and Welfare 'Capital Works' included:

- \$762,570 – Gosford Track Rebuild
- \$678,349 – Gunnedah Track Rebuild
- \$552,894 – Wentworth Park Track reconstruction and infrastructure upgrade
- \$173,720 – Tamworth Track reconstruction and infrastructure upgrade
- \$12,785 – Kempsey Kennel Air Conditioning upgrade
- \$31,820 – Hastings River (Wauchope) Kennel Air Conditioning upgrade
- \$50,000 – Taree Kennel Air Conditioning upgrade



MEDIA, COMMERCIAL AND MARKETING

STAKEHOLDER ENGAGEMENT

GRNSW is required to develop a stakeholder engagement plan each financial year. In accordance with this requirement, GRNSW prepared a Stakeholder Engagement Plan 2018-19, which outlines GRNSW's commitment to effective stakeholder engagement with a range of stakeholders including participants, greyhound racing clubs, key stakeholder groups such as Wagering Service Providers and animal

welfare regulators and veterinary industry groups, the NSW Government and media outlets. The plan outlines a number of engagement activities including Stakeholder Forums, Education Workshops, engagement at NSW race meetings, and Stakeholder Magazine.

Pursuant to its Operating Licence, GRNSW's performance against the plan and the outcome of engagement activities is set out in the table below:

Stakeholder engagement activities	Completed in 2018-19	Outcome of engagement
Stakeholder forums	Yes	Stakeholder forums provided GRNSW with an opportunity to work collaboratively with stakeholders, to seek their ideas, feedback and input into GRNSW's policies and new strategic objectives.
Bi-monthly one-on-one meetings	No. This engagement was achieved through the Business unit forums.	
Business unit forums (including welfare, regulatory, operations, racing, grading and governance)	Yes. These forums will be renamed to Business unit meetings and based on stakeholder feedback, will be held on a quarterly basis.	Business unit forums were crucial to further strengthening relationships with key stakeholders during 2018-19 and provided an opportunity for stakeholders to provide input into the reviews of existing policies and processes and to inform development of and new policies and processes.
Key project sub-committees	Yes	GRNSW established and participated in a number of sub-committees, which met regularly throughout 2018-19, including committees related to track safety, WH&S, OzChase, various inter-jurisdictional committees pertaining to welfare, rehoming, regulation and communications, and industry reference and advisory committees related to education. These project sub-committees enabled all relevant stakeholders to be involved in the development, progress and implementation of key projects and to evaluate their effectiveness.
Education workshops	Yes	GRNSW continued to roll out education workshops focused on the reforms and key areas such as injury prevention, first aid, injury rehabilitation, greyhound nutrition and care of breeding greyhounds. The education workshops will continue to provide an opportunity to inform participants about the importance of socialisation, rehoming responsibilities, greyhound welfare and best practice husbandry. Education workshops are a key enabler of positive cultural change within the greyhound industry.
Awards night	No. However other marquee events have been developed (e.g. Million Dollar Chase).	
Stakeholder engagement at NSW race meetings	Yes	GRNSW continued to engage with stakeholders at race meetings across NSW to gain an understanding of what motivates participants, clubs, spectators and wagering operators to maximise participation, competitiveness and wagering outcomes and ensure the future sustainability of the sport.
Stakeholder magazine	Yes	The Chaser is released on a bi-monthly basis and provides an overview of the highlights and successes in the industry and educational pieces to keep the industry informed and engaged.
Stakeholder Survey	Yes	The Stakeholder Survey and the Economic Study enabled GRNSW to gain an understanding of the demographic interested in greyhound racing, perceptions of the greyhound racing industry and how it can be improved. This information was used to inform the development of new strategic priorities and objectives.

Stakeholder engagement activities	Completed in 2018-19	Outcome of engagement
Media releases	Yes	GRNSW made regular media announcements regarding significant regulatory decisions, new policies and changes in the industry. These media releases kept the industry informed of important information and demonstrated GRNSW's ongoing commitment to transparency.
Annual report	Yes	The Annual Report outlines GRNSW's work and activities in accordance with the Greyhound Racing Act 2017 and the Operating Licence.
CEO updates	Yes	Regular CEO updates were distributed to keep the industry informed of changes in the industry due to the reforms, significant decisions and improve culture and morale following the prohibition.
Track curator conference	Yes	GRNSW held the annual track curator conference for TAB and non-TAB tracks. The conference provided curators and other relevant stakeholders with an update on the status of research in relation to track design, information regarding improved track maintenance processes and new technology to assist with reporting and compliance.
Responses to formal inquiries and website inquiries	Yes	GRNSW continued to respond to formal and website inquiries in a professional and courteous manner, providing relevant and objective information in response to queries and concerns, demonstrating GRNSW's ongoing commitment to transparency and customer service.

GRNSW has refreshed its engagement plan for the 2019-20 Financial Year and this focuses on actively engaging with: Corporates (Wagering Service Providers, Bookmakers, Broadcasters and Media Organisations), Participants and Clubs (Committee members and club volunteers, participants, and industry representative associations), the Broader Community (Wagerers and fans of greyhound racing, the NSW community, and animal welfare organisations) and Regulators (GWIC and Government and Members of Parliament).

GRNSW will continue to enhance its relationships with stakeholders and effectively consult on all newly developed policies and initiatives.

MARKETING

GRNSW's marketing objectives for 2018-19 were to enhance the profile of greyhound racing in NSW, reinforce the three pillars outlined in our Strategic Plan – Responsible, Sustainable and Competitive, and promote and raise awareness of the Greyhounds As Pets program. To achieve these objectives, significant investments in marketing capability were required, including:

1. Engaging professional marketing services to enhance quality of advertising and impact of media
2. Recruiting a high-profile ambassador for Greyhounds As Pets to achieve increased awareness and education of the program
3. Recruiting marketing experts to deliver market leading campaigns

Building on the marketing campaigns delivered in 2018-19 for Million Dollar Chase, Friday Night Lightning and Greyhounds As Pets adoption days, Advertising agency *Banjo* and media agency *Thump Media* have been appointed to deliver major marketing campaigns in 2019-20.

Tim Cahill was announced as Greyhounds As Pets ambassador for the next three years, an announcement in June 2019 coinciding with a Greyhounds As Pets adoption day in Rose Bay, which achieved widespread media coverage across

mainstream TV, radio and press. Tim will feature prominently in all Greyhounds As Pets marketing campaigns in 2019-20.

In 2018-19, GRNSW recruited several leadership roles in marketing and media to enhance capabilities in these areas and will continue to expand internal capabilities in 2019-20. This is consistent with our pillar of operating as a sustainable industry.

MEDIA PARTNERSHIPS

To further enhance GRNSW's profile beyond traditional media advertising, GRNSW maintained partnerships with News Corp Australia and Fairfax Media to deliver greyhound racing form guides and related editorial content to the NSW public. In 2018-19, a new partnership was established with Crocmedia to connect with audiences in regional NSW via Crocmedia's extensive radio network. GRNSW are focused on establishing strong media partnerships across all platforms to enhance the profile of the industry.

