

16 June 2015

The Secretary  
Joint Select Committee on Greyhound Racing in Tasmania  
Parliament House  
HOBART TAS 7000

**By Email:** [stephanie.hesford@parliament.tas.gov.au](mailto:stephanie.hesford@parliament.tas.gov.au)

Dear Secretary,

***Animals Australia Submission to the Inquiry into Greyhound Racing in Tasmania***

Thank you for the opportunity to provide a submission regarding greyhound racing in Tasmania.

As you may be aware, Animals Australia is a peak animal protection organisation in Australia. On behalf of our member societies and individual members and supporters we are pleased to be able to provide you with this submission.

This submission provides a factual account and our informed view regarding the welfare, regulatory and integrity issues in the greyhound racing industry in Tasmania. As you will read, while it is illegal live baiting practices (in other States) that have sparked this Inquiry, there are a number of significant issues that equally require consideration when determining the future of greyhound racing in Tasmania – not the least of which is the likely live baiting practices in Tasmania and the accepted industry practice of killing hundreds of healthy dogs each year simply because they are deemed to be of no economic value.

The current regulatory framework for greyhound racing is being reviewed in all States, and in most it has been found to be ineffective, untenably conflicted and fails to ensure that the industry is compliant with all racing, animal welfare and legal obligations. We note and welcome that (at least) in Tasmania there is a separation between the integrity services (vested in the Director of Racing - DOR) and the administration and promotion of the 'sport' (undertaken by Tasracing). We were also pleased that a Review was recently conducted by the Chief Veterinary Officer and the DOR; we address the recommendations of that Review later in this submission.

It is our great concern, however, that irrespective of any new level of oversight, various illegal practices such as live baiting and doping - motivated by and designed to gain a winning advantage - will continue. The fact that significant numbers of trainers in the industry nationally have shown a willingness to engage in illegal activities in the past, regardless of the immoral as well as criminal nature of these activities, underpins this concern. In our view, it is highly likely that rather than cease, trainers will simply become more imaginative and careful to ensure that practices are not detected.

Regardless, many in the community would see the killing of so many healthy dogs each year as reason enough for the industry to be phased out. Such a phase-out could be implemented through a moratorium on the breeding of further greyhounds. Given what is now known about this industry, including the scale of cruelty and level of industry knowledge of abhorrent practices, it is our belief that it is unlikely to be able to operate in a way that gives appropriate consideration to the welfare of animals and meets community expectations. The information provided in our submission supports this position.

If this Inquiry concludes that the industry should be allowed to continue, then Animals Australia has detailed in this submission, steps that should be immediately taken to address overbreeding and wastage.

Please contact me if you require further information or explanation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Glenys Oogjes', is displayed on a light grey rectangular background.

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***Animals Australia Submission to the  
Joint Select Committee on Greyhound Racing in Tasmania***

June, 2015

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**(A) Practices in the Tasmanian greyhound racing industry, including whether live baiting, 'wastage' and 'draining' of greyhounds is occurring, and if so, to what extent.**

## **A1 OVERBREEDING AND 'WASTAGE'**

### **A1.1 Summary**

On a national basis, from available industry figures, we estimate that of the ~20,000 greyhound puppies born each year in Australia<sup>i</sup>, only around 2,000 (or ~10%) will live a full life span. The greyhound racing industry in Tasmania is relatively small in comparison to Queensland, NSW and Victoria, but it is still estimated that some **400** greyhounds (from unwanted pups to retired racers and breeders) are killed each year in Tasmania.

Nationally, some 60% of greyhound puppies will be registered to race (GRV FOI provided 'Destination Reports'<sup>ii</sup> for all States & GRV to Q 9013 by Greens 2012<sup>iii</sup>). The others (~ 8,000 pups) are unaccounted for, and almost all of these unwanted pups will be 'euthanised'. Some industry statements refer misleadingly to a 'named' figure and percentage, but in fact many hundreds of dogs are 'named' each year but do not go on to race.<sup>iv</sup>

Greyhound racing careers are quite short – 1 to 2 years. They commence racing in their 2<sup>nd</sup> - 3<sup>rd</sup> year and most retire between the ages of 2 - 4 years.<sup>v</sup> Approximately 12,000 greyhounds are 'retired' from racing (at just 2 - 4 years old) each year in Australia, but only 10 - 15% of those dogs will go on to breeding or be rehomed, with the rest being killed.

