

Submission  
No 26

## INQUIRY INTO GREYHOUND WELFARE AND INTEGRITY COMMISSION

**Organisation:** Anti Greyhound Racing Network NSW (AGRN NSW)

**Date Received:** 2 December 2020

---

**Inquiry into the Greyhound Welfare Integrity Commission**

**Submission prepared by the Anti Greyhound Racing Network NSW  
(AGRN NSW)**



**December 2020**



**Anti Greyhound Racing Network NSW (AGRN NSW)**

The AGRN NSW is collaboration of animal advocates in NSW seeking to bring an end to greyhound racing.

The AGRN welcomes the opportunity to provide comment on the Greyhound Welfare Integrity Commission (GWIC) Inquiry. We emphasise that the following submission must not be interpreted as support for the greyhound racing industry. In our informed view, the commercial motivations of the greyhound racing industry result in numerous unacceptable practices and significant welfare breaches which will inevitably continue irrespective of improved standards and an increased level of oversight or enforcement. It is the position of the AGRN NSW that the only way to protect greyhounds from an industry which overbreeds and exploits them through racing and gambling for prizemoney is to bring an end to greyhound racing in Australia. We acknowledge that the current inquiry does not include consideration of a greyhound racing ban.

The following submission is structured in light of the points listed on the Terms of Reference provided by the Select Committee On The Greyhound Welfare And Integrity Commission.

***(a) The policies, procedures, mechanisms, and overarching principles of the Commission in relation to industry participants;***

The AGRN NSW is concerned about the Greyhound Rehoming Policy, which does not adequately protect healthy greyhounds discarded from the racing industry from being euthanised rather than rehomed.

We recognise that recommendations 80 and 83 of the Greyhound Industry Reform Panel were accepted by the NSW Government, however we submit that the rehoming policy has too many loopholes that allow the NSW racing industry to overbreed and then discard unwanted dogs.

The rehoming policy states that an owner of a greyhound not required for racing or breeding has the following options:

1. keep the greyhound themselves,
2. rehome the greyhound to another person,
3. rehome the greyhound through GAP or a private rehoming organisation,
4. place the greyhound with an animal welfare organisation (RSPCA or AWL) or local government pound, or
5. euthanise the greyhound.

Thus, the rehoming policy permits the euthanasia of healthy greyhounds. The GWIC is legally entitled to track only those greyhounds who have been retained by an owner or trainer (as per subparagraph 1 above). Greyhounds rehomed privately by an owner or trainer to another person can then be euthanised without any requirement to notify the GWIC. Similarly, greyhounds that end up at a Council pounds can be euthanised if they are not adopted when the holding time expires.

The Coalition for the Protection of Greyhounds has analysed the fate of NSW greyhounds discarded by the racing industry over the last three financial years and found that thousands of greyhounds cannot be accounted for. At the very least, the fate of every greyhound in the racing industry must be placed on public record, including every greyhound's racing name, microchip number, ear tattoo number and whereabouts.

The AGRN's position is that it is unlikely that there is a home for every greyhound discarded or retired from the racing industry. It is our position that the focus of the GWIC and welfare policies in general should be on reducing the number of greyhounds that are permitted to be bred for the racing industry.

***(b) the appropriateness of disciplinary action for those industry participants breaching legal requirements as set out by the Commission.***

Our main concern is that penalties awarded by the GWIC are not serious enough to deter participants from breaching legal requirements as set out by the GWIC. In the past six months alone, thirty-two participants were charged with either possessing prohibited substances or prohibited substances were detected in their greyhound(s).<sup>1</sup> Of these thirty-two participants, twenty-five were only suspended for an average number of fourteen weeks and only seven of these participants received an average financial penalty of \$1,179. The message being sent to participants by these 'slap on the wrist' penalties is that breaches lead to a brief interruption before it is business as usual.

