

**Submission  
No 33**

## **INQUIRY INTO GREYHOUND WELFARE AND INTEGRITY COMMISSION**

**Organisation:** Humane Society International Australia

**Date Received:** 4 December 2020

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## HUMANE SOCIETY INTERNATIONAL

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

By email: [GWIC@parliament.nsw.gov.au](mailto:GWIC@parliament.nsw.gov.au)

4 December 2020

Dear Select Committee,

### RE: INQUIRY INTO THE GREYHOUND WELFARE AND INTEGRITY COMMISSION

Humane Society International (HSI) welcomes the opportunity to provide feedback for the inquiry into the Greyhound Welfare and Integrity Commission (the Commission). We offer the comments and recommendations below on behalf of our 70,000 Australian supporters.

HSI feels strongly that the use of greyhounds for racing and gambling poses so many risks to animal welfare that it is untenable and should be prohibited. The industry repeatedly puts financial considerations before the welfare of the dogs with routine cruelty inflicted on the dogs and high levels of criminality. We regret that Australia is one of just 8 countries in the world that continues to allow this industry. Stronger regulations are urgently needed, particularly when this industry is subsidised by the NSW public, many of whom oppose it.

HSI submits the recommendations below in response to the points set out in the Terms of Reference for this inquiry:

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

The Government accepted the recommendation by *The Greyhound Industry Reform Panel* concerning the rehoming of dogs, and as a result the euthanasia of a healthy greyhound is currently acceptable. HSI recommends that the euthanasia of healthy greyhounds should be prohibited, and the Greyhound Rehoming Policy must be amended accordingly.

The current level of transparency concerning the fate of NSW greyhounds that are no longer required to race is inadequate, and HSI recommends that the information should be made publicly available, thereby avoiding any dispute and providing more accountability. If these records are available, they should be released to the public with immediate effect.

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

Currently, with a limit of 200 penalty units that can be imposed at \$110 per penalty unit, the maximum fine for an individual is \$22,000. HSI suggests that the penalties for animal cruelty, substance-related offences, and other violations are too lenient and recommend they be strengthened. We would also like to see effective use of the maximum penalties currently available.

*(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*

It is highly inappropriate for the industry operator, Greyhound Racing NSW (GRNSW), or industry participants, to directly influence the regulations, policies, and procedures set by the Commission. Instead, GRNSW and industry participants should ensure they operate within the regulations set by the Commission, rather than influencing them in any way.

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

To avoid any conflict of interest, the funding of the Commission should come directly from the NSW government, with the government recouping all funds from GRNSW and the gambling industry via taxation. It is not appropriate for a commercial entity to provide funds directly to a government entity that regulates its' activities.

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

The fundamental role of the Commission is to protect and improve the welfare of greyhounds, but its ability to successfully achieve this objective is clearly hindered. To help ensure greyhounds used in this industry are protected adequately, it is essential for the Commission to continue to operate, and ensure there is separation between the commercial and regulatory functions to minimise the potential for conflicts of interest. HSI recommends that the functions of the Commission are expanded whilst maintaining its focus on

greyhound welfare, and for the NSW government to ensure the Commission operates independently from GRNSW.

The Greyhound Racing Act 2017 currently places constraints on the Commission, as does the Greyhound Welfare Code of Practice, and amendments to the Act and to the Code would see significant improvements for greyhound welfare. For example, the Commission needs to be awarded greater authority to monitor, track and inspect greyhounds owned by persons who are not registered industry participants. Also, the Commission should be able to set maximum breeding numbers, set the maximum number of greyhounds permitted in a race, and have the authority to close or influence racetrack designs over safety concerns.

The effectiveness of the Commission would also be improved if they recruited more inspectors, as they currently only have 11 which equates to one inspector per 2,441 greyhounds. More inspectors could then conduct annual welfare checks on each greyhound as part of a whole of life tracking program. It is imperative for every greyhound to be accounted for throughout their lives.

As stated in previous submissions, HSI recommends that the NSW government should be required to fund greyhound sanctuaries and greyhound private re-homing organisations.

Racing on oval tracks has been proven to result in significantly higher rates of injury and death when compared to straight tracks. Developing purpose-built straight tracks was a key recommendation of the University of Technology Sydney in their report into greyhound racing track design, yet it has not been implemented. HSI recommends that the Commission ensures track safety is appropriately considered. Also, reducing the number of racing dogs to six per race would help to reduce incidents of injury as well as death rates.

Again, penalties for animal cruelty, doping and other violations need to be strengthened to act as a suitable deterrent, preventing individuals from offending, with stronger investigatory and enforcement powers to ensure the industry is better regulated.

Reducing breeding is also paramount for improved greyhound welfare. Maximum breeding targets need to be set within the state.

HSI also proposes that the Commission publishes the number of greyhounds exported from NSW interstate to ensure accurate tracking of every dog.

*(g) Any other related matter*

Incidents of cruelty or neglect of a greyhound must be reported in every instance.

We hope this submission will help progress the welfare of greyhounds within the state. Please forward any correspondence in relation to these submissions by email to myself at

Yours sincerely,

Georgie Dolphin  
Program Manager – Animal Welfare  
Humane Society International