DIGITAL

In 2018-19 an extensive review of all GRNSW's digital assets was completed. The outcome of this review will be the relaunch of all GRNSW digital platforms in 2019-20, which is expected to significantly boost GRNSW's existing digital audience of over 60,000 users each month and ensure thedogs.com.au continues to be one of Australia's leading greyhound racing websites.

WAGERING

Greyhound racing in NSW faced wagering challenges on a few key fronts in 2018-19, however turnover grew by \$4.1 million to \$1.496 billion. Given the strong 13.5% overall rise in 2017-18, the growth rate in 2018-19 declined when taking into consideration the delayed flow-on impacts of the racing ban and the introduction of the Point of Consumption Tax (PoCT).

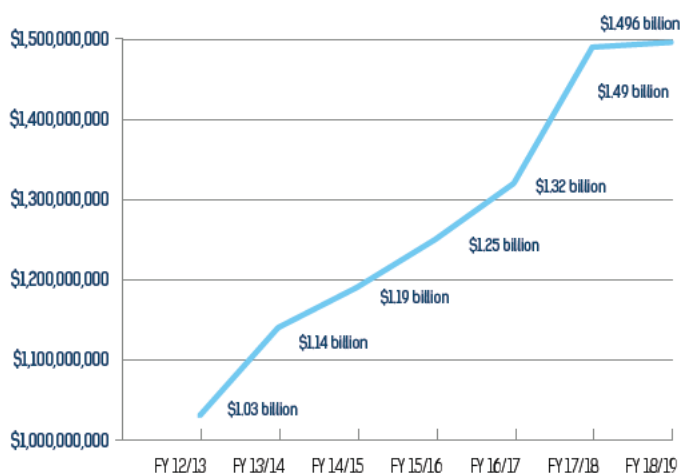
The introduction of PoCT negatively impacted the wagering outcome. The "overrounds" (bookmakers' margin embedded in the odds offered) have consequently increased, resulting in the tax being passed on to customers. This has stifled turnover as the odds offered are 'less attractive'.

Another issue related to the PoCT is its distribution across the racing codes. Whilst \$40 million in PoCT revenue was earmarked for distribution to racing, the percentage assigned to NSW Greyhounds is well below its actual market share of racing. A review of the PoCT will be conducted midway through 2020 and GRNSW will again lobby for a more equitable outcome in line with demonstrated market share.

The third major impact on wagering revenue was the relative underperformance of the TAB in 2018-19, which is GRNSW's major source of industry funding. Racing has traditionally relied on the state-based totalisators for sustainability, but they have been impacted in recent times by an eroding market share and weakening in retail wagering.

Despite these challenges, NSW greyhound racing is proving remarkably robust and these full year numbers should be viewed in a positive light.

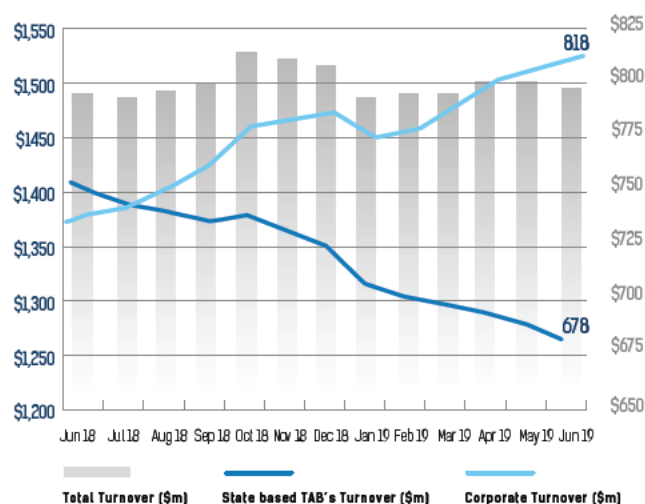
Total Turnover Growth: 12/13 through 18/19



Corporate Bookmakers: Leading the way at growing GRNSW product

Combined Corporate Turnover rose \$77.6 million or 10.5% Year-on-Year. This was on top of a \$171 million gain in 2017-18 (up 30.3%) and a \$92 million gain from the prior year. This trend demonstrates the outlook of the domestic wagering landscape into the future, with the growth of corporate bookmaking expected to continue.

In July 2018, the combined state-based TAB's Total Turnover *equalled* the combined Corporates Turnover for the first time. Historically, the state-based TAB's dominated market share, but the trend has now reversed, as shown in the chart below.



12 Month Data	FY Data 17/18	FY Data 18/19	Movement	Y-o-Y Change
Combined State based TAB turnover	\$751.6m	\$678.2m	-\$73.4m	↓ 9.8%
Combined Corporate Turnover (Incl. Betfair)	\$740.2m	\$817.8m	+\$77.6m	↑ 10.5%

Corporate bookmakers continue to capitalise on their ability to penetrate the key 18-34 demographic. They have proven to be adept at expanding greyhounds' popularity via their digital integration channels. Data received from the Corporates suggest it is 15 times easier to convert a sports' punter into a greyhound follower rather than a thoroughbred wagerer.

GRNSW has positioned itself favourably with the Corporates by implementing a Product Fee structure that has been widely accepted throughout the industry. This in turn creates overall growth as Corporates are incentivised to grow our racing product for a mutually beneficial outcome.

Aggregated margins sat at 13.76% in 2018-19, down from 14.38% in 2017-18, which was largely related to smaller average race fields. Going forward, GRNSW is well-positioned to capitalise on the consistently high yields generated by greyhound racing, along with the competitive nature of the RFIU Product Fees.

The TAB

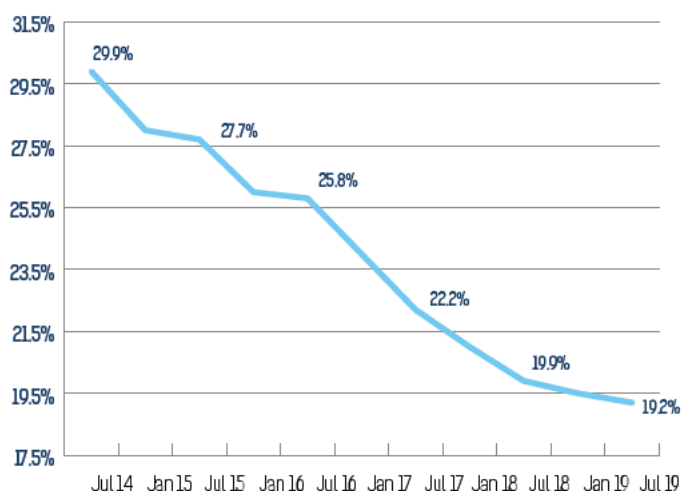
During 2018-19, the NSW TAB's turnover on greyhound racing dropped by 8.7%, following a decline of 0.5% in the previous year. Its Market Share of Turnover has declined from 22.2% in 2016-17 to 19.2% in 2018-19.

