

INQUIRY INTO GREYHOUND RACING IN NSW

Organisation: RSPCA Australia

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The Director
Select Committee on Greyhound Racing in New South Wales
Legislative Council
Parliament House
Macquarie St
Sydney NSW 2000

5 November 2013

Dear Sir/Madam,

Legislative Council Select Committee Inquiry into Greyhound Racing in New South Wales

Thank you for the opportunity to provide a submission to the above inquiry.

RSPCA Australia is opposed to the use of animals for any form of sport or training associated with such use, where injury, suffering or distress is likely to be caused. We are very concerned about a number of serious animal welfare issues associated with greyhound racing in NSW and across Australia that suggest that greyhounds are at significant risk of experiencing injury, suffering or distress as a result of racing and associated activities.

The main areas of concern include overbreeding, wastage, euthanasia and rehoming problems; injuries that cause pain and suffering; significant welfare risks associated with export; administration of banned substances; lack of comprehensive published data; lack of transparency and accountability; microchipping and registration inadequacies; lack of adequate regulation and lack of independent oversight.

Detailed comments on each of these issues are provided in the attached submission, along with recommendations for immediate action to protect the welfare of Australian greyhounds.

A recent statement put out by GRNSW said that RSPCA NSW had confirmed that there is currently no evidence or investigation to suggest acts of animal cruelty are occurring in the greyhound racing industry in NSW. We would like to take the opportunity to clarify this position. From time to time RSPCA Inspectors will make routine visits to greyhound racing or breeding facilities or are called upon to investigate a specific complaint. In this capacity our Inspectors can only enforce the current animal welfare legislation: they do not have the capacity to act on industry practices that may be within the law but nevertheless result in poor welfare outcomes for racing greyhounds.

Furthermore, the RSPCA Inspectorate relies on the public to formally report suspected animal cruelty in order to investigate. Therefore acts of cruelty to greyhounds such as recent reports of inhumane killing in NSW may be occurring but may not be formally reported to the RSPCA. In other cases reports may be made to the RSPCA Inspectorate however a lack of evidence may prevent the ability to prosecute.

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Thank you again for the opportunity to make our concerns on this issue known to the Inquiry.

Kind regards

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RSPCA Australia Submission

Legislative Council Select Committee on Greyhound Racing in NSW

Inquiry into Greyhound Racing in New South Wales

This submission relates to the following Terms of Reference of the Inquiry:

- (d) The effectiveness of current industry regulation, including the level of autonomy of Greyhound Racing NSW
- (i) The incidence of drug administration and doping in the industry and the efficacy of Greyhound Racing NSW's control and testing processes
- (j) Sale and breeding of greyhounds including the market conditions and welfare of animals
- (k) The welfare of animals in the industry and the role of Greyhound Racing NSW in establishing and enforcing standards of treatment of animals
- (l) Financial incentives for reducing euthanasia and prosecutions for animal mistreatment
- (m) The adequacy and integrity of data collection in the industry, including the number of pups born, the number of dogs euthanased and injury rates, and
- (n) Any other related matter.

1. Overbreeding, wastage, euthanasia and rehoming

One of the key welfare issues for Australian greyhounds is the surplus of dogs produced and the limited capacity for their rehoming¹. Greyhound racing has long been criticised for its breeding methods, which produce thousands more dogs than can be placed at racetracks or in good homes². Thousands of greyhounds are born every year across Australia that are surplus to Industry requirements³. The term 'wastage' is applied to those dogs that are 'lost' from the racing industry including those dogs that never even make it to the track due to injury, lack of racing ability or other reasons⁴.

Australia and New Zealand are the third largest producers of greyhound pups after the USA and Ireland, with 3204 litters whelped in the year ending 30 June 2008. Many of these 21,000 or more pups will not race, with about 35-40% of whelped pups never receiving a registered racing name^{1,3,5}. Only 'Named' greyhounds can race or be used for breeding purposes. It is important to note that the wastage rate of 35-40% represents the immediate wastage rate that applies to those dogs that are never named (never race or breed for the industry). However, ongoing wastage continues over time in the cohort of named racing greyhounds as a result of injury or suboptimal performance.

The racing career for a greyhound is relatively 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, or earlier if they develop injuries or perform suboptimally^{1,4}.

The fate of both non-racing and retired dogs varies and has not been documented. Anecdotally, it is known that dogs not kept for breeding purposes may be referred to the Greyhound Adoption Program (GAP) or other greyhound adoption/rescue groups; given away privately; sold for export; relinquished to welfare organisations or veterinary clinics¹; kept by the original owner, entered into a canine blood donor program⁶ or euthanased.

The industry has stated that many animals are euthanased despite being otherwise healthy⁴. Greyhound Racing NSW (GRNSW) recently stated that they estimate that about 3,000 greyhounds are euthanased each year in NSW alone⁷. Euthanased greyhounds would include both named and unnamed greyhounds. The reasons for euthanasia would vary including being surplus to requirements, injury and suboptimal performance, among other reasons. RSPCA Australia considers that the euthanasia estimate stated by GRNSW may be an underestimate. Other outcomes for greyhounds have included being used for medical research or as teaching animals for University students⁸.

