

**Submission  
No 48**

**INQUIRY INTO GREYHOUND WELFARE AND  
INTEGRITY COMMISSION**

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**Date Received:** 4 December 2020

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## **SUBMISSION TO THE PARLIAMENTARY COMMITTEE INQUIRY INTO THE GREYHOUND WELFARE AND INTEGRITY COMMISSION**

The following is my submission to the Parliamentary Committee Inquiry into the Greyhound Welfare and Integrity Commission, which the NSW Government has called for.

It is my personal view that Greyhound Racing should be banned in NSW as it is in many other jurisdictions of the world. It is a sport based on the use and abuse of animals for profit in gambling neither of which contributes positively to our society. However, whilst Greyhound Racing is in existence in NSW I agree with the Government that it is very important that the Greyhound Welfare and Integrity Commission (GWIC) is retained to monitor and improve animal welfare in this industry. However to ensure that animal welfare is maintained as a priority and to limit the suffering of greyhounds that are trapped within this industry it is essential that the functions and responsibilities of the GWIC are expanded to cover all aspects of the industry and all dogs bred by the industry.

My concerns will be addressed in response to each of the terms of reference as follows:

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

The killing of healthy dogs in the greyhound racing industry is unacceptable. The greyhound rehoming policy must be amended so that all dogs born into the industry are tracked for whole of life and no healthy dogs are killed. I use the word 'killed' deliberately as the meaning of the word 'euthanasia' is the practice of intentionally ending a life to relieve pain and suffering. And if a greyhound is not enduring pain and suffering then it is 'killing'. The killing of healthy dogs must be prohibited.

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

1. retain 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. euthanase the greyhound.

For a rehoming policy to permit euthanasia (killing) as an option is most certainly not in the welfare interests of the dog unless the dog is injured or suffering from an illness and has no quality of life.

GWIC is also only obliged to track those greyhounds who have been retained by an owner or trainer. Greyhounds rehomed privately by an owner or trainer to another person could be killed /euthanased following their rehoming and GWIC is not required to be notified. Greyhounds 'dumped' in pounds, which as a rescuer is something I am familiar with, can and

are killed. And it is even possible that dogs accepted by an animal welfare organisation or rescue group could also be killed unless they are recognised as a 'no kill' rescue group.

The Coalition for the Protection of Greyhounds (CPG) has analysed the fate of NSW greyhounds who are no longer required by the racing industry over the last three financial years. The analysis, reveals that thousands of greyhounds cannot be accounted for. The NSW Govt must via the GWIC be able to identify all greyhounds by their racing name, ear tattoo number and their microchip number to prove their existence and whereabouts.

The Greyhound as Pets Program (GAP) has a poor record when it comes to rehoming greyhounds. The GAP rehoming assessment fails many greyhounds and does not ensure that greyhounds are given every opportunity to have a life outside of the industry. I have heard of perfectly sound and good dogs being rejected by the GAP assessment and even of dogs that have passed the GAP assessment and still being killed /euthanased.

An excessive number of dogs are bred into the industry and because many are rejected or not considered profitable there is an excess of dogs from the industry needing homes. There needs to be a reduction in the number of greyhounds bred by the industry. There also needs to be sanctuaries established for dogs to undertake training to adapt to life as a companion animal and for some to live out their natural lives.

### **Recommendations**

The Greyhound Rehoming Policy must be amended and there must be a ban on the killing/euthansia of healthy greyhounds born into the industry.

GWIC must be held responsible for tracking all dogs bred into the industry for their whole of life.

GWIC must set the behavioural assessment standards used by GAP to assess a greyhound's suitability to be re-homed in a private home.

There needs to be a reduction and a cap put on the dogs being bred by the industry.

Greyhound sanctuaries need to be established.

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

Current disciplinary actions for breaches are inadequate and fail to provide appropriate penalties to act as a meaningful deterrent.

Penalties awarded against industry participants for administering a prohibited substance should be substantially increased to reflect the serious nature of this crime. Greyhounds can experience both physical and mental long-term suffering from being given prohibited substances.

### **Recommendation**

There must be maximum penalties given to those industry participants who have been found to have given prohibited substances to dogs.

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

No comment

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

GWIC is the industry regulator and is responsible for ensuring that industry participants abide by industry regulations and legislation. It is therefore imperative that GWIC is and acts as an independent body. It is inappropriate that greyhound industry participants can disrupt, influence or undermine the actions of GWIC. There is a direct conflict of interest between Greyhound Racing NSW and its industry participants who can influence GWIC, particularly under the current funding model.

To ensure the best interests and welfare of greyhounds and also the integrity of GWIC as viewed by the public GWIC needs to be totally independent from industry participants and GNSW and the funding of GWIC needs to reflect that.

**Recommendation**

GWIC must not be influenced by GNSW and must be a fully independent regulatory body and operate solely to develop policies and procedures for greyhound welfare. GNSW must be banned from giving any influence or direction to GWIC regarding policies and procedures.

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

The Greyhound Industry Reform Panel made the recommendations “that the commercial and regulatory functions for the industry should be separated and vested in two different entities” and “that a Greyhound Welfare and Integrity Commission (the integrity commission) should be established as an independent statutory corporation in legislation. The integrity commission should represent the State” and the NSW Government accepted these recommendations. Yet in this instance we have the commercial industry providing funding to the Government body. This demonstrates a lack of integrity of the integrity commission itself.

