

## INQUIRY INTO GREYHOUND RACING IN NSW

**Name:** Name suppressed

**Date received:** 2/11/2013

---

Partially Confidential

## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

I oppose Greyhound Racing because the Australian Greyhound Racing System cannot exist without breeding and disposing of massive numbers of dogs, and because the Economics of the Industry require that Profits be Valued Over and Above the Welfare of the dogs.

Greyhounds bred and kept like livestock is contrary to what is ethically right. It also is contrary to their sentient and pack mentality. Like all other breeds of dogs, they deserve recognition and rights in accordance with humanity, and not enslaved for financial gain. No other breed of dog is forced an existence of a life so dismal.

The Ethos projected by the Racing Industry of the 'Sport' of Greyhound Racing Conflicts with Humane Ethics and Morality.

The Dogs deserve that their story be told to the public, for us to make balanced and ethical decisions regarding the future of Greyhound Racing.

### **(1) The effectiveness of current industry regulation, including the level of autonomy of Greyhound Racing NSW.**

- There is no independent oversight of the greyhound racing industry in NSW. The industry is governed by Greyhound Racing NSW (GRNSW), an autonomous non-government body established in 2009 under the Greyhound Racing Act 2009 (NSW). GRNSW is responsible for both the regulatory and commercial functions of the industry. <sup>1</sup>
- Within GRNSW, there is no independent regulatory body or official, making it difficult or impossible for integrity of the Industry to be monitored. There is an integrity auditor, however this role is appointed by GRNSW itself. This creates a clear conflict of interest as the integrity officer is responsible for overseeing stewards, drug testing, control and registration, advising GRNSW on those matters and investigating complaints against racing officials.<sup>2</sup> Indeed, former greyhound racing integrity auditor for NSW, David Landa, has spoken publicly about his resignation in 2012, criticizing the role as compromised and unworkable.<sup>3</sup> Landa claimed that he was unable to facilitate public inquiries into the problems within the industry, and that "failings in the legislation make the functioning of this position as an independent oversight, simply not possible". No legislative or regulatory change was enacted following Mr Landa's resignation. <sup>4</sup>
- There is no government body in NSW which takes responsibility for the welfare of greyhounds. The Minister for Agriculture and the Department of Primary Industries administer the *Prevention of Cruelty to Animals Act 1979 (NSW)*, but have little or no involvement with GRNSW except to investigate cruelty complaints, if any are made (see

---

<sup>1</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>.

<sup>2</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>.

<sup>3</sup> Kevin Pitstock, *NSW Inquiry In To Greyhound Racing - New Dawn or Death Knell?*, [www.australianracinggreyhound.com](http://www.australianracinggreyhound.com)

<sup>4</sup> 'NSW racing going to the dogs' Sun Herald, 15 July 2012.

## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

discussion below). The Minister for Racing is responsible for racing but not the welfare of racing greyhounds. These government departments do not know how many greyhounds are bred, killed or die on the track each year.

- GRNSW operates under the *Greyhound Racing Act 2009 (NSW)*. Neither this Act nor any other statutory or regulatory instrument requires GRNSW to report welfare issues or cruelty cases, to the RSPCA, the Government, The Media or to the Public in any way. There are significant welfare issues for Greyhounds that result from a commercial racing and gaming industry that is not independently regulated. The insularity of the racing industry from Public scrutiny means that the majority of welfare issues are not transparent to the Public, nor are these issues reported to the media or recorded in any reports, industry or otherwise (that are transparently available).<sup>5</sup>

### **(2) The incidence of drug administration and doping in the industry and the efficacy of Greyhound Racing NSW's control and testing processes.**

- The link in the Greyhound racing industry to criminal activity has been brought up in the many inquiries into the industry. In 2000, when the industry was still under government regulation, an inquiry into the sport by the Independent Commission Against Corruption led to six people being charged with corrupt practices and the jailing of the former chief steward Rodney Potter. Now that the industry is self-regulating, it is out of the reach of ICAC.<sup>6</sup>
- This link to criminal activity appears to be a continuing issue. Former integrity auditor David Landa expressed concern that GRNSW had not conducted any public inquiry into criminal or motorcycle club involvement in the industry.<sup>7</sup>
- The Greyhound racing industry has been plagued by allegations of doping, with reports of links to outlaw motorcycle club involvement.<sup>8</sup> From 2010/11 to 2011/12, across the country, positive drug swabs rose 82 per cent.<sup>9</sup>
- Recently reported incidents confirm that this is a continuing issue:

1. Greyhound trainer, Darryn Melvaine, was disqualified for 12 months due to a greyhound having a positive swab for amphetamine.<sup>10</sup>

---

<sup>5</sup> Letter to the Editor, *Animal Welfare Issues in the Greyhound Industry* (2013) 9 AAPLI 1 at 108.