---

<sup>1</sup> Greyhound Welfare & Integrity Commission, 'Integrity/Final Disciplinary Action Decisions', viewed on 29 November 2020, <<https://www.gwic.nsw.gov.au/integrity/disciplinary-decisions>>.

It is our view that penalties for doping, cruelty and other animal offences should be higher in order to align with community's concerns for the welfare of greyhounds in the racing industry.

***(c) The options for appeal by industry participants who breach legal requirements as set out by the Commission***

No comment

***(d) The combined relationship of the Commission, the industry operator Greyhound Racing NSW, and industry participants in relation to the overall greyhound racing industry.***

The separation of commercial and regulatory functions of the greyhound racing industry is essential to minimise the potential for conflicts of interest, as highlighted by both the Special Commission of Inquiry into the Greyhound Racing Industry in NSW and the Greyhound Industry Reform Panel.

The GWIC is the industry regulator responsible for ensuring that GRNSW and industry participants comply with the legislation, regulations, policies and procedures governing the greyhound racing industry. Separation of the industry from the regulatory is imperative in order for the GWIC to be able to independently regulate industry with policies and procedures, and to ensure the welfare of greyhounds is independently and properly assessed.

***(e) The existing funding agreement between the Commission and Greyhound Racing NSW with a view to considering recommended options.***

Under the *Greyhound Racing Act 2017* (NSW) ("the Act"), GRNSW is responsible for funding the costs of the GWIC, however the NSW Government was called upon to give additional funds over a 4 year period to help establish the GWIC and fund its initial operations.

It is our view that in order for the regulatory and commercial arms of the industry to be truly separate, the NSW Government should fund the GWIC entirely. The funds should continue to be recouped via Point of Consumption taxes on the gambling industry which is legislated in the *Betting Tax Act 2001*. It is our view that it is not appropriate for a commercial entity to provide funds directly to a government entity, especially if the role of the government entity is to regulate the activities of the commercial entity. This is a conflict of interest.

***(f) The actions, conduct and effectiveness of the Commission and GRNSW, in particular in relation to its role in improving the welfare of greyhounds.***

Under section 11 of the Act, one of the principle objectives of the GWIC is to promote and protect the welfare of greyhounds. In our view, the objective of protecting the welfare of greyhounds can and will often come into conflict with the other objectives. This conflict was highlighted by the Special Commission of Inquiry into the Greyhound Racing Industry in NSW. In our view, the welfare of greyhounds can never truly be protected in an industry that is inherently harmful.

In our view, the primary objective of the GWIC should be to promote and protect the welfare of greyhounds.

Functions of the GWIC

It is our view that the Act places constraints on GWIC's ability to meet the above objective.

In addition to the functions set out in section 12 of the Act, we would like to see the following functions allocated to GWIC:

- i. to set minimum standards for racecourse design and construction and greyhound training facilities.

These functions currently fall under the jurisdiction of GRNSW under section 26(1)(a) and (c) of the Act. In our view, the design of racecourses and training facilities is a welfare issue, and thus should fall under the jurisdiction of the GWIC. In NSW this year from January to July, there were 1567 track injuries, 290 of which were major injuries, and 29 deaths.<sup>2</sup>

- ii. to track and inspect, at least once per year, every greyhound owned by a registered industry participant and every greyhound rehomed privately by a registered industry participant.

In light of the GWIC's objective of ensuring the welfare of greyhounds, it is necessary for the GWIC to ensure welfare standards are maintained throughout the life of greyhounds born into the racing industry. According to the GWIC's records, during the first quarter of 2020, 299 greyhounds retired and 172 of these were reported as being kept by the trainer or rehomed privately by the trainer.<sup>3</sup> Increased inspection will also enable the GWIC to ensure the accuracy of the greyhound register.