It is totally inappropriate that GNSW fund the GWIC when GWIC is responsible for monitoring the activities of industry participants represented by GNSW. Funding of the

industry regulator needs to be independent of the industry and should be fully funded by the Government. This funding should then be recouped by the Government via taxes on this gambling industry.

It is also totally inappropriate that the Government spends public money on propping up the gambling industry such as was the case when the Government gave \$500,000 towards prize money for the 2020 Million Dollar Chase. In this instance the trainer of the winning greyhound was labelled a “great ambassador for the industry” yet this same trainer has a lengthy history of serious animal welfare breaches including racing dogs with prohibited substances. As a taxpayer I find this abhorrent.

### **Recommendations:**

The funding model for GWIC needs to be changed so that it is totally and also adequately funded by the NSW Government. This funding needs to be permanent and secure and these funds should come from GNSW and the gambling industry via taxation.

The Government should not spend any public funds on propping up this gambling industry via GNSW.

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

GWIC currently has limited powers and insecure funding which means it cannot fulfill its intended role to the level expected by the NSW public or to be inline with the Government’s own commitments.

GWIC needs permanent and secure funding independent of this gambling industry.

GWIC also need to be given more powers. The Act does not allow GWIC to track all greyhounds bred into the industry for their whole of life. Recommendation 73 of the Greyhound Industry Reform Panel report states “A new greyhound racing register should be established and managed by the integrity commission to capture the identity and whereabouts of all greyhounds throughout their lifecycle. “ and this was accepted by the NSW Government. Currently GWIC are prevented from tracking ‘retired’ greyhounds. This is allowing thousands of greyhounds to be killed or to disappear each year without GWIC being able to track them. There also needs to be more inspectors to monitor and track dogs over their lifecycle.

GNSW has failed to act on the University of Technology Sydney (UTS) ‘Identifying Optimal Greyhound Track Design for Greyhound Safety and Welfare’ Report 2017, after their study on how to make greyhound tracks safer to reduce injuries and deaths on the track. This study identified that most track-related injuries and deaths occur on a bend and that 6 dog races are much safer than the current 8 dog races. GNSW are clearly demonstrating that they do not put a priority on safety and animal welfare as injuries and deaths continue to occur on round tracks and in 8 dog races.

In fact land has been purchased in Chinderah in the Tweed Shire in northern NSW where GNSW say they are building a ‘Centre of Excellence’ yet it was reported in local media that there were plans to build a round track at this so called ‘Centre of Excellence’. To say that GNSW cares about animal welfare and to be continuing to build new round tracks 3 years after the UTS report was released is the height of hypocrisy.

## **Recommendations**

GWIC needs increased, secure, independent and permanent funding to attain greyhound welfare and integrity in the greyhound racing industry.

GWIC should be given more powers and should be able to track all dogs born into the industry for their whole life.

More inspectors are needed.

Reducing track injuries and deaths needs to be made a priority and GWIC need to be responsible for setting minimum standards for track and training facility design and safety, in accordance with the UTS study ‘Identifying Optimal Greyhound Track Design for Greyhound Safety and Welfare’ Report 2017

GWIC should be responsible for licencing race tracks and training facilities and withdrawing licences for those tracks and training facilities that do not meet the standards.

GWIC should set maximum race field sizes

## **(TOR G) Any other related matter**

Every incident of animal cruelty within the industry must be reported. All persons involved in the industry or that have an association with facilities used by the industry who suspect or witness animal cruelty must be obliged to report it.

### **Recommendation:**

Introduce a mandatory reporting method for industry participants to report acts of suspected animal neglect or cruelty.

## **In conclusion**

Thousands of greyhounds going missing or killed from this gambling industry is not acceptable. The greyhound rehoming policy must be amended to prohibit the killing of healthy greyhounds, Welfare of greyhounds can only be assured if all dogs born into the industry are tracked and monitored for whole of life by GWIC and that all healthy greyhounds get to live out their natural lives in private homes or a sanctuary. There needs to be more inspectors and the number of dogs bred into the industry needs to be reduced. GWIC

must set the behavioural assessment standards used by GAP to assess greyhounds for rehoming.

Maximum penalties must be awarded to perpetrators who administer prohibited substances. GNSW must not be allowed to influence GWIC regarding policies and procedures. The funding model for GWIC must be changed so that GWIC is totally funded by the NSW Government with the Government recouping those funds from GNSW and the gambling industry via taxation. The Government should not be spending public funds on this gambling industry.

Race tracks and training facilities need to be made safer according to the UTS study to reduce injuries and deaths on track. GWIC must be given more powers to implement safety on tracks and setting minimum standards for track design. Industry participants must be obliged to report incidences of suspected animal cruelty.

I like many Australians, long for the time when all states of Australia recognise the sentience of animals and that it is unnecessary and indeed extremely selfish to use and abuse animals for profit and particularly in the name of gambling and therefore bans Greyhound Racing. But until that happens the welfare of these most gentle, affectionate and loyal dogs should be given the utmost priority. I believe that is only possible if GWIC is totally independent of the industry and are given sufficient funding and powers to implement the necessary changes. Thankyou for your time and efforts to improve the animal welfare for the thousands of greyhounds born into, used and trapped in this gambling industry.

Susie Header