

**INQUIRY INTO 2025 INQUIRY INTO THE OPERATION OF
THE APPROVED CHARITABLE ORGANISATIONS UNDER
THE PREVENTION OF CRUELTY TO ANIMALS ACT 1979**

Organisation: New South Wales Greyhound Breeders, Owners & Trainers
Association

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**Submission to the Inquiry into Charitable Organisations – Concerning the RSPCA
From: New South Wales Greyhound Breeders, Owners & Trainers Association (NSW
GBOTA)**

Introduction

The New South Wales Greyhound Breeders, Owners & Trainers Association (NSW GBOTA) welcomes the opportunity to provide this submission to the Inquiry into Charitable Organisations.

As the representative body for greyhound participants in New South Wales, the NSW GBOTA has a longstanding commitment to promoting animal welfare, compliance with industry regulation, and ensuring fairness in the treatment of participants across the racing sector.

It is from this perspective that we raise concerns regarding the Royal Society for the Prevention of Cruelty to Animals (RSPCA), and the appropriateness of its continued classification as a charitable organisation.

Concerns Regarding RSPCA’s Charitable Status

While the RSPCA is widely recognised by the public as an animal welfare body, we believe its current operations extend well beyond what is ordinarily understood as charitable in nature. Several key issues highlight why the continuation of charitable status is inappropriate:

1. Conflict of Interest and Enforcement Powers

- The RSPCA holds unique investigatory and enforcement powers under law, effectively operating in a quasi-regulatory capacity.
- Unlike other charities, this creates a dual role where the organisation acts as both advocate and prosecutor. This blurs the line between public service and private interest, particularly as prosecutions and



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enforcement outcomes contribute to the RSPCA's public profile and fundraising activities.

- In practice, the RSPCA has weaponised this privileged status to advance its advocacy campaigns and to position itself as the moral authority in matters where it is not an independent regulator.

2. Commercialisation of Activities

- The RSPCA has expanded into commercial endorsement schemes, most notably through its “RSPCA Approved” branding found on grocery store products such as chicken.
- This creates a two-tier system that disadvantages farmers and producers who are already adhering to best practice but are excluded from the marketing advantage of RSPCA endorsement.
- The scheme effectively rewards “inner circle” producers while penalising others through the perception that non-endorsed products are inferior or unethical.
- If the RSPCA genuinely believed that certain farming or production practices were unacceptable, it should have used its powers and influence to ensure those products were not available for sale at all. Instead, the organisation has chosen to commercialise its brand, monetise consumer sentiment, and reinforce its financial base—an activity more akin to corporate conduct than charitable purpose.
- This commercialisation, when coupled with the benefit of tax-deductible donations, creates an uneven playing field and raises grave concerns about fairness, transparency, and the misuse of charitable concessions.

3. Advocacy Beyond Charitable Purpose

- The RSPCA has increasingly moved into policy lobbying and campaigns designed to restrict or abolish lawful industries, such as greyhound racing.
- This lobbying often disregards or misrepresents the significant animal welfare reforms achieved by industries subject to government regulation.
- The use of tax-deductible donations for advocacy aimed at eliminating lawful participant livelihoods raises serious questions about whether this activity is consistent with charitable intent.



4. Use of Charitable Funds

- Transparency regarding how donations are applied is limited. A considerable proportion of funds is directed toward administrative overheads, legal costs, and advocacy campaigns, rather than frontline animal care.
- The public perception of a charity is that the majority of funds will be used directly for the welfare of animals. Evidence suggests this is not consistently the case.

Impact on Greyhound Participants

The NSW GBOTA's members, who are subject to stringent animal welfare and regulatory standards, are directly affected by the RSPCA's conduct. Our members uphold the welfare of their greyhounds through industry-mandated practices, transparency in animal care, and ongoing improvements in rehoming and post-racing welfare initiatives.

Despite this, the RSPCA has persistently campaigned to undermine the industry, disregarding the work of participants and government oversight. By weaponising its privileged charitable status, the organisation has been able to distort public debate, marginalise lawful participants, and use taxpayer-subsidised concessions to further its campaigns.

Recommendation

In light of the above, the NSW GBOTA submits that:

- The RSPCA's activities no longer align with the ordinary understanding of a charitable purpose.
- Its dual role as both an advocacy organisation and prosecutorial authority is inconsistent with public expectations of an impartial charity.





ADVOCACY

- Its commercialisation of the “RSPCA Approved” brand highlights a drift toward corporate practice, using charitable concessions to support activities that generate private advantage for select producers while disadvantaging others.
- Consideration should therefore be given to removing or restricting the RSPCA’s charitable status, or alternatively, imposing stricter conditions to ensure that charitable concessions are not used to fund lobbying, commercial endorsement schemes, or enforcement activities that exceed the public benefit test.

Conclusion

The NSW GBOTA does not dispute the importance of animal welfare. However, we believe that the RSPCA’s current operations extend far beyond the scope of what should be supported by taxpayer-subsidised charitable status. Its weaponisation of privileged status, combined with its commercialisation of animal welfare endorsement schemes, creates unfairness for lawful industries and raises grave concerns about the misuse of public trust.

We respectfully urge the Inquiry to recognise these issues and recommend reform to ensure that charitable status is preserved for organisations whose activities remain squarely within the boundaries of direct benevolence and service to the community.

Submitted by:

New South Wales Greyhound Breeders, Owners & Trainers Association (NSW GBOTA)

Regards,

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