

27 February 2014

Parliament House  
Macquarie Street  
Sydney  
NSW 2000  
Via email: [greyhoundracing@parliament.nsw.gov.au](mailto:greyhoundracing@parliament.nsw.gov.au)

Dear Sir/Madam,

**Inquiry into greyhound racing in NSW - Additional information**

Thank you for the opportunity to provide a supplementary submission to the Inquiry into greyhound racing in NSW.

The welfare of greyhounds is very important and the RSPCA suggests that the Committee make strong recommendations to urgently address the various animal welfare issues associated with the industry. Significant overbreeding problems, high wastage rates, high euthanasia rates, high injury rates, low rehoming rates and inadequate housing conditions (lack of socialisation, environmental enrichment, human handling and habituation) among other welfare issues, must be urgently addressed.

A combination of strategies is required to promptly and effectively address these significant problems. Strategies targeting the underlying source of the problems and expansion of initiatives to improve the image of greyhounds as pets such as the Greenhounds program are vital for improvements to occur.

Please find RSPCA answers to the questions on notice and supplementary questions attached. RSPCA feedback on Inspectorate related issues will be forwarded very shortly.

Yours sincerely,



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## Section 1: Greyhound Racing NSW and Greyhound Racing Victoria joint Animal Welfare Strategy

### Additional questions

6. *Was the RSPCA consulted regarding the development of the joint Greyhound Racing NSW and Greyhound Racing Victoria joint Animal Welfare Strategy released on Wednesday 5 February?*

The RSPCA was not consulted regarding the development of the joint Greyhound Racing NSW and Greyhound Racing Victoria joint Animal Welfare Strategy released on Wednesday 5 February.

7. *If so, what was the nature of this consultation?* N/A

8. *Can the RSPCA please provide an assessment of the Animal Welfare Strategy, specifically whether the strategy will address concerns raised in the RSPCA's submission, including:*

*a. Overbreeding in the industry*

The industry strategy does not adequately address the significant overbreeding problem. A combination of strategies is required to effectively reduce the number of greyhounds born each year in New South Wales. The strategy does not include various critical initiatives that are necessary to effectively address overbreeding. Comprehensive detail for each strategy with targets and timeframes are also necessary. Please see attached Section 2: Strategies to address overbreeding in the Greyhound racing Industry for detailed recommendations regarding strategies to reduce overbreeding.

*b. Rates of euthanasia*

To address the current high euthanasia rates the source of the problem must be addressed. Significant overbreeding and poor breeding, rearing, training and housing conditions contribute to high wastage rates which in turn cause high euthanasia rates.

Please see all relevant attached sections for information about how to address the underlying causes of high euthanasia rates.

*c. Adequacy of industry rehoming efforts*

Current industry rehoming efforts are inadequate as they do not address the source of the low rehoming rate. The industry strategy does not adequately address concerns regarding the low rehoming rate.

To increase rehoming rates it is critical to address the underlying problems. These include overbreeding, high wastage rates and the inadequate conditions under which many greyhounds are bred, reared and trained. A thorough review of the current rearing, breaking, handling and housing techniques would greatly improve the success of greyhound adoption programs and ultimately work towards reducing the currently unacceptable high levels of wastage.

The mass overbreeding problem creates a situation whereby rehoming programs cannot possibly cope with the excessive number of greyhounds moving through the system each year. Furthermore, poor breeding practices, a lack of socialisation, human handling, environmental enrichment and habituation can have long-term behavioural consequences for many greyhounds which can affect welfare and performance and the suitability of many greyhounds for rehoming.

Therefore to increase rehoming rates a number of strategies to address the overbreeding problem and improve breeding, rearing and training conditions must be employed in addition to significantly increasing the resources for rehoming programs (both Industry-associated and reputable non-Industry associated greyhound rehoming programs).

The RSPCA supports the Greenhounds green collar program in principle and suggests that this program is accelerated. Muzzling of greyhounds may cause public misperceptions about the suitability of greyhounds as pets. Other initiatives to raise awareness about greyhounds as pets would also assist in improving the image of greyhounds as pets and increase market demand for greyhounds as pets.

Please see all following sections for information about how to address the underlying causes of low rehoming rates for more information.

*d. Incidences of injury*

The strategy does not appear to mention activities to reduce injuries to greyhounds. Injuries are a key animal welfare issue for Australian greyhounds as they cause pain, suffering and distress to greyhounds and are often of a serious nature sometimes leading to death or euthanasia. Injuries occur at an unacceptably high rate. The Committee should call for an immediate review of all track designs across NSW to examine links between the design of the tracks and type of injuries. Major infrastructure works and the development of a comprehensive injury database with reporting are further recommendations.

