

**Submission
No 38**

INQUIRY INTO GREYHOUND WELFARE AND INTEGRITY COMMISSION

Organisation: Greyhound Rescue Inc

Date Received: 4 December 2020

The Honourable Members
The NSW Legislative Council's Select Committee on the Greyhound Welfare and Integrity Commission

About Greyhound Rescue

Greyhound Rescue Inc (**GR**) is a volunteer organisation established in 2009 to find homes for greyhounds excess to racing needs. GR is a registered charity with kennel facilities south of Sydney. GR's has a no kill policy and only euthanise due to terminal illness/quality of life, not temperament or ease of rehoming. GR accepts greyhounds in need and does not discriminate on the grounds of age/colour/sex, and accepts injured or deformed dogs.

GR receives dogs who are surrendered by trainers and people who are unable to keep their greyhound due to changed circumstances, as well as from pounds throughout NSW. We receive numerous dogs who have failed the GAP assessment for being timid, not dog-friendly or small dog friendly, and continue to work with those hounds through positive reinforcement until they are ready for adoption.

Submissions on Greyhound Welfare and Integrity Commission (GWIC)

GWIC independent oversight of animal welfare standards

GR believes that one of the most important aspects of GWIC is that it is independent. This independence has allowed GWIC to make good inroads in improving greyhound welfare standards in the industry. Prioritising animal welfare should be paramount for the industry and the government and is expected by the community. As an independent regulatory body, people are also able to raise animal welfare concerns and report abuse with a belief that they will be impartially reviewed and investigated.

GWIC's principle objectives are to promote and protect the welfare of greyhounds, to safeguard the industry's integrity and to maintain public confidence in the industry. Prior to GWIC, the industry itself was responsible for overseeing its own commitment to animal welfare standards. The deficiencies of that oversight culminated in the McHugh Inquiry and Report which found that there were conflicts of interest, shortcomings and often a complete failure to implement even basic animal welfare standards.

The failure to promote and enforce even minimal animal welfare standards resulted in community outrage and brought the industry into disrepute. As public money is expended on GWIC and GRNSW, community expectations must be met. GR believes that the only way to ensure animal welfare standards and to meet community expectations is for GWIC as an independent body to retain and improve its oversight over the greyhound racing industry. Blurring the lines between participant, industry, and regulatory oversight would weaken governance of the industry and lead to a view, at best, of an apprehension of bias in decisions made by the industry in favour of its own participants.

Impartiality remains the key to success, and GWIC is in a position to provide that. Should the government continue to fund the racing industry it is imperative that the government ensures that welfare standards are gold-class and that the safety and wellbeing of the animals is of the utmost priority.

Policies, Codes of Practice and oversight of the Greyhound Racing Act 2017

GWIC's work is only in its infancy and is very much a work in progress.

However, it has been responsible for the public consultation process for the new Greyhound Welfare Code of Practice. The requirement for this code was a primary recommendation of the Lemma Reform Panel and a condition on the industry from the NSW Government and Parliament to overturn the ban on greyhound racing.

GWIC has an important role in overseeing elements of the *Greyhound Racing Act 2017* particularly in improving standards and bringing in Codes of Practice within the industry which accord with community expectations, and it is important that Codes of Practice and oversight remain independent of the industry itself. The industry has a track record of failing to implement Codes of Practice which could survive public scrutiny regarding the welfare of the animals, resulting in public outrage and the short-lived proposed banning of the greyhound racing industry.

Of concern is the strong resistance to these Codes of Practice by many participants in the industry which raises serious questions about the industry's willingness to maintain and continue to improve standards should they be permitted to self-regulate. GR believes the community does not wish to see a return to the low-level standards evidenced in the McHugh Report.

It is GR's opinion that should the industry wish to make real and significant improvements - including bringing in fair and robust Codes of Practice - then it is best done by an external and independent body that is properly and adequately funded by the industry.

Disciplinary action by an independent body

It is important the disciplinary action against those who breach the Codes of Practice, Act and Regulation and who threaten to undermine the industry in the eyes of the community, is undertaken by an independent body to ensure community faith in the system. External regulation ensures there is no actual bias or apprehension of bias that the industry is looking out for, and protecting, its own participants who are not meeting animal welfare standards.

It must be remembered that any participant who is dissatisfied with any decision made by GWIC has a right of review by the Racing Appeals Tribunal and ultimately the Supreme Court of NSW. Anyone who believes that an independent supervisory body is not acting fairly or has erred in its decision, **has the same right as any other person in NSW** to seek an administrative and judicial review of an adverse administrative decision. Such a review system for these decisions ensures that members of GWIC act fairly and honestly in making impartial decisions.

As GWIC is part of the Department of Customer Service its members may also be held accountable by the NSW Ombudsman and the Independent Commission Against Corruption, hence they must act honestly, fairly, without personal favour or conflict of interests.

It is essential that disciplinary decisions are made in good faith by an independent body which is subject to the scrutiny of our courts and parliamentary processes.

Policy changes

At a minimum, we are of the view that all greyhounds should be given access each day to outdoor space and not contained in a kennel all day.

GR's view is that education of participants in animal welfare standards and prevention of illness is key to improving welfare standards within the industry. We believe that GWIC is independent and forward-thinking in its approach to animal welfare, and that the only opportunity the participants in the industry have of undertaking further education is for GWIC to continue as the regulator with oversight of the industry.

Thank you for your consideration of our submissions.

Yours sincerely,

President
Greyhound Rescue Inc