

Submission
No 32

INQUIRY INTO GREYHOUND WELFARE AND INTEGRITY COMMISSION

Organisation: Grafton Greyhound Racing Club

Date Received: 4 December 2020



Grafton Greyhound Racing Club Ltd

WHO WE ARE

Established in 1913 as the Clarence River Coursing Club, the first meeting was held on the original site at Carrs Creek on the 7th May 1913.

The Club moved to the current site in 1933 and the first meeting was held on 1st April 1933.

In 1937 the name was changed to the Grafton Greyhound Racing Club and has continued to conduct the July Racing Carnival annually in conjunction with the Clarence River Racing Club to this date.

On 10th August 1983, the Club was incorporated as the Grafton Greyhound Racing Club Limited.

OUR CHARTER

Is to provide greyhound racing on premises situated in Cranworth Street, Grafton under licence granted by Greyhound Racing NSW, this includes setting race dates, programming, funding of prize money, providing a safe racing surface for greyhounds and ensuring facilities are provided for spectators that are well maintained.

OUR MISSION

To update facilities, to increase prize money when applicable, to further develop secondary industry and to ensure the Club continues to provide a viable and vibrant venue for Greyhound Racing into future years.

To follow is Grafton Greyhound Racing Club (GGRC) response to each of the Select Committee's terms of reference.

Response to Terms of Reference

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

It is the view of GGRC Member Clubs that as a whole the range *policies, procedures, mechanisms, and overarching principles of the Commission* have moved in the industry in an improved direction. In reality, the industry has had increased resourcing excessively which has allowed a raft of improvements to occur. Examples include digital participant services for licencing, transfer of ownerships and namings, increased frequency of inspections, increased on track resources.

There has however also been a range of over regulation and/or poor approach to regulation applied in our view. Examples include:



- i. *NSW GWIC inspectors are required under the legislation to have no industry experience or connection. While appreciating the conflict of interest connections bring, currently there are a minority of inspectors which treat participants poorly, communicate ineffectively and are therefore pushing people out of the industry. While it is accepted there is a need for irregular inspections to safe guard the integrity and ensure public confidence in how the industry is conducted, being respectful in engagement is imperative and where participants are left intimidated by inspectors actions, it is often hard for them to come forward with their concerns.*

Education of obligations and approaches to functions continues to be the most effective way to address this issue in GCNSW and GGRC's view. Furthermore, providing support and education to non registered spouses, children and other family members is important. It is not uncommon, in what is still a State with predominately hobbyist participants, to have unregistered persons on a property at the time of inspectors arriving unannounced.

- ii. *Provision of three race day stewards to most TAB meetings, driving increased industry regulation costs above per head cost in other States. Further details are provided to this issue and impacts in section (f) of this submission.*
- iii. *Under Legislation, NSW Greyhound Welfare and Integrity Commission is required to pay in accordance with [Government Sector Employment Act 2013](#), this places an increased cost burden on the industry, which detracts funds from other key areas unnecessarily. Further details are provided to this issue and impacts in section (f) of this submission.*
- iv. *Support for all participants to provide significant text documents in audible format, so to enhance regulation understanding.*
- v. *Provide service agreement style documents to aid mutual respect and understanding of all parties obligations.*
- vi. *Consultation has increased over the past three years, with the formation of a variety of Committees, including the legislated Animal Welfare Committee and other groups such as Race Injury Review, Trainers Panel and use of the NSW Greyhound Breeders Owners and Trainers Association. It is GCNSW and GGRC's view that:*
 - a. *Greyhound Clubs NSW has not been utilised despite an initial meeting which highlighted the organisation's formation and objectives.*
 - b. *Recruitment of personnel with industry knowledge and critical stakeholder engagement skills has not been undertaken, resulting in the formation of poor policy and procedures which have been difficult to unwind at consultation stage. GCNSW believe strongly there is a critical need for an industry liaison officer and personnel with operational knowledge of participation and Clubs.*



Both issues in approach remain easily resolved in GGRC's view.

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

GGRC believes that the industry is still in the development stages of industry reform. With Code of Practice released on July 1, 2020 and implementation due January 1, 2021 further work is still required around the assessment of the new industry and therefore the appropriateness of new penalties.

At the current time there is significant industry feedback that a raft of regulation, penalties and offences are over the top and thus eliminating participants from the sport in some cases, but generally stifling breeding. Primarily, concerns exist around resources to aid rehoming and extensive paperwork for breeding and rearing stages.