Injury data should be published for each track in NSW, currently injury data information is not published for many tracks. It is also important to include in each Stewards report what the ultimate outcome was for any injured greyhounds including whether the greyhound died; was euthanased; suspended or retired (and what the ultimate outcome was upon retirement - euthanasia, rehoming as a pet etc). Targets and timeframes should be included in the strategy to ensure injury incidence rates are reduced in a timely way.

*e. The lack of comprehensive published data*

Targets and timeframes should be applied to data publication. Data regarding the exact number of puppies born, the exact number of greyhounds named and the outcome for each individual greyhound (rehomed as a pet, euthanased etc) needs to be included. National co-ordination of data collection and publication is necessary to effectively track greyhounds that move interstate. The strategy should provide further detail about data collection and timeframes for publication of the data.

**Further RSPCA comments on the Greyhound Racing NSW (GRNSW) and Greyhound Racing Victoria (GRV) joint animal welfare strategy**

RSPCA Australia welcomes the GRV/GRNSW joint animal welfare strategy. While some of the proposals appear to be good steps forward the RSPCA has a number of concerns regarding the strategy and considers that the strategy does not adequately address the extensive animal welfare issues. The strategy is brief in content and lacks sufficient detail. Comprehensive information about each individual part of the strategy should be published. Without further detail it is unclear exactly how some of the general ideas presented may effectively improve greyhound welfare in a timely manner.

The strategy does not address the key welfare issues associated with current breeding, rearing, kennelling and training practices. The strategy should directly acknowledge and address the lack of socialisation, environmental enrichment, human handling and habituation inherent in current practices. Significant changes to the way in which greyhounds are bred, reared, trained and housed must occur to improve welfare and performance and hence reduce wastage, overbreeding and euthanasia.

It is stated that the joint strategy is intended to be fully implemented over the next three years. Timeframes and targets for each individual part of the strategy should be published.

The strategy does not mention the welfare of other animals associated with greyhound racing. Animals/animal carcasses should not be used in the training of greyhounds and industry should include this as part of their welfare strategy. Furthermore the strategy does not mention the key welfare issue of the export of Australian greyhounds. The RSPCA calls for a prohibition on the export of greyhounds except where the greyhound is accompanying their owner as a companion animal only.

### Specific comments

1. 'Move towards all greyhounds having to be under the care of a Registered Participant at all times during their lifecycle, unless retired as a pet' states:

*This initiative will require licensing of people currently involved in the greyhound lifecycle who may not currently be licensed participants - i.e. contract whelpers, rearers etc.*

A greyhound should become a licensed animal the day its whelping notice (notification of a result of service) is in, not at marking up or naming. Thus a greyhound must be under the care of a licensed person at all stages of its lifecycle until retirement.

2. 'Introduce a national approach to breeding to further reduce the number of unsuitable greyhounds being bred, and to ensure the decision to breed a litter of greyhounds is a considered one' states:

*Introduction of processes to ensure breeders new to breeding greyhounds are provided with education PRIOR to any services occurring;*

In the RSPCA's view all breeders, not just new breeders should be provided with education prior to any services occurring and prior to being able to obtain a license. Significant overbreeding and poor breeding practices as evidenced by high rejection rates and high wastage rates indicates that current breeders need to urgently improve their practices, not just new participants.

Breeders should be required to demonstrate knowledge and competency prior to being licensed.

3. 'Maximising opportunities for all greyhounds to reach their full potential' states:

*Protection of young, growing greyhounds through the introduction of strategies aimed at all stages from litter registration to racing. This includes registration, inspection and star rating of all rearing properties, breaking in facilities and pre-training establishments.*

Details about what these strategies entail should be provided. Breeders, contract whelpers and training establishments should be included under registration and inspection.

It is not clear what the star rating will be based on. All places keeping greyhounds must meet enforceable standards. In addition, the performance success rates and rehoming success rates of establishments should be examined.

4. 'End of career alternatives' states:

*To continue to implement specific and innovative changes that will ensure that the industry Greyhound Adoption Program's (GAP's) are continuing to operate in the most effective manner possible to meet industry demands;*

This section should acknowledge how inadequate breeding, rearing, kennelling and training practices negatively affect the suitability of greyhounds for rehoming. Current practices involve poor breeding practices and a lack of socialisation, human handling, environmental enrichment and habituation. These problems result in stress and long-term behavioural issues such as generalised fear and anxiety for many greyhounds which act as a barrier to adoption as some greyhounds are not suitable for rehoming. Addressing the source of the rehoming problem is key to increasing rehoming rates.