It is our view that in order to fulfil this function effectively, the number of inspectors employed by the GWIC must be increased from eight. There are approximately 13,000 greyhounds currently registered with the GWIC in NSW and 26,852 greyhounds in the registered population, thus it is impossible for a small number of inspectors to be able to check every greyhound in the industry to ensure welfare standards are met. We propose that the number of inspectors must be substantially increased.

- iii. to set maximum breeding targets for greyhounds in NSW.

One of GWIC's functions under the Act is "to undertake research and investigation into any aspect of the breeding of greyhounds and of greyhound racing generally". We would like to see this function expanded to include setting maximum breeding targets for greyhounds in NSW. Breeding targets should not be set by the commercial arm of the industry, but rather by the regulatory arm with appropriate veterinary, welfare and social considerations factored into the decision making process (in consultation with the Welfare Committee).

- iv. to set the behavioural assessment standards used by Greyhounds as Pets NSW (GAP) to assess a greyhound's suitability to be re-homed in a private home.

The greyhound re-homing policy requires owners to submit a greyhound no longer required by the owner to Greyhounds as Pets NSW (GAP). This policy allows an owner to euthanise a greyhound if it is rejected by GAP and cannot be taken by a private re-homer. We would like to see the GWIC set the behavioural assessment standards used by Greyhounds as Pets NSW (GAP) to assess a greyhound's suitability for admission, since the consequence of a second GAP rejection often leads to the euthanasia of the greyhound. Greens Senator Mehreen Faruqi found out via a freedom of information request that out of the 671 dogs that were tested for the GAP program in 2017-2018, 257 dogs failed the test, which is a failure rate of 38 per cent.<sup>4</sup>

---

<sup>2</sup> Coalition for the Protection of Greyhounds, "2020 track deaths and injuries", accessed on 24 August 2020, <<http://greyhoundcoalition.com/2020-track-deaths-and-injuries/>>.

<sup>3</sup> GWIC 2020, "Greyhound Retirement and End of Life Report (1 January – 31 March 2020)", accessed on 24 August 2020, <[https://www.gwic.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0003/296391/Retirement-and-End-of-Life-Report\\_Jan-Mar\\_2020.pdf](https://www.gwic.nsw.gov.au/__data/assets/pdf_file/0003/296391/Retirement-and-End-of-Life-Report_Jan-Mar_2020.pdf)>.

<sup>4</sup> Eddie, R 2018, "Third of retired greyhounds could be put down for failing rehoming test", *The New Daily 20 September 2018*, accessed on 24 August 2020, <<https://thenewdaily.com.au/news/state/nsw/2018/09/20/greyhound-racing-nsw-rehoming/>>.

It is our view that rejection by GAP places a large burden on charitable rehoming groups to foster, rehabilitate and rehome greyhounds that would otherwise be euthanised. According to the GWIC's report, private rehoming organisations rehome the majority of retired greyhounds, thus they continue to bear the majority of the economic and social burden associated with rehabilitating, fostering and rehoming retired greyhounds, and rely often entirely on public donations to do so.<sup>5</sup> It is our view that GAP NSW should be the primary avenue for the retirement of greyhounds from the industry in NSW, and appropriate funding and standards should exist to facilitate this.

It is neither just nor equitable that animal welfare organisations, funded often entirely by public donations, should bear the cost of inspecting dogs and prosecuting cases of cruelty to dogs which have been bred for purely commercial purposes by the greyhound racing industry. In our view, the burden and cost associated with inspecting greyhounds and investigating and prosecuting animal welfare offences should be borne by the NSW government.

---

<sup>5</sup> GWIC 2020, "Greyhound Retirement and End of Life Report (1 January – 31 March 2020)", accessed on 24 August 2020, <[https://www.gwic.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0003/296391/Retirement-and-End-of-Life-Report\\_Jan-Mar\\_2020.pdf](https://www.gwic.nsw.gov.au/__data/assets/pdf_file/0003/296391/Retirement-and-End-of-Life-Report_Jan-Mar_2020.pdf)>.