GGRC strongly believes while there must be ongoing work to the setting of penalties and offences once we first get to a stable baseline of participant numbers, greyhound numbers and track infrastructure so we can understand whether deterrents are genuinely required to regulate the industry. We are still some years in GGRC's view from this baseline development, at which point additional penalties may be considered.

GGRC has significant concern on the legal implications on the Code of Practice stipulating "9.4 It is an offence for a participant to transfer a greyhound in circumstances where the participant knows, or ought to know, or has reason to believe, that the greyhound may be euthanised". Specifically, "...or ought to know..." has no bounds or time limitations. Therefore there are examples where a greyhound may be provided to a new home with family history of illness or behavioural issues that may result in euthanasia. As it is currently written the rule is too open ended and of concern to the industry. Ultimately the use of these open ended rules only hurt the industry by providing opportunity to those opposed to the sport to share individual cases on mass with an intent to harm personal reputation without regard for the specifics of a case.

GGRC would prefer to see a supportive education program applied, rather than the enforcement based approach currently in place. Current Vocational Education and Training (VET) courses have been written at Certificate II and III levels, the equivalent of Year 10 and 12 learning. However, the legal obligations of any participant far surpass this. The Greyhound industry requires the development of plans to commence succession planning to ensure long term viability. It is difficult however to attract new participants to the industry, especially those under 40, when the raft of regulation and understanding of this in depth is onerous, Rules are not scaled for entering participants and therefore the level of penalties applied can be off putting.



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

Options for appeal are sufficient as they currently stand in GGRC's view. However, the cost to undertake an appeal is significant. When weighed up against income generated from the industry, most participants choose not to exercise their right to appeal. In our experience this is important in cases around positives linked to animal husbandry or inadvertent contamination. Participants will often incur the suspension instead of appealing.

The action of suspension also has a significant impact on the participant and their greyhounds. There have been several occasions where participants have had to transfer custody for greyhounds while under suspension, and ultimately those greyhounds and owner have not returned to the kennel. It is for this reason GGRC intends to pursue strongly the review of thresholds on prohibited substances at the forth coming National Rules Review.

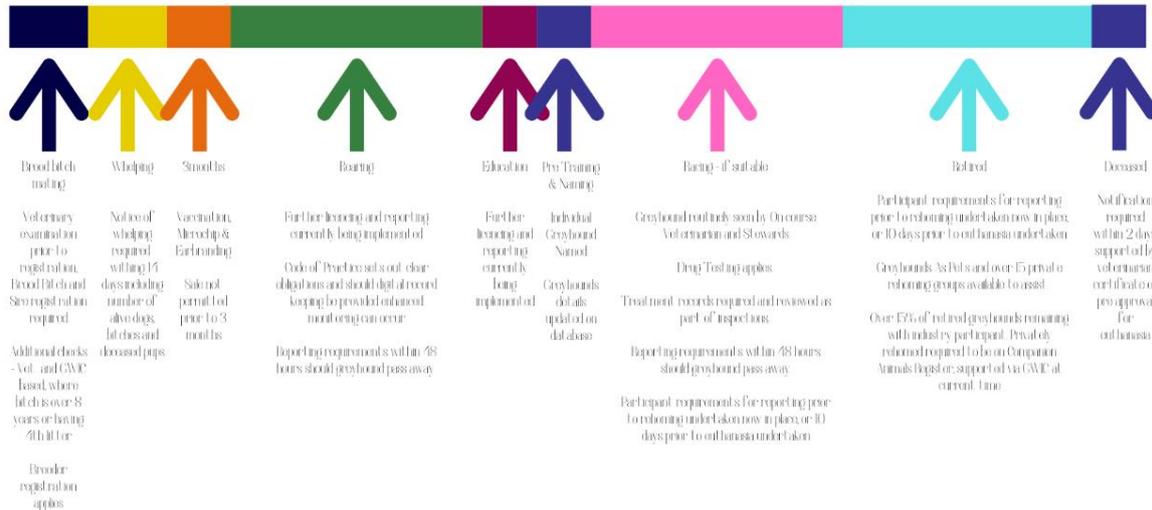
In addition to the cost, there are a range of highly regarded and skilled industry experts which have been disparaged by regulators through inquiry and appeal process. As a result, these people become disinterested in the industry, their skills and knowledge lost, which only has a poor impact to overall greyhound welfare.

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

Clubs and they're stakeholders generally feel the sport is being well showcased to reduce misconceptions about the industry. This includes the increase in public knowledge around integrity touchpoints in any greyhound's life, most which already existed prior to GWIC.