Industry should focus on accelerating the Greenhounds green collar program as an important complementary activity to improve rehoming rates and community acceptance of greyhounds as pets

5. 'Maximising racing opportunities for all Greyhounds' states:

*Ensure that the racing calendars throughout the states provide ample racing opportunities for greyhounds of all grades, ages and abilities and through co-operation, facilitate the movement of greyhounds between states based on ability to maximise the chances of a greyhound having a long racing career.*

Data collection systems must be nationally co-ordinated so that if a greyhound moves interstate they can still be tracked and data recorded regarding the outcome for that greyhound including euthanasia, rehoming as a pet etc

6. 'End of career alternatives' states:

*Increase data collection at the time of retirement - aimed at capturing information about the entire lifecycle of the greyhound; and*

*Collation and monitoring of national data regarding greyhounds at each stage of the lifecycle - including retirement and euthanasia statistics so that the success of various strategies can be assessed.*

It is unclear whether the data collected will only apply to 'named' greyhounds or all greyhounds born. It is critical for comprehensive data on greyhound outcomes to be collected and published for all greyhounds born including all 'unnamed' greyhounds which are a particularly vulnerable population.

7. 'People/Participants, National approach to education' states:

*Develop formal education modules on relevant topics for delivery to all participants, including the option of progressing to the completion of a formal qualification of Certificate 2 in Racing (Greyhounds) through the national Vocational and Education framework;*

Key stakeholders should be consulted in the development of the education modules to ensure best practice standards are attained. Current breeding, rearing, kennelling and training practices are inadequate. Poor breeding practices and a lack of socialisation, environmental enrichment, human handling and habituation throughout all life stages leads to serious welfare problems and poor performance (high wastage). These problems in turn lead to overbreeding to compensate for low success rates, high euthanasia rates and low rehoming rates.

This section also states:

*All new participants to be assessed on core competencies before obtaining the relevant licence.*

All participants, not just new participants at each stage of the life cycle should be required to be assessed on core competencies before obtaining the relevant licence. Evidence shows that current practices by existing participants are inadequate and lead to welfare problems and poor performance.

8. Registration and Licensing states:

*Introduce a tiered system of trainer licence types which stipulate how many greyhounds trainers are able to train;*

This tiered system stipulating how many greyhounds are permitted should also be applied to breeders, rearers and participants at all other life stages. This strategy will help to reduce the significant overbreeding problem in combination with strategies to improve the quality of the practices.

This section also states:

*Ongoing licensing by peak bodies to be subject to inspection and compliance with maintenance of facility standards.*

This proposal should explain which standards this refers to. Enforceable codes of practice (standards) stipulating the minimum standards should be developed with

key stakeholder consultation for all life stages including breeding (including whelping), rearing and training (kennelling) etc. Key stakeholders should include animal welfare organisations, the Australian veterinary Association and other groups such as the Greyhound Rehoming Centre (Dr Karen Cunnington).

9. Inspection & compliance states:

*All facilities at which greyhounds are housed with licensed people, throughout their lifecycle, to be subject to regular inspection;*

This proposal requires more detail. It is not clear how often 'regular' inspections will take place. An inspection should be undertaken prior to issuing any license for each life stage. Inspections should occur at least twice a year and compliance with codes of practice a condition of keeping a license.

Enforceable codes of practice (standards) should be developed for all life stages including breeding, rearing and the code for training (kennelling) reviewed, in consultation with key stakeholders (please see point 6). Compliance with these standards should be made a condition of licensing. Audits/inspections should be independent.

This section also states:

*All new facilities/kennels to be compliant with relevant codes of practice as well as Council and Government requirements.*

All facilities/kennels, not just new facilities/kennels must comply with the enforceable codes of practice (standards).

Current facilities have been identified as inadequate and requiring significant changes in order to meet acceptable animal welfare standards and to effectively address the overbreeding, wastage, euthanasia and rehoming problems.

## Section 2: Strategies to reduce overbreeding in the Greyhound racing Industry

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A combination of strategies is required to effectively reduce the number of greyhounds born each year in New South Wales. Targets and timeframes should be applied and published to ensure strategies are effective and timely.

Significant changes must be made to the way in which greyhounds are kept at each life stage (breeding, rearing and training etc) to improve greyhound welfare. A lack of socialisation, environmental enrichment, human handling and habituation has a negative impact on greyhound welfare leading to generalised fear and high levels of stress for many greyhounds<sup>1</sup>. Studies show a direct link between welfare and performance<sup>2</sup>. Stressed dogs tend to perform poorly during training and have compromised learning ability. Stress also suppresses immune system function predisposing dogs towards health problems affecting their working ability.

Improving welfare and hence performance will in turn help to reduce rejection rates (wastage). Reducing rejection rates will reduce the pressure to breed more greyhounds to replace unsuccessful greyhounds and this in part will help to address the overbreeding problem. However, strategies to increase success rates for the greyhounds born still need to be combined with other strategies directly focused on limiting the number of greyhounds born. The strategies below will also help to increase the likelihood of greyhounds being suitable for re-homing.

Welfare involves meeting the physical, behavioural and social needs of the animal but also involves ensuring positive emotional states<sup>3,4</sup>. Standards should promote positive emotional states and minimise stress.