Even breeding greyhounds are likely to be killed at ~5 to 6 years of age. Brood bitches (and a few sires) will usually have a short life post-racing. That is, the brood bitches will spend a couple of years racing and then a couple of years having around 3 - 4 litters of pups, meaning the dogs will live to 5 or 6 years of age (GA's new breeding standards confirm few breed over 6 years of age).<sup>vi</sup>

Industry data leads to the estimate that only some 10% of pups born each year are destined to live out a natural life span; that is, just some 2,000 dogs born each year will survive long term. The only dogs to live a full life span will be the Greyhound Adoption Program (GAP) dogs,<sup>vii</sup> those adopted out by the greyhound rescue groups and a few dogs that live out their life with the small scale (hobby) trainers.

Despite this high level of 'wastage', in each State there are greyhound 'breeding incentive' schemes. In Tasmania it has taken the form of a 'Tasbred' scheme which adds to prize money for Tasmanian bred dogs in races run in Tasmania and a 'Breeders Bonus' for each litter whelped in the State (Note: a recommendation by the CVO and DOR is commented upon later in this submission). Further, racing greyhounds that are not placed in a race will be paid an appearance or starters fee to encourage breeders and owners to continue in the sport; this is believed to be the case in Tasmania (approximately \$10 a starter).

Note also that under national (GA) Rules, the number of pups whelped is **self-reported** by the breeder (within 14 days of whelping, by submitted form), and 'registration' of the litter occurs between 10 and 16 weeks of age, (inspected usually with prior notice), thus the numbers whelped may be under-reported (and the number killed higher).

**A mechanism to enhance confidence in regard to the number of dogs born each year (and thus track them) is required; for example, through required ultrasound and/or veterinary certification of the outcome of the pregnancy and pups born.**

## A1.2 Tasmania

To provide a snapshot, in 2012 some 517 greyhound pups were reported whelped in Tasmania and 468 of those were subsequently registered.<sup>viii</sup> Only 218 of those pups (or 42%) born in 2012 were subsequently raced. Some 299 pups did not make it to the race track (and the figures range between 200 – 300 in prior years).

It is reported that there are 799 dogs racing/in training in Tasmania at present.<sup>ix</sup> The dogs race for approximately 2 years, and so an estimated 680 retiring racers will be killed in Tasmania over a couple of years, as (nationally) it is usual for only some 10 – 15% of retiring dogs to go into breeding (for a few more years) or be ‘re-homed’.

There is a very low GAP adoption rate. That is, in 2011/12, only 54 dogs were adopted via GAP Tasmania<sup>x</sup>, though rising to 62 in 2013/14. **It is likely that in any year the number of pups killed and retiring racers killed would together mean over 500 healthy dogs are killed in Tasmania each year.** This estimate is clearly close to the mark as the CVO/DOR report indicates that reported statistics show that ‘*in the 2013/14 racing season...486 were euthanized...28 deceased, [and] 121 retired/rehomed...’*, but goes on to say that ‘*these should be viewed as minimum figures*’ pending a full audit of all Tasmanian kennels.

## A1.3 Greyhound Adoption Program (GAP)

Only a relatively small number of ex-racing dogs are re-homed by state-based GAPs. As indicated above, in Tasmania, that equates to only 54 over 2 years (2011 and 2012), rising to some 62 dogs in the 2013/14 racing season and 53 rehomed by GAP Tasmania in the period August 2014 to March 2015. [It is acknowledged that around the same number are privately rehomed, or taken in by rescue groups, particularly Brightside Sanctuary].

We welcome the likely transfer of resources to GAP in Tasmania to lift its capacity, but caution that finding sufficient appropriate adoptive homes for greyhounds will remain challenging. These are long-lived dogs (up to 15 years) and opportunities for appropriate homes will diminish if hundreds more are offered each year (rather than be euthanased).