The percentage of greyhounds in each of these categories has not been documented. Therefore the ultimate fate of many greyhounds is simply unknown. Considering the number of greyhounds bred, it is important to question how many greyhounds are actually able to live out their natural life term in comfort. While adoption programs such as GAP are a step forward, adoption programs cannot cope with the high numbers of greyhounds moving through the system. Only a small number of greyhounds are adopted annually in Australia and New Zealand¹.

According to GRNSW, since 2009 only about 300 greyhounds have progressed through the Greyhound Racing NSW greyhound adoption program, Greyhounds As Pets⁹. On average, that would equate to about 75 greyhounds progressed through the GRNSW Adoption program each year. It is important to note that as far as RSPCA Australia is aware, progression through the adoption program is not necessarily the same as adoption through the program as some dogs may not pass the adoption process. Regardless, the number of dogs progressing through the Greyhounds as Pets initiative is a very small proportion of the total number of greyhounds in NSW.

In 2011, 1,276 greyhound litters were registered in NSW³. The total number of greyhounds born is not published, however, by multiplying 1,276 litters by the average number of greyhounds born in each litter (6.3 pups), approximately 8,039 greyhounds were born in NSW in 2011 (note this only includes greyhounds from litters registered with GRNSW). About 35-40% of the 8,039 greyhounds born in 2011 will not receive a registered racing name and therefore will not race or breed for the industry. For 2011, this means that a conservative estimate of 2,810-3,215 greyhounds born in NSW were surplus to industry requirements. Similar numbers of surplus greyhounds would be produced each year in NSW.

On a national level in 2011, 2,887 litters were registered across Australia. This equates to approximately 18,188 greyhounds born in 2011. About 35-40% of the 18,188 greyhounds born in 2011 will not receive a registered racing name. This means that a conservative estimate of 6,370-7,270 greyhounds born nationally in 2011 were surplus to industry requirements. RSPCA Australia considers this wastage rate to be unacceptably high.

Recommendation

Overbreeding, high wastage rates, high euthanasia rates and rehoming problems are inherent in the NSW Greyhound racing industry. Overbreeding leads to thousands of surplus dogs with a concomitant lack of capacity to rehome them. This in turn leads to a high number of unwanted greyhounds and high euthanasia rates.

Immediate action must be undertaken to address these issues including a significant reduction in the number of greyhounds born, improved breeding programs and significantly greater resources to increase rehoming capacity.

2. Injury

Another key welfare issue for greyhounds includes injuries sustained as a direct result of racing and/or training. Injuries to racing greyhounds are common, expensive to treat and contribute to a high wastage rate within the industry¹⁰. Various types of injuries are reported regularly in the veterinary literature and

Australian greyhound racing Steward reports including serious bone fractures and other types of injuries such as hypoxic fits (seizures caused by a lack of oxygen). The literature has recorded injuries to the humerus, femur, radius, ulna, tibia, fibula, carpus, hock, metacarpus, metatarsus, toes, muscles and tendons, among other injuries^{11,12,13,14,15,16}. The literature consistently identifies the pelvic limbs as a common area of injury, particularly the hock (the ankle area).

Injuries are a serious animal welfare problem because they cause pain, suffering and distress and can result in euthanasia. In just a one month period, from 23rd September 2013 to 23rd October 2013 GRNSW Steward's reports confirm approximately 175 injuries to greyhounds¹⁷. Injuries included bone fractures, muscle injuries and soft tissue injuries. Many of the injuries necessitated a suspension from racing. Collisions between dogs were also reported and the first turn of the race track appears to be a common site for accidents to occur. RSPCA Australia considers this to be an unacceptably high rate of injury.

Some of the most serious injuries to greyhounds occurred in NSW at the Dapto meeting on the 10th April 2013 where Stewards reports confirm that a dog named Sniffles suffered a broken back; a dog named Kool Brock suffered a broken neck and a dog named Shez's Way suffered a fractured hock while racing. Each injury occurred around the first turn of the racing track¹⁷.

It is important to note that some of injuries sustained by greyhounds may be treatable however the owner may choose to euthanase for economic reasons.

Recommendation

Injuries suffered by greyhounds compromise animal welfare, occur at a high rate and are often of a very serious nature, with some injuries requiring euthanasia of the affected dog.

Immediate action must be taken to address this issue and significantly reduce injury rates. There must be an immediate review of track design and a database of injuries developed and published. Infrastructure works must be implemented to minimise injury risks including injuries on the first turn of the track and a reduction in collisions between greyhounds.

3. Export of Australian Greyhounds

Australian greyhounds are currently sold and exported overseas for racing purposes. Greyhounds are exported to countries including China, Vietnam and South Korea². In 2010, a total of 797 greyhounds were exported and 280 of those greyhounds went to Macau in China¹⁸.

There are a number of serious animal welfare concerns associated with export.

Transport is inherently stressful for animals and therefore transport should only be undertaken where absolutely necessary. There are injury and stress risks throughout the transport process which increase as the journey length increases.