#### 1. Improve the quality of breeding programs

Strategies to improve the quality of breeding programs should focus on issues including:

- Avoiding inbreeding.
- Avoiding inherited diseases.
- Avoiding injury prone lines.
- Breeding methods should be reviewed. Concerns have been raised about the use of artificial insemination and the impacts on the breeding female, puppies and the number of puppies in each litter.
- Breeding programs should be based on veterinary advice.

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<sup>1</sup> Cunnington K (2013) Racing to retirement - is there a better way? Greycare, Working Dog Conference.

<sup>2</sup> Rooney N, Gaines S and Hiby E (2009) A practitioner's guide to working dog welfare, *Journal of Veterinary Behavior*, 4: 127-134

<sup>3</sup> Yeates JW and Main DCJ (2008) Assessment of positive welfare: A review *The Veterinary Journal* 175(3): 293-300.

<sup>4</sup> Boissy A *et al.* (2007) Assessment of positive emotions in animals to improve their welfare *Physiology & Behavior*, 92 (3):375-397.

- Careful and well-informed selection of suitable parent dogs. Selection of suitable parents should be based on both physical and behavioural (temperament) characteristics. Note for example that anxiety is heritable.
- Living conditions for breeding animals and puppies must meet their physical, social and behavioural needs. Conditions should promote positive emotional states and minimise stress.
- Breeders and contract whelpers should be required to undertake compulsory education courses and demonstrate their knowledge and competency prior to being able to register as a breeder or contract whelper. Continuing education of participants should be required to keep up to date with the latest knowledge and best practice.

## 2. Breeding limitation strategies

Strategies to reduce the number of greyhounds born should be applied in combination with strategies to improve the quality of breeding programs. For example, introduce a maximum number of litters permitted for each breeding female attached to registration conditions.

The recently released GRV/GRNSW joint animal welfare strategy includes the introduction of a tiered system of trainer licence types which stipulate how many greyhounds trainers are able to train. This tiered system stipulating how many greyhounds are permitted should also be applied to breeders, whelpers, rearers and all other life stages. Targets and timeframes should be applied so that the greyhound industry has clear and public targets for the reduction in the number of litters and they report their progress against these.

## 3. Improve living conditions at each life stage

Current living conditions for most dogs at each life stage do not meet the physical, behavioural or social needs of greyhounds, thereby compromising their welfare. A lack of socialisation, environmental enrichment, human handling and habituation has a negative impact on greyhound welfare leading to generalised fear and high levels of stress for many greyhounds.

Enforceable standards in a code of practice should be developed for greyhounds at all life stages in consultation with key stakeholders including animal welfare organisations (RSPCA), the Australian Veterinary Association and other groups such as the Greyhound Rehoming Centre (Dr Karen Cunningham). This code should cover all life stages rather than a separate code of practice for each life stage.

The code should include that a greyhound should become a licensed animal the day its whelping notice (notification of a result of service) is in, not at marking up or naming. Thus a greyhound must be under the care of a licensed person at all stages of its lifecycle until retirement.

Please see the attached Section 3: Greyhound Code of Practice (enforceable standards for each life stage) for detailed information regarding enforceable standards for each life stage detailed in a code of practice for greyhounds:

1. Puppies from birth up to 12 weeks of age
2. Rearing (12 weeks of age - 12/15 months of age)
3. Training (from 12-15 months of age)
4. Breeding animals



#### 4. Improve Training methods

The RSPCA supports reward-based dog training involving positive reinforcement. Reward-based training is the most humane and effective training method<sup>5</sup>. Reward-based training is enjoyable for the dog, positively enhances the relationship bond between the dog and handler and avoids undesirable behavioural side effects. Studies show that reward-based training can increase performance.

The RSPCA does not support training programs based on aversive stimuli, dominance, force or punishment. These training methods can elicit generalised fear and heighten anxiety leading to decreased confidence, depression, overexcitement, fear aggression, learning problems, decreased motivation and a reluctance to try new behaviours for fear of punishment<sup>5,6</sup>. This compromises welfare and also has a negative impact on performance/ability and therefore should be avoided.

The RSPCA believes that animals/animal carcasses should not be used in the training of greyhounds. Other rewards such as toys, attention and food treats should be used instead.

#### 5. Compulsory education strategies

All participants (not just new participants) should be required to undertake education courses prior to registration and licensing for each life stage: breeding, whelping, rearing and training etc. Participants should be required to demonstrate their knowledge and competency prior to being registered/licensed. Continuing education for industry participants is essential in order that they keep up to date with new ideas and best practices. Education courses should be developed and undertaken with external key stakeholder input and include information about the relevant codes for each life stage.

It should be noted that while education is an integral part of reducing the number of greyhounds born and improving welfare, it is not sufficient alone and needs to be combined with other strategies.

#### 6. Licensing and Inspection at all life stages

A licensing and inspection regime should be introduced for each life stage: breeding, (including whelping) rearing and training etc.