While the decline of the pari-mutuel product turnover was anticipated by GRNSW, the extent of the decline, particularly in Fixed Odds Turnover in 2018-19, was greater than expected.

TABCORP acquired the Ubet portfolio of brands covering four state-based monopolies. The Ubet group turnover *declined* 10.5% on the NSW Greyhounds product in 2018-19. Along with declines in the Victorian TAB, which was down 9.2%, there was a \$2.5-\$3.5 million reduction in Product Fee contributions to the NSW greyhound industry for the entire TABCORP group last year. The NSW TAB distributions to GRNSW declined by \$1.3 million in 2018-19 compared to the prior year.

GRNSW have been proactively engaging with the TAB to overcome this trend. Several initiatives are currently under consideration as both GRNSW and the NSW TAB seek to maximise future partnership opportunities.

NSW TAB Total Turnover Market Share: July-14 to July-19



LEGAL AND POLICY

LEGISLATION

GRNSW took part in various conferences and planning meetings with stakeholders in relation to proposed amendment of the *Greyhound Racing Regulation 2019*. These included a series of meetings with the Parliamentary Counsel's Office, the Office of Racing and the Greyhound Welfare and Integrity Commission (GWIC) legal team.

The Regulation implements the next phase of the NSW Government's greyhound racing reforms and introduces key changes to support improved regulation of the industry.

The new regulations that consequently came into effect on 1 September 2019 include:

1. An enhanced registration framework will be introduced. Participants who are currently registered will remain under their existing registration conditions until they renew their registration;
2. The definition of a greyhound racing industry participant will expand to include additional parties involved in the greyhound racing industry.
3. New annual reporting requirements will apply to GWIC and Greyhound Racing NSW;
4. New penalty infringement notices and amounts apply for offences under the Act and the Regulation; and
5. GWIC will be able to share information in its registers with specified agencies.

Successful implementation of these measures will reinforce GRNSW's three operating pillars – Responsible, Sustainable and Competitive.

EXPORTS INQUIRY

The inquiry into the unauthorised export of greyhounds to countries that do not comply with Australian animal welfare standards (Exports Inquiry) remains ongoing. Throughout the reporting period the Exports Inquiry has been stewarded by Adrian Anderson.

In 2018-19, the Exports Inquiry issued charges against greyhound racing industry participants as part of the ongoing inquiry concerning the unauthorised exports of greyhounds to China and Macau. The following decisions were handed down:

- On 1 August 2019, the Steward handed down a decision disqualifying a greyhound racing industry participant, together with a fine of \$17,000, in respect of the export of 36 greyhounds to China.
- On 1 August 2019, the Steward imposed a "warning off" on a participant pending compliance with directions to cooperate with the provision of information. The Steward also fined the participant for associated offences concerning the unauthorised export of greyhounds to China and Macau under the Greyhound Racing Rules.

Several individuals were also charged for their failure to lodge documentation pursuant to Rule 117 of the *Greyhound Racing Rules*.

ACCESS TO INFORMATION AND STATUTORY NOTICES

During 2018-19 GRNSW provided information in response to several access to information requests under *Government Information (Public Access) Act 2009*. Please see the table at Appendix A for a breakdown of the types of information requests received by GRNSW during 2018-2019.



GIPA REPORT

Greyhound Racing NSW is subject to the provisions of the *Government Information (Public Access) Act 2009*. During 2018-19 GRNSW received 10 formal requests for information under this Act:

Table A: Number of applications by type of applicant and outcome

	Access granted in full	Access granted in part	Access refused in full	Information not held	Information already available	Refuse to deal with application	Refuse to confirm/ deny whether information is held	Application withdrawn
Media	-	-	-	-	-	-	-	-
Members of Parliament	2	1	-	-	-	-	-	-
Private sector business	-	-	-	-	-	-	-	-
Not for profit organisations or community groups	-	-	-	-	-	-	-	-
Members of the public (application by legal representative)	-	-	-	-	-	-	-	-
Members of the public (other)	2	2	1	2	-	-	-	-

* More than one decision can be made in respect of a particular access application. If so, a recording is made in relation to each such decision. This also applies to Table B.

Table B: Number of applications by type of application and outcome

	Access granted in full	Access granted in part	Access refused in full	Information not held	Information already available	Refuse to deal with application	Refuse to confirm/ deny whether information is held	Application withdrawn
Personal information applications*	-	-	-	-	-	-	-	-
Access applications (other than personal information applications)	4	3	1	1	-	-	-	-
Access applications that are partly personal information applications and partly other	-	-	-	1	-	-	-	-

* A *personal information application* is an access application for personal information (as defined in clause 4 of Schedule 4 to the Act) about the applicant (the applicant being an individual).

Table C: Invalid applications

Reason for invalidity	No of applications
Application does not comply with formal requirements (section 41 of the Act)	1
Application is for excluded information of the agency (section 43 of the Act)	-
Application contravenes restraint order (section 110 of the Act)	-
Total number of invalid applications received	1
Invalid applications that subsequently became valid applications	1

Table D: Conclusive presumption of overriding public interest against disclosure: matters listed in Schedule 1 of Act.

	Number of times consideration used*
Overriding secrecy laws	-
Cabinet information	-
Executive Council information	-
Contempt	-
Legal professional privilege	1
Excluded information	-
Documents affecting law enforcement and public safety	-
Transport safety	-
Adoption	-
Care and protection of children	-
Ministerial code of conduct	-
Aboriginal and environmental heritage	-

* More than one public interest consideration may apply in relation to a particular access application and, if so, each such consideration is to be recorded (but only once per application). This also applies in relation to Table E.

Table E: Other public interest considerations against disclosure: matters listed in table to section 14 of Act

	Number of occasions when application not successful
Responsible and effective government	-
Law enforcement and security	-
Individual rights, judicial processes and natural justice	3
Business interests of agencies and other persons	1
Environment, culture, economy and general matters	-
Secrecy provisions	-
Exempt documents under Interstate Freedom of Information legislation	-

Table F: Timeliness

	Number of applications
Decided within the statutory timeframe (20 days plus any extensions)	10
Decided after 35 days (by agreement with applicant)	-
Not decided within time (deemed refusal)	-
Total	10

Table G: Number of applications reviewed under Part 5 of the Act (by type of review and outcome)

	Decision varied	Decision upheld	Total
Internal review	-	1	1
Review by Information Commissioner	-	-	-
Internal review following recommendation under section 93 of Act	-	-	-
Review by ADT	-	-	-
Total	-	1	1

Table H: Applications for review under Part 5 of the Act (by type of applicant)

	Number of applications for review
Applications by access applicants	-
Applications by persons to whom information the subject of access application relates (see section 54 of the Act)	-

Table I: Applications transferred to other agencies under Division 2 of Part 4 of the Act (by type of transfer)

	Number of applications transferred
Agency-initiated transfers	-
Applicant-initiated transfers	-

FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2019

GREYHOUND RACING NEW SOUTH WALES

ABN 61 018 166 136

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FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
ABN 61 018 166 136

STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED 30 JUNE 2019

Income		
	2019	2018
	\$	\$
TAB distributions	34,244,576	35,565,620
Race field information use fees	25,148,952	24,512,581
Tax receipts	7,939,424	5,149,482
Other income	1,095,663	1,026,444
Marketing & Digital	421,706	445,574
Interest	198,764	191,508
Greyhounds as Pets	57,215	149,838
Sponsorship	300,000	-
Total income	69,406,300	67,041,047

Expenditure		
	2019	2018
	\$	\$
Prizemoney & Race Club costs	(37,776,335)	(34,836,955)
Finance, legal & corporate	(9,481,606)	(7,974,828)
Regulatory	(9,198,235)	(7,676,074)
Media & Digital	(3,410,701)	(1,828,673)
Racing & Club infrastructure	(3,067,651)	(3,016,932)
Operations	(2,876,071)	(1,773,842)
IT costs	(1,187,635)	(1,484,063)
Greyhounds as Pets	(1,941,459)	(1,622,284)
Animal welfare	(833,048)	(832,279)
Depreciation	(541,459)	(473,132)
Loss on sale of fixed assets	(80,787)	(10,980)
Other expenses	(519,550)	(748,522)
Total expenditure	(70,914,537)	(62,278,564)
(Loss) / surplus for the year	(1,508,237)	4,762,483
Other comprehensive income	-	-
Total comprehensive (loss) / income for the year	(1,508,237)	4,762,483

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
ABN 61 018 166 136

Statement of Financial Position 30 June 2019

		2019	2018
	Note	\$	\$
ASSETS			
CURRENT ASSETS			
Cash and cash equivalents	5	5,680,843	10,125,774
Trade and other receivables	6	17,748,274	16,370,671
Financial assets	8	302,354	377,674
Other current assets	9	201,583	25,825
TOTAL CURRENT ASSETS		23,933,054	26,899,944
NON-CURRENT ASSETS			
Trade and other receivables	6	-	9,542
Property, plant and equipment	7	3,789,790	3,868,919
Financial assets	8	6,497,681	6,497,681
Intangible assets	10	-	-
TOTAL NON-CURRENT ASSETS		10,287,471	10,376,142
TOTAL ASSETS		34,220,525	37,276,086
LIABILITIES			
CURRENT LIABILITIES			
Trade and other payables	11	5,462,028	6,402,520
Provisions	15	631,218	909,892
Borrowings	12	-	253,591
TOTAL CURRENT LIABILITIES		6,093,246	7,566,003
NON-CURRENT LIABILITIES			
Provisions	15	52,987	115,864
Borrowings	12	-	11,690
TOTAL NON-CURRENT LIABILITIES		52,987	127,554
TOTAL LIABILITIES		6,146,233	7,693,557
NET ASSETS		28,074,292	29,582,529
EQUITY			
Reserves	13	676,386	676,386
Retained surplus		27,397,906	28,906,143
TOTAL EQUITY		28,074,292	29,582,529

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
ABN 61 018 166 136

Statement of Changes in Equity For the Year Ended 30 June 2019

	Reserves	Retained Surplus	Total
	\$	\$	\$
Balance at 1 July 2018	676,386	28,906,143	29,582,529
Surplus for the year	-	(1,508,237)	(1,508,237)
Other comprehensive income	-	-	-
Total other comprehensive income for the year	-	(1,508,237)	(1,508,237)
Balance at 30 June 2019	676,386	27,397,906	28,074,292
Balance at 1 July 2017	676,386	24,143,660	24,820,046
Surplus for the year	-	4,762,483	4,762,483
Other comprehensive income	-	-	-
Total other comprehensive income for the year	-	4,762,483	4,762,483
Balance at 30 June 2018	676,386	28,906,143	29,582,529

Statement of Cash Flows For the Year Ended 30 June 2019

		2019	2018
	Note	\$	\$
CASH FLOWS FROM OPERATING ACTIVITIES:			
Receipts from operations		67,739,037	66,492,586
Payments to suppliers and employees		(71,675,421)	(60,453,248)
Interest received		198,764	191,508
Net cash provided by operating activities		(3,737,620)	6,230,846
CASH FLOWS FROM INVESTING ACTIVITIES:			
Proceeds from sale of property, plant and equipment		384,168	19,091
Payment for property, plant and equipment		(826,198)	(757,836)
Net cash used by investing activities		(442,030)	(738,745)
CASH FLOWS FROM FINANCING ACTIVITIES:			
Payments of lease liability /finance lease		(265,281)	(131,338)
Net cash used by financing activities		(265,281)	(131,338)
Net increase in cash and cash equivalents held		(4,444,931)	5,360,763
Cash and cash equivalents at beginning of year		10,125,774	4,765,011
Cash and cash equivalents at end of financial year	5	5,680,843	10,125,774

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 30 JUNE 2019

Greyhound Racing New South Wales (GRNSW) is a reporting entity.

GRNSW is an independent body corporate established under the Greyhound Racing Act 2017 to represent, fund and control the commercial operations of the greyhound racing industry in New South Wales. It commenced operations on 10 February 2003.

The financial report was authorised by those charged with governance of Greyhound Racing New South Wales on 29 October 2019.

1 BASIS OF PREPARATION

The financial statements are general purpose financial statements that have been prepared in accordance with Australian Accounting Standards – Reduced Disclosure Requirements of the Australian Accounting Standards Board. GRNSW is a for-profit entity for financial reporting purposes under Australian Accounting Standards.

Australian Accounting Standards set out accounting policies that the Australian Accounting Standards Board has concluded would result in financial statements containing relevant and reliable information about transactions, events and conditions. Material accounting policies adopted in the preparation of the financial statements are presented below and have been consistently applied unless stated otherwise.

The financial statements, except for the cash flow information, have been prepared on an accruals basis and are based on historical costs, modified, where applicable, by the measurement at fair value of selected non-current assets, financial assets and financial liabilities. The amounts presented in the financial statements have been rounded to the nearest dollar, and are presented in Australian dollars.

2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

(a) Property, plant and equipment

Each class of property, plant and equipment is carried at cost or fair value less, where applicable, any accumulated depreciation and impairment.

Property

Freehold land and buildings are carried at cost, less accumulated depreciation for buildings.

Plant and equipment

Plant and equipment are carried at cost less accumulated depreciation and impairment losses.

The carrying amount of plant and equipment is reviewed annually by the entity to ensure it is not in excess of the recoverable amount from those assets. The recoverable amount is assessed on the basis of the accepted net cash flows which will be received from the assets employment and subsequent disposal. The expected net cash flows have not been discounted to present values in determining recoverable amounts.

Depreciation

Property, plant and equipment including capitalised lease assets are depreciated on a straight line basis over their useful lives to GRNSW, commencing from the time the asset is held ready for use. Fixed asset purchases of items below \$5,000 are written off to expense in the year of acquisition.

