

**Submission
No 27**

INQUIRY INTO GREYHOUND WELFARE AND INTEGRITY COMMISSION

Organisation: Tabcorp Holdings Limited

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CONFIDENTIAL AND COMMERCIALY SENSITIVE

The Director
Select Committee on the Greyhound Welfare and Integrity Commission
Parliament House, Macquarie Street
Sydney NSW 2000

Via email: GWIC@parliament.nsw.gov.au

Inquiry into the Greyhound Welfare and Integrity Commission

Dear Committee Members,

Tabcorp Holdings Limited (Tabcorp) appreciates the opportunity to make a submission to the Inquiry into the Greyhound Welfare and Integrity Commission.

Tabcorp supports a well-regulated greyhound racing industry where animal welfare is a priority. Tabcorp is committed to animal welfare and building a sustainable future for the industry and our business. We expect the highest standards of animal welfare and integrity, and we want to ensure that we continue to work in partnership with the greyhound racing industry in each state and territory to ensure that the welfare of animals continues to be prioritised.

About Tabcorp

Tabcorp is the sole wagering and lottery licensee in NSW, and through its subsidiary brands (e.g. NSW Lotteries, TAB, Sky Racing, Keno, MAX Gaming) makes an economic contribution in NSW of \$1.6 billion per year – this includes \$773 million in state taxes, \$380 million in support to the racing industry and \$323 million in commissions to local small and family-owned businesses. Tabcorp's products support 160,000 jobs across NSW and Tabcorp employs 1,800 in NSW alone.

Tabcorp's contribution to Greyhound Racing NSW (GRNSW)

Last financial year, Tabcorp provided over \$1 billion of funding to the racing industry (\$380 million in NSW), including \$51 million to Greyhound Racing NSW (GRNSW), making us the largest commercial partner of the industry. Collectively these funds contribute towards racing bodies operating their businesses, including maintaining and improving facilities, integrity and animal welfare, providing prize money to participants and promoting their sport.

The wagering environment and funding to the racing industry

COVID-19 has presented significant challenges for the racing and wagering industry. The forced shutdown of Tabcorp's retail venues in response to COVID-19 has accelerated structural trends away from retail wagering with TABs, which provide around 70% of funding to the Australian racing industry.

Wagering regulations in Australian states and territories have not kept up with these structural trends, which advantages overseas-owned online only gambling companies at the expense of local TABs and the racing industry.

For example, Tabcorp's wagering business reported a 34% decrease in profit in the six months to 30 June 2020. In sharp contrast, overseas-owned online gambling companies have reported extraordinary increases in revenues and profits – the parent company of Sportsbet (Flutter Entertainment Plc) announced a profit increase for its Australian business of 108% in the same six month period, and Ladbrokes also reported increases in revenues (e.g. up 76% during the COVID-19 retail shut down).

This raises concern about whether overseas-owned online gambling companies are paying their fair share – and whether they should be paying more to support the sustainability of the industry, including animal welfare initiatives. Noting that there is precedent in NSW for a charge to be levied for the use of overseas-owned disrupters (e.g. Uber and the local taxi industry) – although this is better to be levied on the profits of overseas-owned disrupters rather than the customer.

Tabcorp's Commitment to animal welfare

Tabcorp supports a well-regulated greyhound racing industry where animal welfare is a priority and it is our expectation that a significant proportion of the industry funding Tabcorp provides will be used to invest in ensuring high standards are upheld in animal welfare, and integrity.

Tabcorp recently released a position statement on animal welfare (see attachment). The statement outlines Tabcorp's commitment to animal welfare principles which guide our engagement with, and investment in, the racing industry.

Tabcorp also supports ongoing research into the health and welfare implications of animals participating in racing to keep the industry at the forefront of developments.

Conclusion

Tabcorp is proud to support the greyhound racing industry through our strong commercial partnership with GRNSW. It is our expectation that Tabcorp's substantial industry funding contribution will be used to invest in animal welfare initiatives to ensure the highest standards are upheld across the industry.

Whilst Tabcorp acknowledges the substantial progress already made by the existing animal welfare initiatives in operation across Australian racing jurisdictions, we will continue to use our

industry leadership position and our voice to play a meaningful role with our racing industry partners to ensure animal welfare continues to be prioritised and protection mechanisms strengthened and enforced.

As a participant in the industry, we require a zero-tolerance approach to animal cruelty. We look forward to working with the greyhound industry on new initiatives to support animal welfare.

Should you have any further queries, please do not hesitate to me on either
or Emma Murphy, Manager, Government and Industry Affairs
on

Yours sincerely,

Tom Callachor
General Manager – Government & Industry Affairs

Attachment

Animal Welfare Principles

Principles

- Tabcorp expects the needs of racing animals, as set out in the Five Domains model for animal welfare¹, to be met at all times. The Five Domains are:
 - **Nutrition:** Ensure appropriate consumption of water and nutritious foods to maintain health and minimise thirst and hunger.
 - **Environment:** Provide shade or shelter, good housing, good air quality and comfortable rest.
 - **Health:** Prevent or rapidly diagnose and treat injury and disease so animals enjoy good health.
 - **Behaviour:** Provide sufficient space, proper facilities and appropriate company of the animal's own kind.
 - **Mental state:** Promote safe conditions so animals feel safe and secure and avoid mental suffering.
- Tabcorp expects compliance by those involved in the racing industries with all applicable regulations, industry standards, frameworks and codes of practice concerning the housing, training, management, husbandry, racing and transport of racing industry animals.
- Tabcorp supports sustainable and ethical practices throughout the lifecycle of racing animals, this includes current owner accountability and tracking of racing animals by racing authorities throughout their life.
- Tabcorp expects that every effort is made to re-home or re-purpose animals at the end of their racing careers. The welfare of the animal is paramount in all decision-making.
- Tabcorp expects the provision of modern racing environments that prioritises animal and human welfare.

¹ The Five Domains model for animal welfare was developed by Mellor D.J., Reid C.S.W. Improving the WellBeing of Animals in the Research Environment. Australian and New Zealand Council for the Care of Animals in Research and Teaching (ANZCCART); Glen Osmond, SA, Australia: 1994.

- Tabcorp also supports ongoing research into the health and welfare implications of animals participating in racing to keep the industry at the forefront of developments in these fields.