Inspection of facilities should occur prior to issuing a license. Adherence with enforceable standards for each life stage detailed in a code of practice for greyhounds should be made a condition of licensing.

Independent audits/inspections should occur at least twice a year and ongoing compliance with the code of practice must be mandatory in order to maintain a license.

#### 7. Strategies to extend the career of racing greyhounds

Currently the racing career for greyhounds is very short. Dogs who do have a racing career usually start racing at about one and a half years of age and are generally retired by three to five years of age. The industry should regularly examine and implement strategies to extend the racing career for greyhounds in order to reduce breeding pressure.

Notwithstanding the racing career of an individual dog, it should be an expectation within the industry that each greyhound will be rehomed as a family pet after retirement.

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<sup>5</sup> Australian Veterinary Association (2011) Reward-based training: a guide for dog trainers.

<sup>6</sup> Rooney N, Gaines S and Hiby E (2009) A practitioner's guide to working dog welfare, *Journal of Veterinary Behavior*, 4: 127-134

### Section 3: Greyhound Code of Practice (enforceable standards for each life stage)

#### Additional questions

4. *Is it correct that the existing Greyhound Racing NSW Codes of Practice do not cover the whole life of a greyhound?*

The current GRNSW Code of Practice - for the Keeping of Greyhounds in Training covers the training part of the greyhound lifecycle.

Enforceable standards are needed to cover each life stage including breeding and rearing and all other stages such as 'whelping', 'education', 'breaking in' 'trailing' and 'pre-training' etc

- a. *Can you comment on the impacts this lack of comprehensive focus has on the welfare of animals?*

Detailed enforceable standards are needed to ensure acceptable standards of care are provided for all greyhounds throughout each life stage. Specific requirements are needed at each life stage necessitating specific standards relevant to that context. In addition, there are life stages that are specific to greyhounds only, for example, there are no other codes to reference for greyhound 'rearing'. Furthermore the current code for training does not meet acceptable dog welfare standards. Please see the following information regarding training housing conditions and attached Section 4: RSPCA comments on the current GRNSW Code for training.

Enforceable standards are also necessary for participant education and licensing. Without any standards to reference, welfare will be compromised and this is evidenced in the various animal welfare issues currently associated with the greyhound racing industry including inadequate rearing and housing conditions.

- b. *How can this situation be corrected? What should be included in separate Codes of Practice covering the breeding, rearing and education of greyhounds?*

Enforceable standards in a Code of practice should be developed for greyhounds at all life stages in consultation with key stakeholders including animal welfare organisations (RSPCA), the Australian Veterinary Association and other groups such as the Greyhound Rehoming Centre (Dr Karen Cunningham).

A detailed overarching Code of Practice (COP) for keeping a licensed animal at all stages of its lifecycle is recommended rather than a separate COP for each life stage. A greyhound should become a licensed animal the day its whelping notice (notification of a result of service) is in, not at marking up or naming. Thus a greyhound must be under the care of a licensed person at all stages of its lifecycle until retirement. The issuing of a license should be based on compliance with the standards. See Section 2: Strategies to reduce overbreeding.

The current NSW Animal Welfare Code of Practice Breeding dogs and cats could be used as a reference in the development of greyhound specific standards however this would need to be in combination with other resources and information and stakeholder input to ensure best practice standards for greyhounds.

#### Greyhound Code of Practice (enforceable standards for each life stage)

Note that the lines between the life stages can be blurred at times for example 'breaking-in' may occur at the rearing property or 'whelping' might occur at the breeding facility.

The following provides a general overview of the main life stages and ages involved.

## **1. Puppies from birth to 12 weeks of age**

Evidence shows that many greyhound puppies do not receive adequate socialisation, human handling, environmental enrichment or adequate exposure to novel stimuli from birth to 12 weeks of age. Significant changes to the way in which greyhounds are raised must occur to improve welfare and this may also enhance performance.

Dogs have a critical socialisation period (3-17 weeks of age). During this time it is very important to provide puppies with positive and safe experiences with a variety of people, places, other dogs, objects, sights and sounds and other novel stimuli. Experiences during this period influence a dog's behaviour throughout its life. Adequate socialisation has been shown to decrease inter-dog reactivity and fearfulness of people, places and situations<sup>7</sup>. If dogs are deprived of adequate socialisation they are more likely to develop fearfulness and antisocial behaviour which impacts negatively on welfare, performance and the ability to rehome retired/unwanted greyhounds. Providing socialisation will help to increase success rates, reduce wastage and in part help to reduce breeding rates.