Further, there is significant concern that the manner in which racing greyhounds are raised, housed and trained (see below) - often without adequate socialisation - makes their adjustment to life as a pet (and their ‘re-training’) particularly difficult. The cost of re-training and adjusting ex-racing dogs to domestic life is high – with conservative estimates being around \$3,000 per dog.<sup>xi</sup>

**Whilst the aim of the GAPs across Australia is laudable and supported, the industry often also seeks to ‘use’ GAP to provide a positive image of the industry, despite the very limited number of dogs adopted, and the associated ‘cover-up’ in a public sense of the many dogs that are killed.**

## A1.4 Breeding Incentive Schemes

Despite the ethical issue of the breeding of thousands of dogs each year that will never race, greyhound breeding incentive schemes have operated in each State. The schemes aim to encourage breeding of greyhounds and racing by awarding bonuses (for racing wins) to those locally (State) bred dogs who participate in races in their birth State; seemingly to ensure the viability and prosperity of the sport.

In most States, it costs owners/trainers to enter the schemes, but the bonuses paid (on top of usual prize money) can be high.

**These incentives to breed are in stark contrast to industry statements about regulating and controlling breeding to reduce the breeding of excess pups (that never race).**

Greyhound Australasia's (GA) new breeding standards, which will commence in July 2015, state:

*The industry's National Greyhound Welfare Strategy was approved by the GA Board in May 2014. Amongst its objectives are better protection of the welfare of our industry's breeding animals, and **reducing the number of greyhounds bred that are unlikely to be suited to racing.***<sup>xii</sup>

The new GA breeding code fact sheet<sup>xiii</sup> states that one of its key aims is 'reducing the number of pups born that have very limited chances of ever racing'. However, the new GA Breeding Standard proposed is unlikely to make any significant dent in current high breeding rates.

The changes include that a greyhound bitch: must be registered before being bred the first time; will not be permitted to have litters over 8 years (unless vet checked); cannot have more than 3 litters unless a National Breeding Panel considers and allows a 4<sup>th</sup> or subsequent litter; and can only have 2 litters in 18 months.<sup>xiv</sup>

However, GA (industry) statistical information shows that these changes will have little impact on breeding; very few bitches have litters after 7 years of age, only 13.5% of bitches have a 4<sup>th</sup> litter, and less than 6% have a 5<sup>th</sup> or additional litters. Regardless, the Breeding Panel may well allow further litters.<sup>xv</sup>

**It follows, then, that the breeder incentive schemes (added to lucrative prize money and even starters fees/appearance money) nullify any such attempt to introduce more responsible breeding practices.**

***A1.4.1 Tasmania's Breeders Incentive Schemes – Tasbred and breeder rebates***

Breeding pup numbers and racing figures appear steady in Tasmania – some 600 pups whelped each year and of those pups only a little over half usually go on to race (That is: 2008 52.7%; 2009 51.4%; 2010 52%; 2011 62.3%; and 2012 42.2% raced).

Until recently, breeders were rewarded by a \$1,300.00 per litter 'Breeders Bonus', more recently called a Vaccination/Microchip/Rearing Rebate, and with a Racing Services Tasmania budget for 2014/15 of \$130,000.00. A rebate for the DNA testing of female breeders was also paid.

**We welcome the CVO/DOR recommendation, and subsequent Tasracing acceptance, that these bonuses be scrapped as they provided a clear conflict in regard to the need to reduce irresponsible breeding.**

However, it appears that the TasBred bonuses continue and were not the subject of recommendations by the CVO/DOR review. The TasBred bonuses are paid in addition to existing prize money for Tasmanian bred greyhounds who win races in Tasmania, including the 'Breeders Classic Series' of races – with a combined budget/payout for 2014/15 in excess of \$150,000.

**These additional bonuses serve to provide further incentive for the breeding of greyhounds. Such incentives are also in conflict with responsible breeding initiatives, and are unethical in the face of the hundreds of dogs that are currently euthanased in Tasmania each year.**

### **A1.5 Recommendations to end overbreeding and ‘wastage’**

It is a more than reasonable expectation that the greyhound racing industry takes responsibility for every dog it breeds and every dog retired from racing.

It is unsustainable and unethical for dogs to continue to be bred and killed in such numbers.