Greyhound Life Cycle and Integrity & Welfare touch points

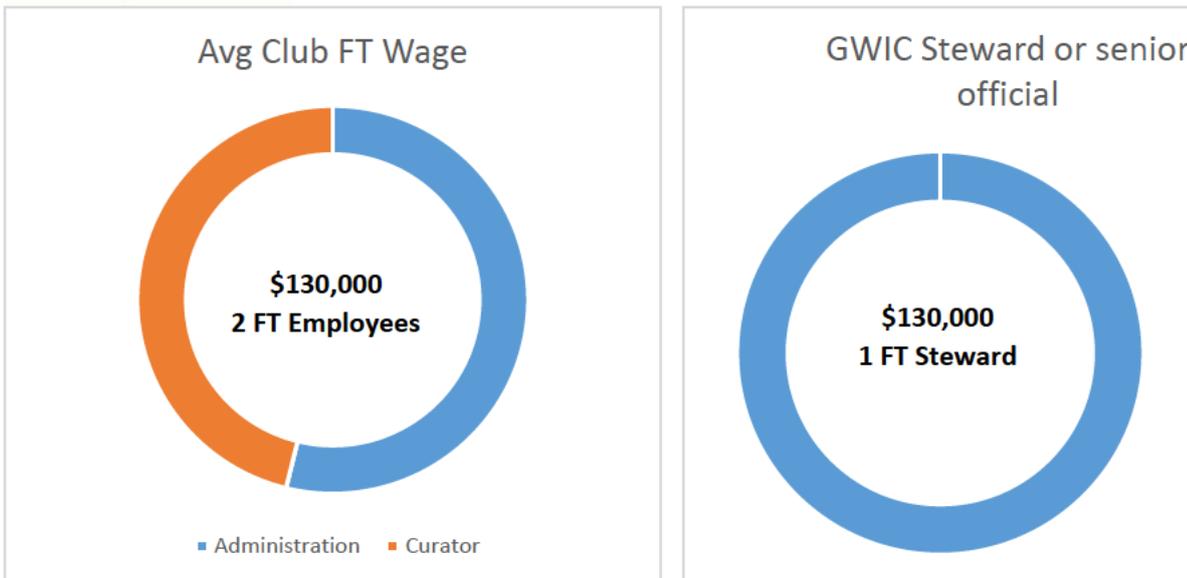


However, underneath a range of positive moves there remains significant concern on the cohesiveness of industry at times, engagement at grass roots levels, transparency of industry future footprint which would allow investment considerations, regionalisation of services and regulation spend.

GGRC has provided a comprehensive response to section (f) of this submission which has cross over to the relationship between the Commission, GRNSW and industry participants (section d).

As a summary, while acknowledging the importance of a strong regulatory arm, such as the Greyhound Welfare and Integrity Commission, the conflict which applies through the requirement for GWIC to obtain predominance of its funds via GRNSW and no clear limitation to the resource levels to be applied so to execute the integrity and welfare functions, is not in the best interest of the industry, its participants and greyhounds. While ever funds are spent at excessive levels, other areas of the industry are left underfunded and as a result poor welfare outcomes will occur.

As an example, Clubs are currently provided funding via GRNSW for Curators and Track Managers. Funds cover just one Curator for 38 hours per week, at a level close to the Racing Industry Maintenance Award 2010. Where racing and trialling requirements demand increased resources there is no additional funding support for this or the upskilling of new staff to provide leave cover and succession planning. On average the wage applied to a GWIC Steward would be equivalent to the Club Manager and Curator combined salaries.



As a result of such excessive funds being directed to the higher per head spend per employee in the areas of regulation and welfare such as Policy development, Veterinary Officers, Race Day Stewards, Inspectors and Investigators, critical Human Resources such as Curators and Club Administration are left under funded. Given injury data outlines the correlation between well prepared and maintained race tracks and injuries, it would appear that funding and how this is managed is not yet meeting optimal welfare outcomes.

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

The NSW greyhound racing industry continues to cross subsidise Thoroughbred and Harness Racing in this State. Multiple reports have previously recommended funding changes given the Intercode agreement disparity. The solutions to date; Point of Consumption Tax (PoCT) and Taxation Parity (Parity) have increased total industry revenue. Ultimately though, what could be collected under PoCT and Parity could be significantly higher if a wagering market share approach was applied, given both forms of revenue are obtained via wagering. Greyhound Clubs NSW support the NSW Greyhound Racing industry position that fair share of funding must be delivered to continue the reform journey and address ongoing concerns in particular around infrastructure and racing surfaces.