Some of the important strategies to improve conditions for puppies up to 12 weeks of age include:

- The provision of adequate and appropriate socialisation with humans, greyhounds and other types of compatible dogs in safe environments. Other dogs should be healthy, up to date with their vaccinations and friendly.
- Sufficient daily positive human contact and handling.
- Exposure to novel stimuli in a positive way. Stimuli should include objects, sights, sounds, scents and places that the dogs will likely encounter as they grow older. Determining where and when it is safe to take puppies to different places in relation to their vaccination status and infectious disease should be based on veterinary advice.
- Daily environmental enrichment to provide physical and mental stimulation and to allow the expression of natural behaviours.
- Appropriate daily opportunities to explore and exercise in safe environments.
- Sufficient housing space to move about.
- Adequate shelter and a comfortable sleeping area.
- Appropriate and balanced nutrition. The provision of safe items for chewing.

## **2. Rearing programs (12 weeks of age - 12/15 months of age)**

Evidence shows that current rearing conditions do not meet the social or behavioural needs of many greyhounds. Greyhounds are often reared in isolated, open paddocks with minimal human handling. Lack of socialisation, human handling, environmental enrichment and exposure to novel stimuli during the rearing period has been shown to result in generalised fearfulness and stress for many greyhounds<sup>8</sup>. Fear compromises dog welfare but also negatively impacts on performance and contributes to high wastage rates. A lack of socialisation during the rearing phase can cause long-term behavioural problems which can affect the suitability of greyhounds for rehoming.

Significant changes to the way in which greyhounds are reared must occur to improve welfare and reduce wastage.

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<sup>7</sup> Australian Veterinary Association (2011) Reward-based training: a guide for dog trainers.

<sup>8</sup> Cunnington K (2013) Racing to retirement - is there a better way? Greycare, Working Dog Conference.

Some of the important strategies to improve rearing conditions should include:

- Adequate and appropriate socialisation with humans, greyhounds and other types of compatible dogs. Other dogs should be healthy, up to date with their vaccinations and friendly.
- Sufficient daily positive human contact and handling.
- Exposure to novel stimuli in a positive way including objects, sights, sounds, scents and places that the dogs will likely encounter as they grow older.
- Daily environmental enrichment to provide physical and mental stimulation and to allow the expression of natural behaviours. Studies show that working dogs perform better with environmental enrichment and that environmental enrichment does not have a negative impact on performance<sup>9</sup>.
- Daily opportunities to exercise in safe areas outside the area they are normally housed in.
- Daily opportunities to safely explore and investigate familiar and unfamiliar environments. Dogs live in a world dominated by smell. Seeking and exploring new areas and scents are basic behavioural requirements for dogs.
- Veterinary advice should be sought when determining where and when it is safe to take puppies to different places/environments in relation to their vaccination status and infectious disease.
- The provision of safe chew items each day to promote dental health and to allow the expression of natural chewing behaviour. For example, chew toys and food-filled Kong toys. Human-grade raw meaty bones may be offered once a week, please see the RSPCA Australia knowledgebase for safety tips: <http://kb.rspca.org.au/>
- Chewing is a natural behaviour that reduces stress. The delivery of chew items must be predictable each day.
- Appropriate and balanced nutrition.
- Sufficient space to move about.
- Adequate shelter and a comfortable sleeping area

### **3. Training (from 12-15 months of age)**

Many greyhounds are kept in kennels during training. Extensive evidence shows that kennelling is very stressful for dogs<sup>10</sup>. Dogs entering kennels demonstrate high levels of stress reflected in their behaviour and physiological cortisol responses. Stress compromises welfare and negatively impacts on performance. Kennelling should be avoided where ever possible however, where kennelling is unavoidable significant changes must be made to the way in which greyhounds are kennelled.

The following is applicable to kennels and other types of housing used during training.

Some of the important strategies to improve conditions during training:

- Where kennelling is unavoidable gradual introduction to kennels can reduce stress. Habituation involves the gradual introduction of dogs to the kennel environment using a program involving positive rewards. Caretakers and trainers should start at a level where the dog shows no anxiety

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<sup>9</sup> Rooney N, Gaines S and Hiby E (2009) A practitioner's guide to working dog welfare, *Journal of Veterinary Behavior*, 4: 127-134

<sup>10</sup> Rooney N, Gaines S and Hiby E (2009) A practitioner's guide to working dog welfare, *Journal of Veterinary Behavior*, 4: 127-134

and then increase slowly, giving lots of rewards when the dog shows relaxed and positive behaviour.

Selection, or breeding of individual dogs that have been shown to adapt well to the kennel environment, is a long-term strategy that may also help to minimise the stress experienced by dogs.