**Animals Australia recommends the following measures be implemented to address the unacceptable number of young and healthy dogs killed by the greyhound racing industry each year:**

1. All greyhound breeding incentive schemes to be cancelled immediately, including the TasBred scheme.
2. All racing greyhounds must be retired into a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs) within three years of the commencement of their racing life.
3. Similar to schemes whereby a percentage of poker machine revenue is allocated to problem gambling programs - on an ongoing basis, no less than a 1% subsidy from wagering must be allocated to the rehabilitation/rehoming of greyhounds into a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs). This includes: retired greyhounds; greyhounds bred for racing that do not qualify for a racing career; and greyhound pups unwanted for racing.
4. A mandatory ‘retirement fee/levy’ to be made payable by greyhound breeders: calculated on a per litter basis. The revenue raised will be allocated to the rehabilitation/rehoming of all greyhounds, as described in condition 3 above. [As foreshadowed in the Queensland Commissioner review, a refund system could apply where a licenced owner is able to privately and satisfactorily re-home a retiring greyhound, and thus not call upon the funds accumulated from the retirement fee/levy].
5. All pups born that are unwanted for greyhound racing must be rehomed into a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs). The greyhound regulatory bodies must consider this requirement and provide a solution to implementing this requirement – as part of this term. For example, by requiring the results of mandatory ultrasounds of all pregnant breeding dogs at the time that they are vet-checked to be lodged with the racing bodies, and which will be checked against the actual litter size. Any stillbirths or deaths must then be certified from an authorised independent veterinarian in order to account for all puppies born, and ensure they are tracked from ‘cradle to grave’.
6. All female breeding greyhounds must be desexed, rehabilitated and rehomed to a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs) after a maximum of three litters.
7. All male breeding dogs (studs) must be desexed, rehabilitated and rehomed to a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs) after a maximum of three years.

## A2 WELFARE ISSUES

### A2.1 Statistics – injuries and deaths

Stewards' reports from each State racing authority show that on a **national** basis:

- 4 to 5 dogs on average every week are killed on the race track at official meetings.
- Up to 200 dogs will be injured each week during these races.
- Many thousands of dogs are 'scratched' each year before races due to injury.

In Tasmania, the Stewards reports show similarly that the sport causes a worrying rate of injuries and deaths.

**Injuries:** In 2012, 468 dogs were injured at meets, in 2013 some 310 injured in 9 months (Jan-Sept), and in 2014 almost 300 were injured (including hypoxia and cramp figures)<sup>xvi</sup>. Steward's reports for the first 4 months of 2015 recorded 196 injuries at race meetings in Tasmania. The CVO/DOR report indicates that in 2014 those injury rates equate to an injury at half the meetings held each year.

**Deaths:** Stewards reports from 2012 to 2014 were examined and found 17 dogs died at meets in 2012, 20 during the 9 months of records in 2013 (Oct-Dec unavailable), 14 died in 2014, and records to April 2015 show 6 dogs died in those 4 months at Tasmanian greyhound race meets.

*Please note that the injuries do not include 'scratchings' before the race due to injury or the dogs that were vetted after the race.*

### A2.2 Racing risks

**Injuries and deaths could be significantly reduced by installing straight tracks (or at least no 'turn starts' when the bend is too soon after the start) and/or reducing the number of dogs in races to avoid collisions (the primary cause of injuries). An industry commentator suggests only 4 dogs racing at high speed can safely round a bend.**<sup>xvii</sup>

There has been considerable research to determine the risk factors facing racing greyhounds. One USA study by *Sicard et al* (1999)<sup>xviii</sup> found that race speed, race distance and track design is associated with higher orthopaedic injuries to greyhounds. The tracks with the shorter initial straightaway (before the turn), decreased turning radius (tighter), and increased turn bank cause higher injuries.

The ongoing pressure on the bodies of racing dogs running on a circular track has also been investigated in Australia. A recent finding by *Cave*<sup>xix</sup> showed that bone 'remodelling' occurred when the body lays down more bone after stress fractures. *Cave* believes that a contributing factor to this is the dogs running fast around anti-clockwise tracks, as it places much more pressure on the left hand side of bodies/muscles/bones. The study found that it is in this area where the majority of bone remodelling occurs (asymmetrically).

There are few straight tracks in Australia and the industry does not appear to be acting on these findings. It is noted that the CVO/DOR report indicated it could not undertake a detailed review on these matters given the timeframe, but these statistics indicate reform is sorely needed whilst ever greyhound racing continues.