Revenue from wagering NSW Government & NSW racing codes

	Race fields fees 2017-18	TAB revenues 2017-18	Tax parity 2017-18	PoCT 2019-20
NSW Government	\$0.00M	\$113.00M	\$0.00M	\$95.00M
GR NSW	\$24.51M	\$35.57M	\$5.15M	\$5.20M
Harness NSW	\$11.29M	\$36.64M	\$6.05M	\$6.00M
Racing NSW	\$118.80M	\$216.98M	\$36.84M	\$28.80M

Source: Estimates made from data included in the annual reports of racing codes and the NSW State Budget 2018/19. Estimate made of NSW Racing TAB revenue due to it not being itemised in the latest annual report - estimate made based on prize money spend; Note that the estimate of \$95 PoCT Revenue for Government will be offset by payments to racing codes.

<http://www.gbota.com.au/Uploads/Election/GBOTA%20-%20Fact%20Sheet%201%20page%20revenue%20and%20distribution2.pdf>

As was outlined in 2017 by the Alliance, individual Clubs and the NSW GBOTA, in response to the NSW Greyhound Racing Reform Panel's recommendations, the industry cannot have significant regulation imposed without the funding to support these measures being achieved. To do so, only continues restrict the industry and outcomes that can be met. This is not in the interest of Government, the Public or Industry.

It is flawed in GGRC's view to solely focus on the funding division between Greyhound Racing New South Wales and the NSW Greyhound Welfare and Integrity Commission for the funds which currently flow to the industry. We believe this approach only undermines the overall welfare objectives the industry is committed to. GGRC strongly believes in addition to the fair share of funding the industry is entitled to, which can be undertaken via Government consolidated revenue obtained via PoCT, all parties can better utilise existing funding. We believe this would ensure that revenue can be directed to key areas of infrastructure, participant returns, attraction and education of new participants so to ensure industry sustainability and reform.

Without our fair share of funding however, projects must be prioritised, areas left unaddressed which can only lead to poor welfare outcomes.

GGRC's submission to the Greyhound Racing Act review undertakes a minor level of analysis into the utilisation of industry funds. Further analysis is provided under this submission's section **(f) the actions, conduct and effectiveness of the Commission and GRNSW, in particular in relation to its role in improving the welfare of greyhounds**. Below we identify specific areas of spend which we believe can be reduced, primarily through legislative change, so to redirect and update infrastructure and prizemoney returns to participants, where there is currently the most significant shortfalls.



Ultimately, without the industry's fair share of funding the full raft of industry reform cannot be achieved. This point was clearly made in 2016 and remains relevant today. Examples of areas where additional funds can be spent for the betterment of welfare throughout the greyhound's life:

- Regionalisation of rehoming facilities including short stay accommodation and transition facilities such as the one GRNSW has recently invested in take both cash reserves and human resources in order to achieve the objective of providing an opportunity outside of racing for all healthy greyhounds, thus reducing unnecessary euthanasia.
- Track infrastructure upgrades. Based upon the draft minimum track standards, it is GGRC's belief that significant additional funds will be required to ensure and ideally surpass compliance. Examples include sound proofing and air conditioning each individual race kennel bay. Kennel refits will exceed \$400,000 per site based upon initial quotations GGRC has undertaken. This project alone, across just TAB venues is \$7.6M, \$13.2M to cover all venues. Running Rails, enhanced lure systems with braking, renovated starting boxes to include cleated matting so to allow greyhounds to gain traction at race start will all cost a further \$400,000 per venue.

A range of venues also require upgrade of their irrigation systems to ensure consistent water content in each racing and trialling track at any given time. There is significant data which demonstrates the correlation between a well prepared, consistently watered track and reduction in racing injuries. While track surfaces and preparation are not the only contributing factor to injuries, they remain a significant proportion which can be easily addressed with correct resources, infrastructure and funds. Estimated cost per project \$200,000 estimate minimum of 12 needed, thus \$2.4M.

- Examples provided are just a small section of the infrastructure works which can and should occur. GGRC believes that the inclusion of these examples should demonstrate to the Select Committee the critical need for adequate industry funding to be undertaken urgently, so to increase measurable welfare benefits being implemented.
- Veterinary Clinics and recovery centres - As further covered in submission section **f.4.iii** Access to skilled and engaged veterinarians in regional areas is of significant concern to participants. Over the course of a number of years, renowned industry Veterinarians have been pushed out of the industry, with participants and their greyhounds ultimately suffering. Allocation of the industry's fair share of funding would allow the development of Veterinary Clinics and recovery centres in regional areas as part of the Centre of Excellence models and business diversification.