The depreciation rates used for each class of depreciable asset are shown below:

Fixed asset class	Depreciation rate %
Office equipment	40
Computer equipment	40
Furniture fittings	15
Motor vehicles	22.5
Leasehold improvements	12.5
Buildings	5

The asset's residual values and useful lives are reviewed and adjusted if appropriate at each balance date.

An asset's carrying amount is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount.

Gains and losses on disposal are determined by comparing proceeds with the carrying amount. These gains or losses are included in the statement of comprehensive income. When revalued assets are sold, amounts included in the revaluation reserve relating to that asset are transferred to retained surplus.

(b) Leases

Lease payments for operating leases, where substantially all the risks and benefits remain with the lessor, are charged as an expense in the periods in which they are incurred.

Lease incentives under operating leases are recognised as a liability and amortised on a straight-line basis over the life of the lease term.

(c) Insurance

Insurance policies are held to cover all material risks. The insurance coverage is reviewed annually to ensure adequate cover for all risk areas.

(d) Financial Instruments

(i) Classification

From 1 July 2018, the Company classifies its financial assets in the following measurement categories:

- those to be measured subsequently at fair value (either through OCI or through profit or loss), and
- those to be measured at amortised cost.

The classification depends on the Company's business model for managing the financial assets and the contractual terms of the cash flows.

For assets measured at fair value, gains and losses will either be recorded in profit or loss or OCI. For investments in equity instruments that are not held for trading, this will depend on whether the Company has made an irrevocable election at the time of initial recognition to account for the equity investment at fair value through other comprehensive income (FVOCI).

The Company reclassifies debt investments when and only when its business model for managing those assets changes.

(ii) Recognition and derecognition

Regular way purchases and sales of financial assets are recognised on trade-date, the date on which the Company commits to purchase or sell the asset. Financial assets are derecognised when the rights to receive cash flows from the financial assets have expired or have been transferred and the Company has transferred substantially all the risks and rewards of ownership.

(iii) Measurement

At initial recognition, the Company measures a financial asset at its fair value plus, in the case of a financial asset not at fair value through profit or loss (FVPL), transaction costs that are directly attributable to the acquisition of the financial asset. Transaction costs of financial assets carried at FVPL are expensed in profit or loss.

Financial assets with embedded derivatives are considered in their entirety when determining whether their cash flows are solely payment of principal and interest.

(iv) Impairment

From 1 July 2018, the Company assesses on a forward looking basis the expected credit losses associated with its debt instruments carried at amortised cost and FVOCI. The impairment methodology applied depends on whether there has been a significant increase in credit risk.

For trade receivables, the Company applies the simplified approach permitted by AASB 9, which requires expected lifetime losses to be recognised from initial recognition of the receivables.

(v) Accounting policies applied until 30 June 2018 Initial recognition and measurement

Financial instruments are initially measured at cost on trade date, which includes transaction costs, when related contractual rights or obligations exist. Subsequent to initial recognition, these instruments are measured as set out below.

Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market and are stated at amortised cost using the effective interest rate method.

Financial liabilities

Non-derivative financial liabilities are recognised at amortised cost, comprising original debt less principal payment and amortisation.

Impairment

At each reporting date, the entity assesses where there is objective evidence that a financial instrument has been impaired. Losses are recognised in the statement of comprehensive income.

Derecognition

Financial assets are derecognised when the contractual rights to receipt of cash flows expire or the asset is transferred to another party whereby the entity no longer has any significant continuing involvement in the risks and benefits associated with the asset. Financial liabilities are derecognised when the related obligations are discharged or cancelled, or have expired. The difference between the carrying amount of the financial liability extinguished or transferred to another party and the fair value of consideration paid, including the transfer of non-cash assets or liabilities assumed, is recognised in profit or loss.

(e) Borrowings

Loans and borrowings are initially recognised at the fair value of the consideration received, net of transaction costs. They are subsequently measured at amortised cost using the effective interest method.

(f) Employee benefits

Short-term employee benefits

Liabilities for wages and salaries, including non-monetary benefits, annual leave and long service leave expected to be settled wholly within 12 months of the reporting date are measured at the amounts expected to be paid when the liabilities are settled.

Other long-term employee benefits

The liability for annual leave and long service leave not expected to be settled within 12 months of the reporting date are measured at the present value of expected future payments to be made in respect of services provided by employees up to the reporting date using the projected unit credit method. Consideration is given to expected future wage and salary levels, experience

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
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of employee departures and periods of service. Expected future payments are discounted using market yields at the reporting date on corporate bonds with terms to maturity and currency that match, as closely as possible, the estimated future cash out flows.

(g) Income Tax

No provision for income tax has been raised as the entity is exempt from income tax under Div 50 of the Income Tax Assessment Act 1997.

(h) Superannuation commitments

Superannuation contributions made on behalf of employees are charged as expenses when incurred.

(i) Cash and cash equivalents

Cash and cash equivalents include cash on hand and deposits held at call with banks.

For the statement of cash flows presentation purposes, cash and cash equivalents comprises the above.

(j) Revenue and other income

The Company recognises revenue as follows:

Revenue from contracts with customers

Revenue is recognised at an amount that reflects the consideration to which the Company is expected to be entitled in exchange for transferring goods or services to a customer. For each contract with a customer, the Company: identifies the contract with a customer; identifies the performance obligations in the contract; determines the transaction price which takes into account estimates of variable consideration and the time value of money; allocates the transaction price to the separate performance obligations on the basis of the relative stand-alone selling price of each distinct good or service to be delivered; and recognises revenue when or as each performance obligation is satisfied in a manner that depicts the transfer to the customer of the goods or services promised.

Variable consideration within the transaction price, if any, reflects concessions provided to the customer such as discounts, rebates and refunds, any potential bonuses receivable from the customer and any other contingent events. Such estimates are determined using either the 'expected value' or 'most likely amount' method. The measurement of variable consideration is subject to a constraining principle whereby revenue will only be recognised to the extent that it is highly probable that a significant reversal in the amount of cumulative revenue recognised will not occur. The measurement constraint continues until the uncertainty associated with the variable consideration is subsequently resolved. Amounts received that are subject to the constraining principle are recognised as a refund liability.

Sale of goods

Revenue from the sale of goods is recognised at the point in time when the customer obtains control of the goods, which is generally at the time of delivery. This includes Race field information use fees and Greyhounds as Pets fees.

Rendering of services

Revenue from a contract to provide services including TAB distributions is recognised over time as the services are rendered based on a fixed percentage of funds collected by TABCORP.

Interest

Interest revenue is recognised on a proportional basis taking into account the interest rates applicable to the financial assets.

Government grants

A number of the Company's track upgrade programs and point of consumption Tax receipts are supported by grants received from the state government.

If conditions are attached to a grant which must be satisfied before the Company is eligible to receive the contribution, recognition of the grant as revenue is deferred until those conditions are satisfied.