### Over-racing

Racing frequency schedules for dogs are not regulated in Codes or in the racing industry Rules. 'Over racing' of greyhounds occurs in the industry and is prompted by the often high stakes offered.

A recent industry commentator noted that stewards rarely take action even in extreme cases. Stewards did recently request an explanation from a trainer in Victoria<sup>xx</sup> whose dog, *Dyna Malaise*, had run 5 races in 12 days. The trainer advised the stewards he then intended to 'kennel' the dog for a week, and no further action was taken. Similarly a dog called *Harrier Bale* (a maiden) had 12 races between January 15 and March 13 2015 - an average of 4.8 days between each race, but it was only when the dog raced three times in five days that the stewards noticed.<sup>xxi</sup> Both these dogs were owned by the same person, but there is no rule against running dogs this often.

**Greyhound veterinarians have suggested a 7 day break between each race would be acceptable. An enforceable national rule is required to ensure dogs are not over-raced and that stewards consistently apply such a safeguard.**

### Heat stress

In Australia, it is concerning that dogs being transported to and from tracks and during racing may experience high temperatures that will affect their welfare. *Jane McNicoll* studied temperature environments in transport trailers and examined individual greyhound temperature at racing tracks in South Australia. In 2012, *McNicoll* reported the results to the Greyhound Veterinary Association. *McNicoll* concluded that '*transporting dogs in standard trailers [without air conditioning] in ambient temperatures >33°C may challenge dogs' homeothermy and transporting dogs at such temperatures, before or after strenuous exercise may pose a significant risk of initiating heat illness*'.<sup>xxii</sup>

The RST approach to extreme weather is in the form of a general warning:

*4.3.2. Extreme Weather - Common sense should be used when racing in extreme weather. Provision should be made to cool animals quickly after racing in hot and/or humid conditions.*

And in regard to Transport:

*2.5. Greyhounds must be protected from extremes of temperature and must be provided with adequate light and ventilation.*<sup>xxiii</sup>

The RST 'Hot Weather' policy (GPOL0023) states in part:

*Applications for scratchings without penalty due to the heat will only be approved if the official Bureau of Meteorology predicted temperature is 30° Celsius or above at the venue where the meeting is to be conducted and the journey required for reaching the track exceeds eighty kilometres one way...*

*If the temperature at the venue reaches 33° Celsius during the course of the meeting, the Stewards may abandon the race meeting.*

**Unfortunately the policy provides no surety that if temperatures of 33 degrees or higher are predicted or measured that the stewards will take action.** Whilst Tasmania is not likely to have very hot weather regularly, unlike other States there is no definitive temperature at which a race meeting (and thus the risky transport to that meeting, particularly without air conditioned trailers) will be called off. There is no rule therefore to protect all greyhounds from high temperatures (>33 degrees) which may seriously affect their health and welfare. **An upper limit must be set.**

### A2.3 Killing methods for unwanted greyhounds

Each of the State racing authorities recommend euthanasia by veterinarians – but do not require it.

The RST policy on euthanasia (GPOL0011) similarly merely indicates that:

*The only acceptable method of euthanasia for racing and retired greyhounds is by an intravenous lethal injection of Pentobarbitone.*

*No other method of euthanasia is condoned.*

There is no national or local Rule that requires euthanasia be conducted in this manner

**Leading Sydney greyhound vet, Ted Humphries, admits he puts down an average of four greyhounds a week. He says he 'despises doing it, but is afraid that if he doesn't humanely euthanise them, then they'll be inhumanely disposed of via blunt force trauma, shooting, gassing, hanging or drowning'.<sup>xxiv</sup>**

Stories of greyhounds being killed inhumanely are often reported, but their frequency is unknown. Very young pups are likely to be drowned (anecdotally reported) or bludgeoned to death, whereas sub-adult or adult dogs may be shot on properties.

In terms of disposal, tip-offs received by Animals Australia and other animal protection organisations provide that greyhound properties will usually have a pit to dispose of dogs. Further, the recent ABC *Four Corners* report included a trainer (at the trial track of Tom Noble) in Queensland describing how a hole-digging machine (typically used to dig for fence posts) was used to make a pit for dead greyhounds.