- CCTV; Given the current shortfall in funding, the implementation of Closed Circuit Televisions for all race bays and kennelling areas at racing and trialling venues, as well as education centres has not been implemented. The enhancement of these systems is not only important to integrity and providing consumers with confidence but also aiding animal welfare supervision and additional data for analysis when undertaking policy or procedural development.

Consistent with GGRC's submission to the Greyhound Racing Act 2017 review, we recommend:

1. *NSW Greyhound Racing industry to receive its fair share of funding derived from Point of Consumption Tax and Tax Parity.*
2. *GWIC, should it remain as currently legislated, to be directly funded via the NSW Government utilising Point of Consumption Funds to a determined level set by GRNSW and reflective of the outcomes of this inquiry. GGRC estimate this to be no greater than \$12M per annum.*
3. *Appropriate Industry Award to be developed, consistent with other State's Racing sectors to ensure wages figures are in line with expected skills and experience across Australia for each role.*

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

It is regularly perceived by those external to the greyhound racing industry, that the welfare of any greyhound is limited to areas such as rehoming, injury or illness treatment, diet and exercise. The reality is welfare is intertwined in all aspects of greyhound racing. It is therefore difficult to exclude areas of business across both the Commission and GRNSW as part of this review. To provide clarity, GGRC has sought to provide submission to key areas:

1. Code of Practice

The Code of Practice, set for implementation in January 2021, has increased a raft of participant standards. It is noted that from the draft version to the final, prime changes have occurred in the area of increasing individual kennel sizes to 3.5m², requirement of two barriers; which has not been thought out appropriately in terms of its implementation.

While the Code sets out ten years, for participants intending on staying within the industry to upgrade facilities to meet the Code's minimum kennel size, the cost to meet this will be significant. There is no evidence to support the increased animal welfare outcomes of greyhounds be housed in kennels of 3.5m² rather than current regulation of 3m². This increased cost burden to make the required changes only placed further pressure on industry participants to:



- a) Support industry involvement with paid work, often limiting the additional enrichment opportunities which can be undertaken with each greyhound
- b) Requires industry returns, through prizemoney, to significantly increase to ensure investment in the sport is considered viable
- c) Exit the industry

To support easy compliance, data for analysis and monitoring systems to better aid regulation, digital systems for record keeping would be beneficial. A project such as this however can not be funded without further industry funding.

2. Swabbing Policy and procedures

GGRC awaits the industry's full review of the Racing Rules, including prohibited substances due early in 2021. GCNSW will use this opportunity to pursue a full review of the racing rules with specific attention to items such as:

- The impact of increased testing sensitivity in detecting animal husbandry based positive tests. Examples include detection of participants personal medication, caffeine and theobromine which can come from inadvertent continuation such as chocolate, coca-cola etc. Suspending or disqualifying registered persons for these types of infringements does not benefit the industry of individual greyhounds.
- Currently testing is after the race is undertaken at the Direction of Stewards, by mandatory requirement due to being a feature race event or all events at Wentworth Park Greyhounds (City meetings). As a result of these procedures excessive testing is undertaken, spending funds inefficiently and ultimately not addressing any genuine performance enhancing practices which may be taking place. A more sophisticated testing procedure is needed, along with reimplementing of the random ballot (red marble) process. The inclusion of a random process would implement an increase in transparency and unpredictability which seeks to keep any participant undertaking the wrong thing in check.

It is GGRC's view that not enough has been done in this space and the justification of positions has been based on data obtained post regulatory changes without data to reference to pre changes. Despite a drive for more evidence based policy and procedures, it is our view that there has not been significant changes in this regard.

Further, education to ensure staff are adequately skilled in capturing of samples is important. At the current time Club's incur the majority of cost to train staff.



3. Injury and Illness detection and treatment

While all greyhound meetings are conducted with the presence of a registered on track veterinarian, the environment is not always conducive to making a sound diagnosis. Further, over the past 10 years the skills and training for Vets to be well versed in greyhounds, their anatomy, behaviour, prognosis of recovery and implications of any substance being administered in line with the racing rules has significantly declined.

Further work is required in the development of the industry's future footprint, upgrade of facilities so to allow greater injury detection equipment to be available to on track veterinarians. As raised in submission section f.4.iii, access to after hours veterinarians skilled in greyhound management remains difficult for regional participants. This is made even more challenging by the cost burden placed on participants for after hours access.

4. Human Resources

As will be outlined below, the legislative requirement for NSW GWIC staff to be paid under the [Government Sector Employment Act 2013](#) is costing the industry in excess of \$1.5M annually. These estimations do not have regard for the duplication of services which also occur in Board costs, Executive Management, Legal Services and incidentals such as rent. We believe strongly to optimise industry funds available for more critical areas of animal welfare action, development of an industry award is imperative.