<sup>6</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>

<sup>7</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>

<sup>8</sup> 'Going to the dogs - bikes, dopers and fraudsters', Sun Herald, 12 August 2012.

<sup>9</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>

<sup>10</sup> GRNSW, *Melvaine Disqualified*, <http://www.thedogs.com.au/NewsArticle.aspx?Newsid=4313>

## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

2. Greyhound trainer Mark Azzopardi was stood down in June 2013 over a positive test to cocaine by a dog in his kennel, Transcend Time.<sup>11</sup>

3. Greyhound trainer John Smart, received a suspension of two months over positive test to the prohibited substances - Caffeine, Theophylline, Paraxthine and Theobromine by two of his dogs.<sup>12</sup>

4. Wendy Connell was found guilty after an inquiry into a positive swab from a greyhound to Procaine and was fined \$500.<sup>13</sup>

5. Andrew Nguyen was fined \$500 and suspended for two years after an inquiry into a positive swab from a greyhound to Procaine.<sup>14</sup>

6. In March 2013, trainer Leo Vanderburg was disqualified for a period of nine months and was fined \$3,000 after a urine sample taken from Vanderburg's greyhound tested positive to amphetamine and benzoylecgonine.<sup>15</sup>

### **(3) Sale and Breeding of Greyhounds, including the Market Conditions and Welfare of Animals.**

#### **(1) Overbreeding of Greyhounds and the HIGH Euthanasia Rate**

- In NSW in 2012, there were 4000 registered greyhound trainers and 8200 registered greyhound owners. In NSW, on average for the last 5 years, 8900 greyhounds were born each year.<sup>16</sup>

---

<sup>11</sup> Chris Roots, *Trainer suspended over dog's positive cocaine test*, 15 June 2013, The Age, <http://www.theage.com.au/sport/horseracing/trainer-suspended-over-the-dogs-positive-cocaine-test-20130614-2o9ph.html#ixzz2WNYcnJEd>

<sup>12</sup> Michael East, *New South Wales Greyhound Trainer Suspended For Two Months For Feeding Green Tea*, 24th April 2012, <http://www.australianracinggreyhound.com/australian-greyhound-racing/new-south-wales-greyhound-racing/new-south-wales-greyhound-trainer-suspended-for-two-months-for-feeding-green-tea/33612>

<sup>13</sup> Kevin Pitstock, *Fine Only For Greyhound Trainer Of Positive Swab To Procaine*, 17 December 2008, <http://www.australianracinggreyhound.com/australian-greyhound-racing/victorian-greyhound-racing/fine-only-for-greyhound-trainer-of-positive-swab-to-procaine/7194#ixzz2hUJdWEBE>

<sup>14</sup> Kevin Pitstock, *Suspended Fine For Procaine Swab Greyhound*, 16 January 2009, <http://www.australianracinggreyhound.com/australian-greyhound-racing/victorian-greyhound-racing/suspended-fine-for-procaine-positive-swab-greyhound-trainer/8084#ixzz2hUJvtn2w>

<sup>15</sup> GRNSW, *Leo Vanderburg Fined And Disqualified*, 22 March 2013, <http://www.thedogs.com.au/NewsArticle.aspx?NewsId=3673>