In recent months (since the *Four Corners* program) pits filled with dead greyhounds have been found by authorities in NSW, and discarded dogs that were shot in a bush area near Bundaberg Queensland was reported and the greyhound owners charged.

**To improve welfare and confidence in the treatment of 'unwanted' greyhounds, it is clear that greyhounds that are to be retired but cannot be rehomed must (in future) be killed only by a veterinary surgeon (lethal barbiturate overdose). To ensure this, every notification of the death or retirement of a registered greyhound would need to be accompanied by a veterinary certificate, or a GAP or other adoption papers (respectively).**

### A2.4 Doping

Doping of animals is a widespread issue within the greyhound racing industry as indicated by numerous charges and suspensions across Australia, including of some top trainers. In Tasmania recently (May 2015), RST suspended longtime trainer Gerard 'Bear' Allford until the end of 2018 for administering 'speed' to his dog *Jadie Bear* in January prior to a race<sup>xxv</sup>.

The administration of drugs such as amphetamines, methamphetamines and its metabolites to dogs extends beyond a breach of the Greyhound Racing Rules. Such practices breach animal welfare legislation in each State, as they expose the affected dogs to animal welfare and health risks. Further, the possession of such drugs is an offence under criminal law and prohibited drugs legislation.

Greyhounds frequently test positive for drugs such as cocaine, EPO, amphetamines, caffeine, anabolic steroids and Viagra, which are administered in an attempt to make the greyhound perform at a faster rate.<sup>xxvi</sup>

An ABC 7.30 *Report* investigation in 2013 reported that although approximately half of all dogs that tested positive for banned substances were in NSW, the 'doping issue' is clearly a national issue affecting the industry.<sup>xxvii</sup> Further, it has been reported that 80 per cent of greyhound trainers consider providing some sort of illegal substance to dope their dogs.<sup>xxviii</sup>

Current regulatory oversight is doing nothing to deter this behaviour. This is further evidenced by the fact that in January 2015, a dog trained by Victoria's number 1 trainer, Jenny Hunt – the step-daughter of suspended Hall of Fame trainer Graeme Bate – tested positive to amphetamines and methamphetamines. This trainer earned well over 1 million dollars in prize money last year. In WA, Linda Britton, of the famous Victorian greyhound dynasty, was named 'Trainer of the Year', despite being suspended for 18 months for drugging offences.

## A2.5 Live baiting

Investigations conducted by Animals Australia and Animal Liberation Queensland reveal that **live baiting is an accepted and routine training method** for a significant number of greyhound trainers.

Our investigations implicated over 70 individuals across Victoria, New South Wales and Queensland - including trainers and their employees - directly engaging in this illegal practice. Further, the investigation documented that twice this number were present at tracks where live baiting is conducted.

The evidence showed live piglets, possums and rabbits being tied to mechanical lures and flung around race tracks at high speed while being pursued and mauled by dogs. Injured animals were not put down by trainers, and instead, they continued using them for further training until the animal eventually died from their injuries.

Live rabbits were also tied to leashes and used to stimulate dogs in the lead up to race days, with the dogs being encouraged to attack the animals.

Subsequent investigations undertaken in Queensland, NSW and Victoria by other agencies have continued to find further evidence of live baiting since that time. Reports of the practice have been handed down over the past two weeks.

In Queensland, Commissioner MacSporran in his report of 1 June 2015 concluded<sup>xxix</sup>:

*Although the general tenor of the information provided to me contains little by way of evidence that the practice of live baiting is widespread in the industry, it would be naïve in the extreme, to conclude that the practice is not widespread.*

In Victoria, two reports were delivered to the Government in the past week. The report by the Racing Integrity Commissioner Sal Perna (June 2015) concluded in part on this matter<sup>xxx</sup>:

*There is no direct evidence as to how regular and widespread the practice of live baiting is/was. Accordingly, while I cannot make a finding of fact that live baiting has been occurring on a systemic basis, I am confident in my view that the practice is unlikely to be confined to one property or one group of participants in Victoria.*

*The overwhelming circumstantial evidence indicates that the live baiting has been an ongoing practice used at various stages in Greyhound racing.*

*... I am satisfied the information received by my office during the course of this Inquiry indicates that live baiting is well-known and occurs within the Greyhound racing industry in Victoria.*