GGRC has made every attempt to ensure the figures presented are accurate, however it does not have access to individual State data to ensure figures are infallible. Figures have been gathered through use of public record information such as Annual Reports, Media Releases and Job Advertisements.

i. Stewards

As highlighted in submission point (a) ***the policies, procedures, mechanisms, and overarching principles of the Commission in relation to industry participants***; GWIC still predominately appoints three or more stewards to TAB race meeting control and integrity. Given the Legislative requirement to pay in accordance [Government Sector Employment Act 2013](#) there is significant concern on the use of industry funds to support this function. GGRC believes strongly that should administrative assistance be required to complete Race Day integrity duties then an adequately skilled person/s at the appropriate Public Service role ranking (eg: 3/4) can be allocated in lieu of a third on course Steward.



Furthermore, it is GGRC’s understanding that for the same duties of Race Day functions, Stewards are paid considerably less in other States.

State	Avg FT Salary*	Variation to GWIC	Variation Per Annum impact to NSW
GWIC	\$130,000		
Under GRNSW	\$85,000	\$45,000	\$900,000
Victoria	\$90,000	\$40,000	\$800,000
Queensland	\$65,000	\$65,000	\$1,300,000
South Australia	\$80,000	\$50,000	\$1,000,000
Western Australia	\$85,000	\$45,000	\$900,000

** data has been obtained using Annual Reports, Job advertisements and publicly available documents. GRNSW Salary has had CPI applied to ensure reflective of 20/21 figures to ensure reflective of current rates. Assumes 20FT equivalent Stewards within GWIC obtained via Stewards Reports.*

ii. Inspectors

GGRC acknowledges the need to have Inspectors and routine inspections. As previously highlighted, we appreciate the why legislation mandated no industry experience or connection for those appointed as Inspectors. As a result of this approach however, individual employee skills and approach to participants has varied significantly. Further training for Greyhound specific issues should continue to be encouraged, as well as an overall approach of education and upskilling rather than authoritarian.

Consistent with section (f.4.i) Stewards, GGRC strongly believes that the Legislation limitation of employment under [Government Sector Employment Act 2013](#) increases the unnecessary overspend as compared to other States.

State	Avg FT Salary*	Variation to GWIC	Variation Per Annum impact to NSW
GWIC	\$110,000		
Under GRNSW	\$85,000	\$25,000	\$300,000
Victoria	\$85,000	\$25,000	\$300,000
Queensland	\$85,000	\$25,000	\$300,000
South Australia	\$80,000	\$30,000	\$360,000
Western Australia	\$85,000	\$25,000	\$300,000



* data has been obtained using Annual Reports, Job advertisements and publicly available documents. GRNSW Salary has had CPI applied to ensure reflective of 20/21 figures to ensure reflective of current rates. Assumes 12 FTE based upon industry knowledge of personnel.

iii. Oncourse Veterinarians and their link with Veterinary Practices

Access to skilled Veterinarians, with knowledge of how to treat and issues facing the Greyhound Racing industry, remains one of the most significant concerns for participants, particularly in regional areas.

Cost for treatment in regional areas is 250% above that to metropolitan facilities, with no experienced greyhound vets in regional NSW. This lack of services and increased costs elevates the challenges for participants to meet the best possible welfare outcomes for all of their animals. As a result, many participants from our region spend additional hours travelling to seek appropriate veterinary consultation for their greyhounds. This only places them at greater risk on our roads. This fact is often not considered by those opposed to the greyhound racing industry, nor the cost worn by participants to seek after hours care should they encounter an issue post racing or trialling. Greyhound racing as a code is still predominately conducted after 6pm, resulting in many participants returning home after 11pm on racedays. Given the requirement under *Prevention to Cruelty Animals Act* and *Greyhound Racing Act, Regulations and Code of Practice* for participants to seek immediate veterinary care for an injured or ill greyhound, there is a natural costs which comes with this responsibility. GGRC believes that with the upgrade of regional sites to Centres of Excellence and through the industry receiving its fair share of funding that issues such as access to skilled veterinarians at reasonable costs can be addressed.

GGRC also strongly believes that the Legislation limitation of employment under [Government Sector Employment Act 2013](#) increases the unnecessary overspend as compared to other States.