<sup>16</sup> James Cockington, *This is no slumdog*, SMH 20 June 2012

## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

- Greyhounds, if they remain uninjured or do not perish, generally have a two year racing career<sup>17</sup>, beginning at around 14 months and ending at around 4 years of age. After this time, there are enormous numbers of greyhounds that are no longer wanted by their owners or trainers. They may be injured, deemed too slow to race, do not want to chase the lure, or are not desired for breeding purposes. According to figures provided by GRNSW, over 3,000 greyhounds are put down in NSW alone each year because they are "too slow", have been injured racing or training, or have reached the end of their racing career.<sup>18</sup>
- This is likely to be a conservative estimate of the TRUE number of greyhounds killed each year. From 2003 to 2011, there were 80,133 greyhounds born in NSW.<sup>19</sup> In 2012, there were 2,552 greyhounds registered as pets and 6150 greyhounds registered as racing greyhounds. Greyhounds live 10 to 12 years, so in 2012 - there should be more than 80,133 greyhounds alive. Thus, it seems that 71,431 greyhounds are unaccounted for.<sup>20</sup>
- It is unclear whether GRNSW is failing to collect data on the fate of greyhounds or they are not making it publically available. Either scenario is UNACCEPTABLE in accounting for the welfare of dogs in the greyhound racing industry.<sup>21</sup>
- Rehoming of Greyhounds discarded from the racing industry provides an alternative to the premature euthanasia of otherwise healthy dogs. Some greyhounds are re-homed through the industry run program "Greyhounds as Pets", or through independent greyhound rescue groups. GRNSW does NOT publically disclose the number of greyhounds adopted through the 'Greyhounds as Pets' program, however it has been revealed that just 300 dogs have been re-homed since 2009 under this program.<sup>22</sup> This is a VERY SMALL PERCENTAGE of the greyhounds born in NSW.

---

<sup>17</sup> James Cockington, *This is no slumdog*, SMH 20 June 2012

<sup>18</sup> 'Greyhound racing euthanasia rates slammed', 10 November 2012, ABC News.

<sup>19</sup> This figure does NOT include puppies discarded from unplanned litters. Answers to questions on notice lodged by MP for Sydney, Alex Greenwich 23 May 2013. Full text of questions and answers available at <http://www.parliament.nsw.gov.au/prod/la/gala.nsf/18101dc36b638302ca257146007e4e1a/73129441ba2b6f30ca257b750000790d?>

<sup>20</sup> Greyhound Freedom, <<https://www.facebook.com/pages/Greyhound-Freedom/341841249187362?fref=tsp>>

<sup>21</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>

<sup>22</sup> Answers to questions on notice lodged by MP for Sydney, Alex Greenwich 23 May 2013. John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>

## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

Thus, the MAJORITY of greyhounds born in NSW are disposed of or die at a young age, and their fate is largely unknown.

### (2) Unlicensed Puppies

- Under the GRNSW Greyhound Racing Rules, breeding of greyhounds is strictly regulated. Under Rule 126 of GRNSW Greyhound Racing Rules, "Where the owner of a greyhound consents to another person using the greyhound for breeding purposes.... A prescribed authority form shall be lodged with the Controlling Body..." Rules 126-140 relate to the rules controlling siring, whelping and breeding more generally.
- The strict regulation of the breeding of greyhounds results in unlicensed puppies born accidentally, or in an unregistered situation, being destroyed. This outcome was brought to Public attention in the well reported incident involving greyhound trainer Tony Lockett, who was sued when he sold unlicensed greyhound puppies.<sup>23</sup> After the tests confirmed that the nearly 40 greyhound puppies were not sired correctly, the authorities removed their breeding certificates, stamping them "sire unknown", and the puppies were destroyed. Re-homing and Rescue Groups rarely have greyhound puppies surrendered into their care.
- Therefore, there are THOUSANDS of Greyhounds which are born and die every year in Australia, that DO NOT get re-homed. It is not known whether any data is collated on the number of puppies born, or the number of greyhounds killed in the NSW greyhound racing industry each year. This data remains hidden from the Public.<sup>24</sup> It is not until dogs have reached 12 weeks of age that they are required to be implanted with a microchip, or at point of sale or change of ownership ( whichever occurs first ). This is the first time an external record of their existence is required to be kept.
- Tracking of Greyhounds from Birth to Death largely relies on Breeders and Owners 'Self-Reporting' to Greyhound Racing NSW.<sup>25</sup> There needs to be MORE TRANSPARENCY in the LIFECYCLE of these dogs.