**An anecdote:** on ABC Talkback radio in Melbourne (ABC 774) on the evening of 11 June 2015, the RIC Sal Perna had just completed an interview speaking of his report (released that day) indicating he had 'no evidence' that Greyhound Racing Victoria (GRV) staff were aware of the widespread nature of live baiting, and thereby had not actively pursued it. An ex-greyhound owner – Matt from Anakie (an area west of Melbourne where a large number of greyhound premises are located) – called to challenge Mr Perna's belief that GRV were likely unaware, and in so doing advised he was in the industry until 5 years ago, owned approximately 20 greyhounds over a period of 10 years, and knew that each of them was 'broken in' using live baiting.

The second Victorian report, from the Chief Veterinary Officer (Dr Milne), acknowledged reports of live baiting in Victoria, stating<sup>xxxi</sup>:

*Reports of live baiting have fundamentally undermined public confidence in the current system of animal welfare regulation in the greyhound industry. Live baiting is illegal and is widely understood within the industry to be so. A key question for this Review is why these illegal activities were not discovered by the regulatory authorities and enforcement action undertaken.*

**That report then proceeds to recommend a raft of legislative and organisational changes to assist governance, compliance and enforcement in an attempt to reduce the occurrence of live baiting in the future. Its recommendations are commended to this review.**

In Tasmania, the CVO/DOR report panel concluded similarly, that whilst no evidence of live baiting had been identified 'that could result in a prosecution' it went on to find that:

*'...this finding does not exclude the possibility that live baiting could be happening in Tasmania. The Panel reached this view as, in the absence of any credible intelligence to enable the regulator to be in a position to observe the activity at the time it is occurring, the likelihood of obtaining sufficient evidence to support a prosecution of live baiting is extremely remote'.*

This conclusion and observation in regard to the difficulty of detecting and obtaining evidence is echoed by the other State inquiries that have reported their findings recently. These findings acknowledge again the undercover surveillance methods used by Animals Australia and Animal Liberation Queensland which led to the first systematic exposure of the practice.

The suffering of animals used in live baiting is extreme - both in terms of associated terror and the direct physical trauma suffered through being mauled. Evidence gathered in the recent investigations should only be considered as a 'snapshot' of the likely extent of live baiting nationally.

The sheer number of people present during these activities (in the material gathered by Animals Australia and Animal Liberation Queensland), and the numerous 'tip-offs' received by Animals Australia, RSPCAs and other authorities since the *Four Corners* program aired, make it abundantly clear that there is widespread industry knowledge and acceptance of live baiting within the greyhound racing industry in Australia.

In addition to the scenario at private training tracks where Animals Australia and Animal Liberation Queensland were able to obtain evidence of live baiting using bull rings/lures, reliable information has been received of the informal practice of providing live small animals into enclosures with quite young dogs (even pups) in order to excite their interest at an early age. Similarly even at the private training facilities (with bull rings), an additional practice was recorded of a small animal (rabbit) on a leash being used to taunt dogs, and then be permitted to maul the live animal – a practice that doesn't require infrastructure.

Animals Australia has also been advised from several industry sources that dogs that are being prepared for a particular race will routinely be ‘freshened’ up by being subjected to a live bait training session a day or two prior (and direct evidence of this timing was gathered in Victoria and provided to authorities). A further practice described to Animals Australia includes stopping the vehicle on the side of the road on the way to a race meeting and providing a live animal (usually a rabbit) to the dogs – intended to increase their prey drive prior to arrival at the track.

**It is these virtually undetectable instances that may well continue whilst greyhound racing and the owner/trainers incentive to win races inevitably continues. A crackdown on training premises will be welcome, but authorities in Tasmania and elsewhere should be under no illusion that this will be enough to stamp out live baiting.**

An insular culture within the industry has been noted by several reviewers, and it is therefore not clear whether the recent exposés have to this point penetrated to some in the industry. An example of this was that despite the coverage and knowledge of numerous charges, suspension of owners, trainers and the seizure of dogs in Queensland from February 2015, in May the joint Queensland Police and RSPCA Taskforce charged two further men with live baiting<sup>xxxii</sup>, this time including the use of kittens, including occurring up until May 2015 despite a high level of known scrutiny of the industry.