- Minimise the time spent in kennels each day to reduce stress. Dogs become attached to people they interact with regularly, and many dogs exhibit separation-related reactions (indicating poor welfare) when their caretaker is absent. Caretakers should aim to spend as much time as possible with their dog(s), giving it regular exercise and positive interaction (play, grooming, patting etc)<sup>10</sup>.
- Daily exercise outside the kennel/housing area. Exercise with other compatible dogs is ideal.
- Daily opportunities to safely explore and investigate familiar and unfamiliar environments. Dogs live in a world dominated by smell. Seeking and exploring new areas and scents are basic behavioural requirements for dogs.
- Daily positive social contact with humans. Human contact is very rewarding for dogs. Caretakers should set aside time for interacting with their dogs each day. This will also help the dog to form close bonds that can enhance their working ability. Caretakers and handlers can increase the amount of contact with their dogs through activities such as grooming, playing, exercise, and patting, in addition to training.
- Daily positive social contact with compatible greyhounds and other types of compatible dogs.
- Daily environmental enrichment. Studies show that working dogs perform better with environmental enrichment and that environmental enrichment does not have a negative impact on performance.
- Daily safe chew items such as Kong toys filled with food and chew toys. Human-grade raw meaty bones may be offered 1-2 times a week, please see the RSPCA Australia knowledgebase for safety tips: <http://kb.rspca.org.au/>

Chewing is a natural behaviour that reduces stress. The delivery of chew items must be predictable each day.

- Consider compatible group or compatible pair housing as social housing can help to reduce stress.
- Predictable routine. Predictable delivery of rewards such as exercise, chew items and daily stress-relieving rewarding activities is important. Animals cope much better in environments that they find predictable. In the case of kennelled dogs, this means a daily routine they can depend on, where rewarding experiences such as going out for walks, feeding, and working are guaranteed to happen, and people are consistent in the way in which they behave and train the dog<sup>11</sup>.
- Raised sleeping area (to provide a vantage point) with bedding for physical and thermal comfort. The majority of current kennel designs are very barren and offer little opportunity for dogs to carry out their natural behaviours. The addition of a sleeping platform can increase the complexity and available three-dimensional space.
- Sufficient space to move about. Maximise kennel size/housing area space.
- Minimise kennel noise.
- Kennel cleaning. Dogs should be moved to another dry area while their kennels are cleaned to reduce stress.

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<sup>11</sup> Rooney N, Gaines S and Hiby E (2009) A practitioner's guide to working dog welfare, *Journal of Veterinary Behavior*, 4: 127-134

#### 4. Breeding animals

Standards for breeding animals should focus on housing conditions for breeding animals and their puppies and the quality of breeding programs. Housing conditions must meet the physical, behavioural and social needs of the animals. Ensuring the emotional well-being of greyhounds is a key component of achieving good welfare. The general principles of daily socialisation, daily exercise, daily environmental enrichment and sufficient space to move about freely etc detailed in the sections above can also be applied to breeding animals. Breeding animals and puppies should not be kept in kennels.

Please also see sections on Strategies to reduce overbreeding in the Greyhound racing Industry including - Improve the quality of breeding programs and Breeding limitation strategies for more detailed information.

## Section 4: RSPCA comments on the current GRNSW Code for training

### Additional questions

5. *What changes, if any, are required to the Code of Practice for the Keeping of Greyhounds in Training to ensure the welfare of dogs in the greyhound racing industry?*

The current GRNSW code of practice for training does not adequately meet the physical, behavioural or social needs of greyhounds. Significant changes to the way in which greyhounds are kept for training must occur as evidence shows that current conditions cause generalised fearfulness, anxiety and high levels of stress for many greyhounds compromising their welfare<sup>12</sup>. Stress and fear have a negative impact on greyhound welfare and performance and therefore contributes to wastage. Studies show a direct link between welfare and performance<sup>4</sup>. Stressed dogs tend to perform poorly during training and have compromised learning ability. Stress also suppresses immune system function predisposing dogs towards health problems which affects their working ability.

The RSPCA recommends an urgent thorough review of the training code to reflect current best practice welfare standards for dogs. Ensuring the conditions meet the emotional well-being of greyhounds is a key component of achieving good welfare. The review should include consultation with key stakeholders including animal welfare organisations (RSPCA), the Australian Veterinary Association and other groups such as the Greyhound Rehoming Centre (Dr Karen Cunnington).

### Specific RSPCA comments on the current GRNSW Code for training

Please see the attached Section 3: Greyhound Code of Practice (enforceable standards for each life stage) for detailed information about housing conditions during training (point 3).

#### Maximise kennel size

The current GRNSW training code allows existing registered kennels to be exempt from Section 2.2 which contains minimum dimensions. This exemption should be removed.

Enclosure sizes/housing space should be maximised.

#### Transport of racing greyhounds

- The current 6 hour maximum time without water or a break during transport is too long. The time without water or a break should be reduced.
- Air transport should comply with the current IATA Live animal regulations.

#### Humane Death

- The current wording of the code states:  
*When necessary, the method of humane and painless death for any greyhound is a rapid intravenous injection of concentrated barbiturate solution. Such methods of euthanasia must be performed by a veterinarian.*
- The current wording is unclear and suggests that other methods of euthanasia may be acceptable.