State	Avg FT Salary*	Variation to GWIC	Variation Per Annum impact to NSW
GWIC	\$130,000		
Under GRNSW	\$85,000	\$45,000	\$360,000
Victoria	\$90,000	\$40,000	\$320,000
Queensland	\$85,000	\$45,000	\$360,000
South Australia	\$85,000	\$45,000	\$360,000
Western Australia	\$85,000	\$45,000	\$360,000

* data has been obtained using Annual Reports, Job advertisements and publicly available documents. GRNSW Salary has had CPI applied to ensure reflective of 20/21 figures to ensure reflective of current rates. Assumes 8 FTE based upon Stewards Reports.



iv. Industry skills and training

Recruitment of personnel with industry knowledge and critical stakeholder engagement skills has not been undertaken, resulting in the formation of poor policy and procedures which have been difficult to unwind at consultation stage. GCNSW believe strongly there is a critical need for an industry liaison officer and personnel with operational knowledge of participation and Clubs.

In addition, while understanding licencing is a requirement under the Greyhound Racing Regulations, licencing of Race Day officials has place further paperwork and challenges upon Race Clubs. Recruitment and training of staff is already difficult, with low hourly rate and inconsistent shifts at times. Work has been undertaken with GWIC to have a grace period prior to mandatory licencing for raceday officials, however the additional cost remains an impost on Clubs.

5. Track Infrastructure and Racing surfaces

In 2017, when implementing 121 of the 122 Greyhound Racing Industry Reform Panels recommendations, the NSW Coalition Government allocated \$30M for the upgrading of facilities to ensure increased racing safety for all greyhounds. To date only \$7M of these funds have been utilised to GCNSW GRC's understanding, and the list of required works far exceeds the unallocated \$23M in funds.

Just a few examples include; sound proofing and air conditioning each individual race kennel bay. This project alone, across just TAB venues is \$7.6M, \$13.2M to cover all Kennel refits will exceed \$400,000 per site based upon initial quotations GGRC have undertaken. venues. Running Rails, enhanced lure systems with braking, renovated starting boxes to include cleated matting so to allow greyhounds to gain traction at race start will all cost a further \$400,000 per venue, a further \$7.6M at TAB sector, \$13.2M across all venues.

A range of venues also require upgrade of their irrigation systems to ensure consistent water content in each racing and trialling track at any given time. There is significant data which demonstrates the correlation between a well prepared, consistently watered track and reduction in racing injuries. While track surfaces and preparation are not the only contributing factor to injuries, they remain a significant proportion which can be easily addressed with correct resources, infrastructure and funds. Estimated cost per project \$200,000 estimate minimum of 12 needed, thus \$2.4M.

In these three projects alone \$28.8M is utilised, and we haven't even scratched the surface of further work which can be undertaken to upgrade each racing site to ensure



optimum cross fall, internal drainage and water storage for water management and drought proofing. All of the above projects optimise welfare for the greyhound.

Further to the above examples, no substantial work has been undertaken to implement race track design changes, with particular regard for removing bend starts. Recommendations on the removal of bend starts, use of roll on and off boxes and straight track racing have been supported by UTS work. Allocation and access to existing and additional race safety funds are critical to addressing these matters.

6. Grading and Box Draws

Greyhound Racing NSW continue to undertake work on the adjustment of the current Grading Policy to maximise racing opportunities for each greyhound in like for like company.

A sound grading system maximises the racing career of a greyhound, minimises the number of greyhounds required to be bred and ensures competitive racing of interest to the wagering public.

Further racing analysis is being undertaken in Committees such as the race injury review panel and Animal Welfare Committee, however it is broadly understood by GGRC that there is a correlation between injuries sustained and the grouping of mismatched greyhounds. This is why it is critical in our view to have grading and programmed events which group greyhounds by total wins, times and on occasion's age or sex.

The continuation of a Non TAB sector would also allow further evaluation of preferential box draws and reduced field sizes. Preferential box draws would allow the assessment and grading of individual greyhounds which in particular demonstrate a strong tendency to run in (rail) or out (wide runner). Be again seeking to group these runners in a given event, racing interference which traditionally leads to injuries or soreness would be reduced. This again has positive outcomes in extending a greyhounds racing career, minimising demand on rehoming and breeding.

7. Industry returns (Prizemoney)

Over the past 3 years, work has been undertaken to increase a range of prizemoney returns, most notably through the elevation of TAB C events to TAB B levels; now referred to as Provincial Racing. GGRC believes this along with events such as the Million Dollar Chase there have been positive outcomes to the industry and individual greyhound welfare.



With greater returns, participants are able to invest in:

- Upgrades to facilities – air conditioning, increased shade, replacement of fencing, newer housing
- Upgrades equipment more frequently – bed, muzzles, leads, trailers, vehicles
- Utilise well performed sires when breeding
- Travel more frequently to access specialist greyhound veterinarians
- Upgrade of the types of feed used; eg premium kibbles

At the implementation of travel allowance a significant increase to the welfare of greyhounds was observed by industry administrators. This routine amount of funds aided participants in seeking additional precautionary veterinary reviews prior to racing, higher grade feeds and improvement to facilities.