Animal protection laws may not exist in destination countries (or if laws do exist they may not be adequate or enforced). Currently Australian greyhounds are exported to countries that do not have any animal protection laws and this lack of substantive animal welfare regulations to deter acts of cruelty towards greyhounds is of great concern². There is no guarantee or even reasonable grounds to expect that, Australian greyhounds will be treated humanely once they leave Australia. These concerns are based on the prevailing cultural attitudes towards dogs in some destination countries and reports of cruel treatment to dogs in those countries².

Furthermore, exporting dogs to countries where an active dog meat trade exists presents significant risks to the welfare of greyhounds. There is no guarantee that Australian greyhounds will not enter the dog meat trade.

These aspects of export present significant and unacceptable risks to the welfare of greyhounds. Reportedly greyhounds that are registered with GRNSW are currently exported.

As far as RSPCA Australia is aware, there is no formal tracking system for dogs exported to other countries which means that the ultimate fate of exported Australian greyhounds is unknown². RSPCA Australia also has serious concerns about the apparent lack of formal re-homing/adoption programs in destination countries.

Recommendation

Exporting racing Greyhounds overseas places them at risk of poor animal welfare outcomes including stress and injuries associated with long-distance transport, lack of animal welfare protection in importing countries, and the potential to end up in the dog meat trade.

Immediate action must be taken to prohibit the export of greyhounds for racing or breeding purposes or any other reason other than when a greyhound is accompanying their owner as a companion animal (as a recognised pet) where the greyhound will live as a family pet.

4. Administration of banned substances (doping)

The administration of banned substances to greyhounds currently occurs in NSW. Of the samples tested in the 2012/2013 financial year, there were 35 declared positives¹⁹. Of the samples tested in the 2011/2012 financial year, there were 48 declared positives¹⁹.

Dogs have reportedly tested positive to amphetamines, caffeine, anabolic steroids and Viagra. There have also been reports of cocaine and erythropoietin (EPO) use²⁰.

RSPCA Australia considers the administration of banned substances to be a serious animal welfare issue as reported drug substances can have serious physical and psychological effects on greyhounds thereby compromising their welfare. For example, anabolic steroids have a physiological effect on animals and can cause serious derangements in normal physiological functioning and serious health side effects.

Recommendation

The administration of banned substances to racing greyhounds is systemic in the NSW industry and presents significant health and welfare risks to greyhounds.

The Inquiry should examine ways to effectively prevent the administration of banned substances to safeguard the welfare of greyhounds.

5. Lack of comprehensive published data, transparency and accountability

There is a serious lack of transparency and accountability in the NSW Greyhound racing Industry. There is a lack of data publication regarding the exact number of greyhound pups born each year and the ultimate fate for greyhounds including the number of dogs euthanased.

While there is sufficient evidence that serious overbreeding, wastage and euthanasia problems are currently occurring in NSW, the lack of comprehensive data publication means the full extent of the overbreeding, wastage and euthanasia problems are unknown.

Recommendation

There is a serious lack of published data on the breeding and fate of greyhounds and a subsequent lack of transparency and accountability.

Immediate action must be taken to require compulsory publication of data recording the lifecycle and outcome for greyhounds born in NSW. This would necessitate a formal compulsory tracking system for greyhounds. This comprehensive data must be collected and published (for example, in the GRNSW Annual Report) to enable an accurate assessment of identified problems such as overbreeding and euthanasia and to enable the introduction of effective strategies to significantly reduce these animal welfare problems.

6. Microchipping and registration

The microchipping and registration of greyhounds is very important to permanently identify each individual greyhound. However, greyhounds registered under the NSW Greyhound Racing Rules in NSW are currently exempt from being registered under the *Companion Animals Act*²¹. RSPCA Australia believes all greyhounds including those currently registered with GRNSW must be required to be registered under the *Companion Animals Act* to enable independent registration records for greyhounds.

Furthermore, as far as RSPCA Australia is aware, all microchip information for GRNSW registered greyhounds is controlled and maintained by GRNSW²¹. RSPCA Australia believes that this microchip information must be recorded on the NSW Companion Animals Register to enable independent microchip records for greyhounds.

Recommendation

Registration and microchipping information for each individual greyhound (including greyhounds registered with GRNSW) must be recorded by an independent government authority. This will enable greater transparency and a degree of independent oversight.

Prompt legislative change is needed such that:

- **greyhounds (including those registered with GRNSW) are required to be registered under the *Companion Animals Act*, i.e. registered with their local government (council) authority.**
- **microchip information for greyhounds (including those registered with GRNSW) is required to be recorded on the NSW Companion Animals Register.**

7. Inadequate regulation

GRNSW is currently essentially self-regulated. GRNSW is an independent body responsible for the control and regulation of greyhound racing in NSW⁹. This lack of independent oversight presents significant risks to the welfare of the animals involved in the Industry. RSPCA Australia advocates the comprehensive regulation of greyhound racing (including breeding, rearing, training and competition) to eliminate practices that cause injury, suffering or distress.

Recommendation

The current regulatory arrangements in NSW are insufficient to effectively safeguard the welfare of greyhounds.

Urgent action must be taken to introduce independent external oversight to safeguard the welfare of greyhounds and to enable accountability in greyhound racing

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