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<sup>12</sup> Cunnington K (2013) Racing to retirement - is there a better way? Greycare, Working Dog Conference.

- This section must be amended to state that euthanasia must be performed by a registered veterinarian.

### Training methods

- Training methods must be humane and must not cause injury, pain, suffering or distress to the animal.
- The RSPCA supports reward-based training involving positive reinforcement. Reward-based training is the most humane and effective training method<sup>13</sup>.
- The RSPCA does not support training programs based on aversive stimuli, dominance, force or punishment. These training methods can elicit generalised fear and heighten anxiety leading to decreased confidence, depression, overexcitement, fear aggression, learning problems, decreased motivation and a reluctance to try new behaviours for fear of punishment<sup>13,14</sup>. This compromises welfare and also has a negative impact on performance/ability and therefore should be avoided.
- The code for training should support reward-based training. Reward-based training will improve greyhound welfare and performance.
- The RSPCA believes that animal carcasses should not be used in the training of greyhounds. Other rewards such as toys, attention and food treats should be used instead.

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<sup>13</sup> Australian Veterinary Association (2011) Reward-based training: a guide for dog trainers.

<sup>14</sup> Rooney N, Gaines S and Hiby E (2009) A practitioner's guide to working dog welfare, *Journal of Veterinary Behavior*, 4: 127-134



## Section 5: Swabbing and banned substances

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*Apart from those generalised concerns how would you like the swabbing process changed?*

### Erythropoietin (EPO)

Concerns have been raised that certain substances which have been reported to be given such as erythropoietin (EPO) are not detectable or easily detectable using current routine swabbing procedures. As far as RSPCA is aware EPO detection appears to require blood sampling rather than urine. The RSPCA does not support routine blood sampling of greyhounds to detect banned substances as this is a much more invasive procedure which causes pain to the animal when compared to a voided urine sample which is non-invasive and does not cause any pain.

The industry should be investigating through their own and other research and development (R & D) initiatives, the development of a urine EPO test.

### Anabolic steroids

As far as RSPCA Australia is aware detection of the administration of testosterone to entire female dogs is possible (a threshold exists), however detection of the administration of testosterone to male dogs is an issue using current available methods.

R& D should focus on detection of testosterone in male dogs and the accurate distinction between endogenous testosterone and administered exogenous testosterone.

The Australian Racing Board (ARB) recently introduced a new rule whereby anabolic androgenic steroids are banned from birth. There are no time or therapeutic exemptions. The ban applies to all unregistered juveniles and registered racehorses until their retirement as a racehorse. The Greyhound racing Industry in Australia could introduce the same rule to assist with this issue.

Concerns have also been raised regarding the adequacy of out of competition testing. As far as RSPCA Australia has been advised, swabbing does not extend to rearing properties. Further concerns have also been raised regarding the transparency of the process for choosing swabs. According to the Greyhound Racing Rules, swabbing is at the discretion of the Stewards or, the Controlling Body may direct the Stewards to carry out testing. External independent allocation of swabbing may assist this process. Other aspects such as independent supervision of sample collection and targeted swabbing and randomised swabbing are also relevant.

The RSPCA's main concern is the negative impact that reported substances can have on the physical and/or psychological well-being of the animals.

### Additional questions

5. *How long do detectable levels of metabolites that would be used to detect the use of EPO last in a greyhound?*

As far as RSPCA Australia is aware, typically 20-24 hours and up to 36 hours.

*How long do the effects on the racing ability of a greyhound last?*

As far as RSPCA Australia is aware, while the haematocrit is elevated this may potentially enhance performance. This may be dose-dependent.

*Can the RSPCA provide similar numbers for other commonly used banned performance enhancing substances used on greyhounds?*

The RSPCA is not able to provide this specific information. We recommend that the Committee consult with pharmacological experts specialising in the detection of different substances.



## Section 6: RSPCA Annual Statistics

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RSPCA Annual Statistics for the previous three years are available at this link: <http://www.rspca.org.au/facts/statistics>

The RSPCA receives thousands of unwanted animals each year across Australia. It is important to recognise that the RSPCA does not have any control over the number of animals presented at our shelters nationally. This is in contrast to industries which have the capacity to directly influence animal populations within their own industry.

Unwanted companion animals is a serious animal welfare issue and the RSPCA makes every effort to address this issue through various RSPCA specific initiatives including desexing programs and education, and broader initiatives with key stakeholders and the community. The RSPCA aims to rehome all suitable animals in its care. Animals may be unsuitable for adoption due to health, behavioural or legislative reasons.

The fact that there are many unwanted animals other than greyhounds does not detract from the urgent need to address the serious issue of unwanted greyhounds resulting directly from industry activity. The industry has a responsibility to urgently address the overbreeding, high wastage rates and high euthanasia rates occurring in the greyhound racing industry.