Where a grant is received on the condition that specified services are delivered to the grantor, this is considered a reciprocal transaction. Revenue is recognised as services are performed and at year end a liability is recognised until the service is delivered.

Revenue from a non-reciprocal grant that is not subject to conditions is recognised when the Company obtains control of the funds, economic benefits are probable and the amount can be measured reliably. Where a grant may be required to be repaid if certain conditions are not satisfied, a liability is recognised at year end to the extent that conditions remain unsatisfied.

Where the Company receives a non-reciprocal contribution of an asset from a government or other party for no or nominal consideration, the asset is recognised at fair value and a corresponding amount of revenue is recognised.

All revenue is stated net of the amount of goods and services tax (GST).

(k) Trade and other receivables

Trade receivables are initially recognised at fair value and subsequently measured at amortised cost using the effective interest method, less any allowance for expected credit losses. Trade receivables are generally due for settlement within 30 days.

The Company has applied the simplified approach to measuring expected credit losses, which uses a lifetime expected loss allowance. To measure the expected credit losses, trade receivables have been grouped based on days overdue.

Other receivables are recognised at amortised cost, less any allowance for expected credit losses.

(l) Accounts payable and other payables

Accounts payable and other payables represent the liabilities outstanding at the end of the reporting period for goods and services received by GRNSW during the reporting period that remain unpaid. The balance is recognised as a current liability with the amounts normally paid within 30 days of recognition of the liability.

(m) Impairment of assets

At the end of each reporting period, the entity assesses whether there is any indication that an asset may be impaired. The assessment will include considering external sources of information and internal sources of information, associates or jointly controlled entities deemed to be out of pre-acquisition profits. If such an indication exists, an impairment test is carried out on the asset by comparing the recoverable amount of the asset, being the higher of the asset's fair value less costs to sell and value in use to the asset's carrying amount. Any excess of the asset's carrying amount over its recoverable amount is recognised immediately in profit or loss, unless the asset is carried at a revalued amount in accordance with another Standard (e.g. in accordance with the revaluation model in AASB 116). Any impairment loss of a revalued asset is treated as a revaluation decrease in accordance with that other Standard.

Where it is not possible to estimate the recoverable amount of an individual asset, the entity estimates the recoverable amount of the cash-generating unit to which the asset belongs.

Impairment testing is performed annually for goodwill and intangible assets with indefinite lives.

(n) Intangibles other than good will

Licence costs are capitalised only when it can be established that the licence will deliver future economic benefits and these benefits can be measured reliably.

Capitalised licence costs are amortised on a systematic basis matched to the future economic benefits over the useful life of the licence.

(o) Changes in accounting policies, disclosures, standards and interpretations

(i) **New and amended standards and interpretations**

The Company applied *AASB 15 Revenue from Contracts with Customers* and *AASB 9 Financial Instruments* for the first time. The nature and effect of the changes as a result of adoption of these new accounting standards are described below.

Several other amendments and interpretations apply for the first time in 2018, but do not have an impact on the financial statements of the Company.

AASB 15 Revenue from Contracts with Customers

AASB 15 supersedes AASB 118 Revenue and related Interpretations and it applies, with limited exceptions, to all revenue arising from contracts with its customers. AASB 15 establishes a five-step model to account for revenue arising from contracts with customers and requires that revenue be recognised at an amount that reflects the consideration to which an entity expects to be entitled in exchange for transferring goods and services to a customer.

AASB 15 required entities to exercise judgement, taking into consideration all the relevant facts and circumstances when applying each step of the models to contracts with their customers. The standard also specifies the accounting for the incremental costs of obtaining a contract and the costs directly related to fulfilling a contract. In addition, the standard required extensive disclosures.

The Company adopted AASB 15 using the modified retrospective method of adoption. There was no significant impact on recognition or measurement in the statement of profit or loss and other comprehensive income, statement of financial position or the statement of cash flows as a result of the adoptions but there has been a change in the required disclosures to reflect the requirements of the new accounting standard.

AASB 9 Financial Instruments

AASB 9 replaces AASB 139 Financial Instruments: Recognition and Measurement for annual periods beginning on or after 1 January 2018, bringing together all three aspects of the accounting for financial instruments: classification and measurement; impairment; and hedge accounting.

The Company adopted AASB 9 using the modified retrospective method of adoption, with the initial application date of 1 July 2018.

(ii) **Accounting standards and interpretations issued but not yet effective**

Certain Australian Accounting Standards and Interpretations have recently been issued or amended but are not yet effective and have not been adopted by the Company for the annual reporting year ended 30 June 2019. The directors have not early adopted any of these new amended standards and interpretations. The directors are in the process of assessing the impact of the applications of *AASB 16 Leases* (effective 1 July 2019) and its amendment to the extent relevant to the financial statement of the Company.

(p) Current and non-current classification

Assets and liabilities are presented in the statement of financial position based on current and non-current classification. An asset is classified as current when: it is either expected to be realised or intended to be sold or consumed in the consolidated entity's normal operating cycle; it is held primarily for the purpose of trading; it is expected to be realised within 12 months after the reporting period; or the asset is cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least 12 months after the reporting period. All other assets are classified as non-current.

A liability is classified as current when: it is either expected to be settled in the consolidated entity's normal operating cycle; it is held primarily for the purpose of trading; it is due to be settled within 12 months after the reporting period; or there is no unconditional right to defer the settlement of the liability for at least 12 months after the reporting period. All other liabilities are classified as non-current.

(q) Comparative figures

Comparative figures in the current year's financial statements have been reclassified on the statement of profit or loss and other comprehensive income to ensure consistency with the presentation for both periods.

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
ABN 61 018 166 136

3 CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS

The Board evaluates estimates and judgements during the preparation of these financial statements regarding assumptions about current and future events affecting transactions and balances.

These estimates and judgements are based on the best information available at the time of preparing the financial statements, however as additional information is known then the actual results may differ from the estimates.

The significant estimates and judgements made have been described below.

Impairment

The entity assesses impairment at the end of each reporting period by evaluating the conditions and events specific to the entity that may be indicative of impairment triggers. Recoverable amounts of relevant assets are reassessed using value-in-use calculations which incorporate various key assumptions.

Loan Receivable

Included within financial assets is a receivable of \$6,497,681 due from Wentworth Park Sporting Complex Land Manager (WPSCLM) (formerly Wentworth Park Trust). In assessing the accounting treatment of the receivable GRNSW has sought the assistance of its legal consultant to gather evidence to support its view that the loan is a debt instrument within the relevant laws and regulation that affect GRNSW and the WPSCLM. Based on the fact that the loan is recorded in various government documents, including the NSW Gazette No. 100 26 June 1998, as being a 'repayable loan', the Board of Directors have exercised their judgement and determined for financial reporting purposes that the loan is contractual in nature, and it has been treated as a financial asset in accordance with AASB 9 at amortised cost. Whilst GRNSW has determined, at this stage, not to call on the loan until cessation of racing at Wentworth Park, it reserves its right to do so. GRNSW have also assessed the expected credit loss (ECL) of the receivable, and based on the credit worthiness of the counterparty they consider the ECL to be nil.