Where these routine amounts can be routinely increased the improvements to greyhounds across the State are seen. GGRC believes that industry returns and infrastructure work are the two key areas which have not received adequate allocation of the increased industry revenue. Given the link to increased individual animal welfare outcome participant returns must remain a key priority for the commercial operators of the industry.

8. Chase stimuli

Greyhound Racing Act Section: 41 Prohibition on keeping certain animals on premises where greyhounds are kept etc

(3) An exemption order may not specify possums or rabbits.

*(5) In this section— **animal** includes the carcass, or the skin or any other part, of an animal. **keep** an animal includes having possession or control of the animal.*

GGRC believe it is important at this review to seek removal of skin and other part of or animal based products from legislation and allow development of Policy, Rules and or Regulations managed by GWIC. The implementation of GWIC has addressed the conflict which existed within the industry and through the use of enhanced investigation strategies, reporting systems and broadened relationships (RSPCA, DPIE) we believe there is a need for the industry to review the impacts of removing tangible rewards and scent based stimuli from the training of greyhounds.

The implication of this applies not only to training for racing but also re-training post racing for companion based roles and lifestyles. At the current time no analysis in GGRC's view has been undertaken to assess the impacts of removing tangible rewards and chasing stimuli. GWIC's 2018/2019 Annual Report shows 370 incidents of Marring, Failure to Pursue, Failure to Pursue due injury or Unsatisfactory Performance, this coupled with bred but unnamed numbers means more can be done to provide



strategies and opportunities for these greyhound to race or have a post racing lifestyle. Ultimately this analysis must be conducted to support a well-considered policy and regulation framework. GGRC believes however it is important that removal of at minimum animal products gives greater scope for the review to occur and policy to be developed and implemented for the betterment of the greyhound and its training regime.

9. Rehoming

Significant industry funds have been directed to the ongoing development and expansion of the Greyhounds As Pets program. The official rehoming program for the industry seeks to ensure greyhounds are desexed and well matched with their future home environment. Work in the Code of Practice due for implementation January 2021, makes it a requirement for greyhounds which are being rehomed to be desexed.

Over the past 18months, resources have been dedicated to the regionalisation of Greyhounds As Pets, making the program more accessible to industry participants. These regional programs are extremely positive as they seek to match greyhounds with persons in the area. This removes the need for foster caring in between and provides new owners with additional support which has been well received. In addition, it allows greyhounds to be cared for by their former trainer or owner in the event new owners are on holiday or other personal reasons.

It is GGRC's view that further opportunities to have training programs for companion animals programs (army veterans, nursing homes etc) is important to expanding suitable post racing lifestyles for greyhounds. These types of opportunities are ideal for greyhounds given their short hair/clean nature, low exercise requirements (30mins a day) and overall relaxed temperament.

(g) any other related matter.

GGRC has covered all critical items in its view across the breadth of the Select Committee's scope.



Conclusion

GGRC welcomes the opportunity to positively contribute to the Select Committee and establishment of clear boundaries which both ensure appropriate industry regulation but also efficient use of funding.

Should industry regulation continue in its current format under the NSW Greyhound Welfare and Integrity Commission, it is critical that:

- GWIC is funded via consolidated revenue, utilising State revenue obtained through Point of Consumption Tax or Taxation Parity.
- The industry receives its fair share of funding so to allow critical welfare matters such as infrastructure to be addressed.
- Formation of a Greyhound Racing or Racing Industry Award which accounts for integrity based roles so to reduce the cost per position currently being absorbed due to the [Government Sector Employment Act 2013](#).
- Increase in industry consultation to ensure Policies and Procedures have regard for industry practicalities and are able to meet objective.
- Employment of adequately skilled staff with Industry knowledge and experience to aid in the formation of appropriate Policies and Procedures.
- Employment benchmarks set to ensure industry regulation and welfare requirements can be met without overstaffing and cost incurred.
- Development of reporting systems which minimise impact of record keeping requirements and enhance data capturing for analysis and use in the formation of appropriate Policies and Procedures.
- Implementation of an education and licencing system which allows for ongoing participant and education, penalties applied reflective of participant experience, learning and role in industry.
- Thorough review of rules of racing to reduce over regulation, has regard for increased testing capabilities/sensitivities and difference between animal husbandry based issues verse deliberate performance enhancing actions.