### **(4) The Welfare of Animals in the Industry and the Role of Greyhound Racing NSW in Establishing and Enforcing Standards of Treatment of Animals.**

- Regulation of Animal Welfare in the Racing Industry comes under the Primary Responsibility of Greyhound Industry Bodies. In NSW, this is Greyhound Racing NSW. According to the Animal Welfare Policy of GRNSW, it " has primary responsibility for the control of greyhound and animal welfare in the NSW greyhound racing industry through

---

<sup>23</sup> Mark Forbes, *Lockett Sued Over Alleged Greyhound Scam*, The Age September 17, 1998, <http://www.greyhoundbreeding.com.au/greyhound-breeding-articles/1998/9/17/lockett-sued-over-alleged-greyhound-scam/>

<sup>24</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>

<sup>25</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>



## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

the implementation of reverent policies, rules and regulations as well as information and education programs. In addition, GRNSW insists that clubs adhere to animal and greyhound welfare policies and regulations as a condition of their registration.”<sup>26</sup>

- Whilst the Animal Welfare Policy of GRNSW provides that those involved in greyhound racing “ Must take appropriate action where... Cruelty or Neglect is identified, including reporting of offending parties to the RSPCA or other relevant authorities that are in a position to take action against an offender “, the RSPCA does NOT generally intervene in the welfare of Greyhounds whilst in the Racing Industry. Dr Hugh Wirth was quoted in 2004 as stating that whilst he deplored the overproduction of greyhounds for the racing industry, the Official RSPCA position is that there is no reason to ban greyhound racing. The RSPCA gains its authority from the *Prevention of Cruelty to Animals Act 1979* (NSW), which does little to protect the welfare of greyhounds in the racing industry. The racing of Greyhounds is itself not an offense under the Act, and the killing of an animal is also not unlawful per se.... As long as the pain and suffering inflicted on the animal during the act of killing does not amount to cruelty, it is lawful for an owner to dispose of their property.<sup>27</sup> Furthermore, there is no act of cruelty involved in greyhounds dying as a result of injuries sustained during a race. As long as the racing is legitimate and the pain and suffering inflicted on the animal during the act of killing, does not amount to cruelty, there is no offense in the disposal or death of injured, slow or otherwise unwanted greyhounds. CAN YOU HUMANELY BELIEVE THAT!!!!!!
- Any cruelty or mistreatment of greyhounds would have to be reported to the RSPCA in order for any investigation to be instigated.
- In reality, this leaves the welfare of greyhounds in the hands of the Stewards who manage the operations of race meets. The role of the steward is to administer the racing rules, which involves the steward acting as Investigator - Prosecutor and Adjudicator of Breaches to the racing rules. This multifaceted role was highlighted as problematic by Malcolm Scott in his 2008 Report<sup>28</sup> into the racing industry, as this leaves little room for the separation of power needed to allow for due process to occur.
- Malcolm Scott in his 2008 Report highlighted that “ the traditional role of stewards is that of acting as Investigator, Prosecutor and Adjudicator. There is no discernable break or differentiation between stewards engaging in all three functions. Leaving aside matters of Law and issues of Natural Justice, there is a Lingering Perception that it is Inappropriate for the Same Person to Gather Evidence, Bring about a Charge based upon that Evidence, Prosecute that Evidence and Determine the Charge based upon that Prosecution.”<sup>29</sup>

---

<sup>26</sup> <http://www.thedogs.com.au/DPage.aspx?spid=116&id=3>

<sup>27</sup> Letter to the *Editor, Animal Welfare issues in the Greyhound Industry* (2013) 9AAPLJ at 108.

<sup>28</sup> Malcolm Scott, *2008 Independent Review of the Regulatory Oversight of the NSW Industry Report* (June 2008)

<sup>29</sup> Malcolm Scott, *2008 Independent Review of the Regulatory Oversight of the NSW Industry Report* (June 2008), p 15.

## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

- Where there is any mention in the Racing Rules to Welfare Issues, these rules are more related to ensuring fairness of the Punters, than the Genuine Welfare of the dogs. For example, examination of competing greyhounds prior to racing by a registered veterinarian under Rule 37, relates to determining the fitness of the dog for racing. If the dog is not fit to race, the steward can order its withdrawal from the race. Under the racing rules, stewards have very limited power to intervene where welfare concerns potentially arise. Failure to provide adequate welfare of greyhounds is an offence under Rule 106, and is punishable at the discretion of the steward by a fine and most extremely by expulsion from the racing industry (Rule 95). There is no provision for the seizure of greyhounds where any welfare concerns are raised.<sup>30</sup>
- Furthermore, under Rule 73 of GRNSW Greyhound Racing Rules, “where a greyhound is injured during an Event, the veterinary surgeon or authorized person, or in their absence - the Stewards may impose a period of incapacitation commencing on the day on which the greyhound is injured. (2) Subject to Rule 73(3), an owner of trainer shall not permit the greyhound to compete in an Event or satisfactory trial during the period of incapacitation. (3) Where a greyhound is prohibited pursuant to Rules 37(2) and 73(1) from competing in any Event, the trainer may, subsequent to the day that an order is made, make only 1 application to the Stewards for the greyhound to be examined by an officiating veterinary surgeon or authorized person, to determine whether at the time of the examination the greyhound is free of injury and if the greyhound is found not to be suffering an injury, the restriction imposed shall be revoked.” Thus the focus of this Rule is on suspending the dog from racing - rather than ensuring the Welfare of the dog is met. Can you believe that!!...
- Offences are outlined in Rule 86 of GRNSW Greyhound Racing Rules. There is no provision in relation to the Welfare of Greyhounds. The only mention of an offence in relation to welfare, makes it an offence to engage in conduct which is detrimental or prejudicial to the welfare of greyhound racing ((q)). Rule 86 (ac) makes it an offence to engage in “neglect or of any dishonest, corrupt or improper act or practice in connection with the Breeding or Registration of Greyhounds or has attempted any such act or practice.” [emphasis added]
- Under Rule 106 of GRNSW Greyhound Racing Rules:
  - (1) A registered person must ensure that greyhounds, which are in the person's care or custody, are provided at all times with -
    - (a) proper and sufficient food, drink and protective apparel;
    - (b) proper exercise;
    - (c) kennels constructed and of a standard approved by the Controlling Body which are adequate in size and which are kept in a clean and sanitary condition; and
    - (d) Veterinary attention when necessary.

---

<sup>30</sup> Letter to the Editor, *Animal Welfare Issues in the Greyhound Industry* (2013) 9 AAPLJ 1 at 108.



## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

(2) A registered person must exercise such reasonable care and supervision as may be necessary to prevent greyhounds pursuant to the person's care or custody from being subjected to Unnecessary Pain or Suffering. [emphasis added]

However, this Rule is not linked to any offence for breach thereof so seems merely aspirational and ultimately ineffective.

- The absence of internal regulation by GRNSW of the Welfare of Greyhounds, needs to be Addressed and an Independent Animal Welfare Steward Should be Appointed.
- Ultimately, it is at the owner's discretion as to what to do with the dog. As a Chattel, it is lawful for an owner to dispose of their property. Under Rule 105, the owner is required to notify Greyhound Racing NSW of any change in circumstances of a licensed greyhound, that is if the greyhound has been retired as a pet, made a breeding greyhound, surrendered to a Rescue Organization, Exported, Humanely Euthanized by a veterinarian, or is Deceased. Although Rule 106 requires that if a greyhound has been euthanized by a veterinarian, the owner must include a veterinary certificate of euthanasia to Greyhound Racing NSW, this does not go so far as to require humane euthanasia.

### **(5) Financial Incentives for Reducing Euthanasia and Prosecutions for Animal Mistreatment.**

- The RSPCA is one of the bodies given authority under the *Prevention of Cruelty to Animals Act 1979* (NSW) to prosecute for cruelty, neglect, harm or mistreatment of animals in NSW, which presumable includes Greyhounds.
- As stated above, the RSPCA does NOT generally intervene in the welfare of greyhounds whilst in the racing industry. Dr Hugh Wirth was quoted in 2004 as stating that whilst he deplored the overproduction of greyhounds for the racing industry, the official RSPCA position that there is no reason to ban greyhound racing.
- The RSPCA gains its authority from the *Prevention of Cruelty to Animals Act 1979* (NSW), which does little to protect the welfare of greyhounds in the racing industry. The racing of greyhounds is itself not an offence under the Act, and the killing of an animal is also not unlawful per se. As long as the pain and suffering inflicted on the animal during the act of killing does not amount to cruelty, it is lawful for an owner to dispose of their property.<sup>31</sup> Furthermore, there is no act of cruelty involved in greyhounds dying as a result of injuries sustained during a race. As long as the racing is legitimate and the pain and suffering inflicted on the animal during the act of killing does not amount to cruelty, there is no offence in the disposal or death of injured, slow, does not want to chase the lure, or otherwise unwanted greyhounds.
- Furthermore, in order for the RSPCA to commence an investigation into cruelty, neglect, harm or mistreatment of a greyhound, a complaint would need to be made. The

---

<sup>31</sup> Letter to the Editor, *Animal Welfare Issues in the Greyhound Industry* (2013) 9AAPLJ 1 at 108.

## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

tight security surrounding race meetings, mean that RSPCA Inspectors would NOT ordinarily have access to the racing dogs. Under Rule 28 of GRNSW Greyhound Racing Rules, "a person shall not enter the kennel area at a meeting without the permission of the Stewards." Also Video or Audio evidence is difficult to obtain since under Rule 44 of GRNSW Greyhound Racing Rules "...an owner, trainer or attendant shall not use in any way, or have turned on, a mobile telephone, mobile communication device or any unauthorized device whilst parading, handling or acting as a catcher of a greyhound or whilst participating in a presentation ceremony or while present in the kennel building or parade area."

### **(6) The Adequacy and Integrity of Data Collection in the Industry, including the number of Puppies Born, the Number of Dogs Euthanized and the Injury Rates.**

- It is NOT known whether any data is collated on the number of Greyhound Puppies born, the number of racing dogs injured, or the number of dogs killed in the greyhound racing industry each year. This Data Remains Hidden from the Public.<sup>32</sup>
- The fate of racing dogs is also Misreported on Racing Databases in some States, including NSW. For example, on 12 August 2013 the greyhound 'Lend Us Five' died from a cardiac arrest after race 2 at Albion Park.<sup>33</sup> The Greyhound Racing Victoria website says that 'Lend Us Five' is retired. <sup>34</sup> This makes it exceedingly difficult to effectively gather the Correct Data on the Lifecycle of racing dogs.
- It is Not until dogs have reached 12 weeks of age that they are required to be implanted with a microchip, or at point of sale or change of ownership (whichever occurs first). This is the first time an external record of their existence is required to be kept.
- Tracking of greyhounds from Birth to Death largely relies on Breeders and Owners Self-reporting to Greyhound Racing NSW. <sup>35</sup> There Needs to be More Transparency in the Lifecycle of these dogs.
- There is NO record of the Fate of the Thousands of Greyhounds 'retired' from their racing careers after the age of 4. There is NO record of the Number of Greyhounds given to Universities for Teaching and Training, or Kept by Veterinary Hospitals as LIVE Blood Donors, or Sent to Overseas Racing Industries such as Macau in China.

---

<sup>32</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>

<sup>33</sup> Brisbane Greyhound Racing Club Inc Stewards Report, 12 August 2013, <http://www.greyhoundsqueensland.com.au/archived/stwdreports/brisbane/BRISBANE-Monday-12Aug2013-Stewart.htm>.

<sup>34</sup> Greyhound Racing Victoria, *Lend Us Five*, <<https://fasttrack.grv.org.au/Dog/Details/-710763>>

<sup>35</sup> John Kaye, 8 October 2013, *Have your say on greyhound racing in NSW*, <<http://johnkaye.org.au/have-your-say-on-greyhound-racing-in-nsw/>>

## Submission for 'Enquiry Into Greyhound Racing In New South Wales'

- The Nature of the 'sport' is Dangerous to Greyhounds, with instances of Death from Broken Necks and Backs, and Broken Legs, along with Head Trauma or Cardiac Arrest. The Greyhound Advocacy Group, *Greyhound Freedom* has determined that in 2012 - 510 greyhounds fractured a bone or died from their injuries at a TAB Greyhound Track in Australia. There were 1583 further injuries and 3386 greyhounds were scratched from scheduled races due to injuries. In 2013, from January to September - a total of 849 greyhounds died or were killed as a result of their injuries or broken bones from racing, and there were 12,084 other injuries from racing. Injuries and Deaths which occurred at the 20 non-TAB Greyhound Tracks in NSW are Unable to be Determined, as the Stewards' Reports are NOT accessible to the Public.
- The Adequacy and Integrity of Data collected (or Not collected) by the Greyhound Racing Industry, supposedly tracking dogs from Birth to Death, is called into Question...