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
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	2019	2018
	\$	\$
4 Surplus for the Year		
The result for the year includes the following specific expenses:		
Rental expense on operating leases	546,218	570,619
5 Cash and Cash Equivalents		
Cash at bank	5,680,643	10,124,424
Cash on hand	200	1,350
	5,680,843	10,125,774
6 Trade and Other Receivables		
CURRENT		
Receivables	17,788,857	16,431,712
Allowance for expected credit losses (2018: Provision for impairment of receivables)	(40,583)	(61,041)
	17,748,274	16,370,671
NON-CURRENT		
Receivables	-	9,542
	-	9,542
Allowance for expected credit losses		
The Company has recognised a loss of \$40,007 (2018: \$60,975) in profit or loss in respect of the expected credit losses for the year ended 30 June 2019.		

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
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	2019	2018
	\$	\$
7 Property, Plant and Equipment		
LAND AND BUILDINGS		
Freehold land At cost	1,320,770	1,320,770
Buildings At cost	1,999,580	1,746,535
Accumulated depreciation	(603,096)	(558,745)
	1,396,484	1,187,790
Total land and buildings	2,717,254	2,508,560
PLANT AND EQUIPMENT		
Furniture and fittings At cost	56,695	40,609
Accumulated depreciation	(41,630)	(40,609)
	15,065	-
Motor vehicles At cost	1,547,334	1,785,694
Accumulated depreciation	(757,741)	(623,271)
	789,593	1,162,423
Office equipment and computers At cost	857,048	824,174
Accumulated depreciation	(727,106)	(694,257)
	129,942	129,917
Website development and software At cost	683,406	683,406
Accumulated depreciation	(646,557)	(625,641)
	36,849	57,765
Make good asset At cost	101,087	10,254
Total plant and equipment	1,072,536	1,360,359
Total property, plant and equipment	3,789,790	3,868,919

Movements in Carrying Amounts

Movement in the carrying amounts for each class of property, plant and equipment between the beginning and the end of the current financial year:

	Freehold Land	Buildings	Office equipment and computers	Furniture and fittings	Motor vehicles	Website development and software	Make good assets	Total
2019	\$	\$	\$	\$	\$	\$	\$	\$
Year ended 30 June 2018								
Carrying amount at 1 July 2018	1,320,770	1,187,790	129,917	-	1,162,423	57,765	10,254	3,868,919
Additions	-	337,545	32,874	16,086	245,690	-	113,465	745,660
Disposals	-	(11,159)	-	-	(249,539)	-	(22,632)	(283,330)
Depreciation expense	-	(117,692)	(32,849)	(1,021)	(368,981)	(20,916)	-	(541,459)
Carrying amount at 30 June 2019	1,320,770	1,396,484	129,942	15,065	789,593	36,849	101,087	3,789,790

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
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	2019	2018
	\$	\$
8 Financial Assets		
CURRENT		
Bank Guarantee	302,354	377,674
NON-CURRENT		
Wentworth Park Sporting Complex Land Manager (WPSCLM) (formerly Wentworth Park Trust)	6,497,681	6,497,681
GRNSW has a receivable from Wentworth Park Sporting Complex Land Manager (WPSCLM) (formerly Wentworth Park Trust) totaling \$6,497,681 (2018: \$6,497,681) which is interest free. The receivable arose as a result of the privatisation of the Totalizator Agency Board.		
9 Other Current Assets		
Prepayments	201,583	25,825
10 Intangible Assets		
Licence Cost	254,100	254,100
Accumulated amortisation	(254,100)	(254,100)
Net carrying value	-	-
11 Trade and Other Payables		
CURRENT		
Accounts payables	4,764,745	5,405,092
Prize money	327,207	311,021
Accruals	370,076	686,407
	5,462,028	6,402,520

All amounts are short term and the carrying values are considered to be a reasonable approximation of fair value.

12 Borrowings		
CURRENT		
Lease liability	-	253,591
NON-CURRENT		
Lease liability	-	11,690
13 Reserves		
GENERAL RESERVE		
The general reserve of \$676,386 (2018: \$676,386) records funds set aside for future expansion of Greyhound Racing New South Wales.		

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
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	2019	2018
	\$	\$
14 Operating lease commitments		
Non-cancelable operating lease commitments contracted for but not capitalised in the financial statements:		
Property lease payable:		
No later than one year	522,150	294,990
Later than one year but not later than five years	1,163,204	-
	1,685,354	294,990

From 1 August 2018, Greyhound Racing New South Wales entered into a lease agreement for premises located at 1 Oxford Street, Darlinghurst, NSW, 2010. The term of the lease is 5 years with an option to renew of an additional 5 years. Annual rent excluding GST is \$508,260 with a fixed 4% increase per annum.

15 Provisions						
CURRENT						
Make good provision				123,780	102,544	
Annual leave				387,619	687,826	
Long service leave				77,840	110,565	
Other provision				41,979	8,957	
				631,218	909,892	
NON-CURRENT						
Long service leave				52,987	115,864	
Analysis of provisions		Make good provision	Annual leave	Long service leave	Other provision	Total
		\$	\$	\$	\$	\$
Balance at 30 June 2019		123,780	387,619	130,827	41,979	684,205

The provision for employee benefits represents amounts accrued for annual leave.

Based on past experience, the entity expects the full amount of annual leave balance to be settled within the next 12 months. Further, these amounts must be classified as current liabilities since the entity does not have an unconditional right to defer the settlement of these amounts in the event employees wish to use their leave entitlements.

16 Financial Risk Management

The entity's financial instruments consist mainly of deposits with banks, local money market instruments, short-term investments, accounts receivable and payable, and leases.

The carrying amounts for each category of financial instruments, measured in accordance with AASB 9 as detailed in the accounting policies to these financial statements, are as follows:

Financial Assets		
Cash and cash equivalents	5,680,843	10,125,774
Loans and receivables	24,548,309	23,255,568
Total financial assets	30,229,152	33,381,342
Financial Liabilities		
Financial liabilities at amortised cost		
Trade and other payables	5,462,028	6,402,520
Total financial liabilities	5,462,028	6,402,520

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
ABN 61 018 166 136

17 Key Management Personnel Disclosures

The totals of remuneration paid to key management personnel (KMP) of the entity during the year are as follows:

	2019	2018
	\$	\$
Key management personnel compensation	2,170,781	2,124,311

18 Contingencies

In the opinion of those charged with Governance, the entity did not have any contingencies at 30 June 2019 (30 June 2018: None).

19 Related Parties

The entity's main related parties are as follows:

(i) Key management personnel:

Any person(s) having authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly, including those charged with Governance (whether executive or otherwise) of that entity are considered key management personnel.

For details of remuneration disclosures relating to key management personnel, refer to Note 17: Key Management Personnel Disclosures.

Other transactions with KMP and their related entities are shown below.

Transactions with related parties

Transactions between related parties are on normal commercial terms and conditions no more favourable than those available to other parties unless otherwise stated.

GRNSW has a receivable from Greyhound Media Services Pty Ltd totaling \$519,334 which arose as a result of media services provided by GRNSW.

20 Events Occurring After the Reporting Date

No matters or circumstances have arisen since the end of the financial year which significantly affected or may significantly affect the operations of the entity, the results of those operations, or the state of affairs of the entity in future financial years.

21 Company Details

The registered office and principal place of business of the company is:

Greyhound Racing New South Wales
Level 23
1 Oxford Street
Darlinghurst NSW 2010

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
ABN 61 018 166 136

DECLARATION BY THOSE CHARGED WITH GOVERNANCE

Those charged with governance of Greyhound Racing New South Wales declare that:

1. The financial statements and notes, as set out on pages 22 to 35
 - a. comply with Accounting Standards - Reduced Disclosure Requirements; and
 - b. give a true and fair view of the financial position as at 30 June 2019 and of the performance for the year ended on that date of the entity.
2. In the opinion of those charged with Governance, there are reasonable grounds to believe that the entity will be able to pay its debts as and when they become due and payable.

This declaration is made in accordance with a resolution of those charged with governance of Greyhounds Racing New South Wales.

Dated this 29th day of October 2019

AUDITOR'S INDEPENDENCE DECLARATION

As lead auditor for the audit of the financial report of Greyhound Racing NSW for the year ended 30 June 2019, I declare that, to the best of my knowledge and belief, there have been no contraventions of:

- (i) the auditor independence requirements of the Accounting and Professional Ethics Standards Board in relation to the audit; and
- (ii) any applicable code of professional conduct in relation to the audit.

RSM AUSTRALIA PARTNERS

DAVID TALBOT

Director

Sydney, NSW

Dated: 29 October 2019

FINANCIAL STATEMENTS

GREYHOUND RACING NEW SOUTH WALES
ABN 61 018 166 136

INDEPENDENT AUDITOR'S REPORT To the Members of Greyhound Racing New South Wales

OPINION

We have audited the financial report of Greyhound Racing New South Wales (the Company), which comprises the statement of financial position as at 30 June 2019, the statement of comprehensive income, the statement of changes in equity and the statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies, and the directors' declaration.

In our opinion, the accompanying financial report of the Company is in accordance with the Corporations Act 2001, including:

- (i) giving a true and fair view of the Company's financial position as at 30 June 2019 and of its financial performance for the year then ended; and
- (ii) complying with Australian Accounting Standards – Reduced Disclosure Requirements and the Corporations Regulations 2001.

BASIS FOR OPINION

We conducted our audit in accordance with Australian Auditing Standards. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Report section of our report. We are independent of the Company in accordance with the auditor independence requirements of the Corporations Act 2001 and the ethical requirements of the Accounting Professional and Ethical Standards Board's APES 110 Code of Ethics for Professional Accountants (the Code) that are relevant to our audit of the financial report in Australia. We have also fulfilled our other ethical responsibilities in accordance with the Code.

We confirm that the independence declaration required by the Corporations Act 2001, which has been given to the directors of the Company, would be in the same terms if given to the directors as at the time of this auditor's report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

OTHER INFORMATION

The directors are responsible for the other information. The other information comprises the information included in the Company's annual report for the year ended 30 June 2019, but does not include the financial report and the auditor's report thereon.

Our opinion on the financial report does not cover the other information and accordingly we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial report, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial report or our knowledge obtained in the audit or otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

RESPONSIBILITIES OF THE DIRECTORS FOR THE FINANCIAL REPORT

The directors of the Company are responsible for the preparation of the financial report that gives a true and fair view in accordance with Australian Accounting Standards – Reduced Disclosure Requirements and the Corporations Act 2001 and for such internal control as the directors determine is necessary to enable the preparation of the financial report that gives a true and fair view and is free from material misstatement, whether due to fraud or error.

In preparing the financial report, the directors are responsible for assessing the ability of the Company to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

AUDITOR'S RESPONSIBILITIES FOR THE AUDIT OF THE FINANCIAL REPORT

Our objectives are to obtain reasonable assurance about whether the financial report as a whole is free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Australian Auditing Standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this financial report.

A further description of our responsibilities for the audit of the financial report is located at the Auditing and Assurance Standards Board website at: http://www.auasb.gov.au/auditors_responsibilities/ar4.pdf. This description forms part of our auditor's report.

DAVID TALBOT

Director

RSM Australia Pty Ltd

Sydney, 29 October 2019

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1-3 Auburn Road
Auburn NSW 2144

The 2019 GRNSW Annual Report is also available online at www.grnsw.com.au



ANNEXURE C

Government-funded Projects

No	Project	Cost	FY
1	Gosford track remediation	\$ 762,570.00	2018/19
2	Gunnedah track remediation	\$ 480,000.00	2018/19
3	Gunnedah (variation)	\$ 198,350.00	2018/19
4	Tamworth track remediation	\$ 173,720.00	2018/19
5	Wentworth Park track and infrastructure	\$ 552,895.00	2018/19
6	Taree air conditioning	\$ 50,000.00	2018/19
7	Wauchope air conditioning	\$ 31,820.00	2018/19
8	Kempsey air conditioning	\$ 12,785.00	2018/19
9	Grafton	\$ 4,686,550.00	2020/21
10	Bathurst track irrigation works	\$ 210,167.00	2019/20
11	Richmond straight track	\$ 499,500.00	2020/21
12	Kempsey infrastructure works	\$ 23,289.00	2018/19
13	Maitland emergency works	\$ 75,400.00	2020/21
14	The Gardens (safety rail)	\$ 49,500.00	2020/21
15	Taree (Camber and lure)	\$ 122,800.00	2020/21
16	Richmond (Kennel) Extension	\$ 282,475.00	2019/20
17	Muswellbrook	\$ 797,950.00	In progress
18	Casino (lighting)	\$ 271,667.50	2021/22
20	Taree (track safety)	\$ 105,000.00	2020/21
21	Wauchope (Track & Safety)	\$ 360,000.00	2020/21
22	Coonamble (Starting box)	\$ 48,401.00	2021/22
23	Thirlmere	\$ 278,748.00	In progress
24	Temora (Vet room)	\$ 22,707.00	2020/21
25	Temora (457m Start)	\$ 14,589.00	2021/22
26	Bulli	\$ 124,945.32	2020/21
27	Coonamble (Kennel Air-Conditioning)	\$ 61,880.00	2021/22
28	Dubbo (Track Surface Drainage)	\$ 136,091.36	2021/22
29	Temora (Kennel Air-Conditioning)	\$ 118,650.99	2021/22
30	Richmond (Track & Safety Upgrade)	\$ 696,500.00	2021/22
31	Broken Hill	\$ 32,692.00	2022/23