This issue of culture, and whether it is likely to change is key. This is particularly so as the CVO/DOR noted a number of demographic factors that may impede such change in Tasmania, including an average age of trainers at 57 and that most have been involved for decades and may be schooled in entrenched past practices. Their report concluded in March:

*Ultimately, while Government and regulators have a significant role, the future of the greyhound industry will primarily rely on the will of its participants to develop a culture where the community can be confident that animal welfare standards meet contemporary expectations.*

It should be noted in this regard that the national Greyhound industry Rules amended in April 2015 mandate that licensed persons must attempt (if present) to prevent any instance of live baiting (or a greyhound attacking any animals) or risk a 10 year ban, and mandates that persons report any instance of live baiting that they witness at risk of a 5 year ban.<sup>xxxiii</sup> The adoption of the national GA Rules would go some way towards changing the culture, but of course only if detection of these practices occur, penalties are imposed, and thus an example is made of those who offend.

#### **A2.5.1 Legislation**

The evidence in three States showed serious breaches of state-based animal welfare legislation and criminal codes, as well as relevant legislation protecting wildlife in each State. **We welcome the CVO/DOR recommendation that live baiting be treated as ‘aggravated cruelty’ under the Tasmanian Animal Welfare Act 1993 (and understand an AWAC-recommended definition amendment is needed).**

**In addition to live baiting being illegal, in most States it is also illegal to have live small animals on a property that is used for training greyhounds. As stated above, we welcome the recommendation by the CVO/DOR report that this be introduced in Tasmania. There are also industry rules prohibiting live baiting, including a newly imposed penalty in Tasmania of a minimum 10 year ban on a person contravening the new lure rules, and in addition a fine.**<sup>xxxiv</sup>

Despite existing laws and regulations, mounting investigations and prosecutions has been near impossible, as the RSPCA explained to the NSW Select Parliamentary Inquiry into the greyhound industry in 2013/14.<sup>xxxv</sup> One key challenge is that training and ‘breaking’ of greyhounds also occurs on private premises and even random inspections may be unlikely to happen upon an offence occurring, even if prevalent (see above discussion in regard to nefarious practices).

Greyhound Australasia has introduced new national industry rules to ‘*mandate the use of artificial or synthetic lures, at any place or time in the training, education or preparation to race of any greyhound*’.<sup>xxxvi</sup> This move follows similar Rules introduced by Victoria and Queensland since the airing of the *Four Corners* program and thus outlawing the use of even dead animals/carcases/animal parts to train and trial greyhounds.

We understand that in Tasmania animal carcasses were already banned and dried animals skins were then banned (from 20/2/2015) after the *Four Corners* program. **We would recommend to reduce any confusion that RST should also ban the use of tanned sheepskin on lures.**

## A2.6 Greyhound industry animal welfare initiatives

Greyhounds Australasia (GA) has a comprehensive statement on its website setting out the changes made over recent years in acknowledgment of the greater community concern about their sport.<sup>xxxvii</sup> Each state racing authority has similar material – though in most cases (other than GRV and GRNSW) it is comprised primarily of details of their industry adoption programs (GAPs) and minimal Codes of practice.

In May 2014, GA adopted a national animal welfare strategy<sup>xxxviii</sup> (similar had been jointly developed by GRV and GRNSW in February 2014). Key elements of the Strategy are as follows<sup>xxxix</sup>:

- Higher levels of education for trainers and breeders including a requirement for all new participants to be assessed on core competencies before obtaining or upgrading a licence.
- Tighter breeding regulation controls and the promotion of more responsible breeding practices.
- A requirement for all greyhounds to be under the care of a registered participant at all times during their lifecycle, unless retired as a pet.
- Improved inspection and compliance requirements on greyhound properties.
- A star rating system to be introduced for all greyhound facilities at which greyhounds are housed during their lifecycle.
- A tiered trainer licence system which will stipulate how many greyhounds a trainer can train.
- Ongoing enhancements to each of the state’s Greyhound Adoption Programs to maximise the rehoming opportunities for retired greyhounds.

A Greyhound Welfare Working Party was appointed to oversee the implementation of the strategy. In July 2014, a new Chair of the Working Party was appointed – ‘*prominent greyhound administrator, owner and breeder Mr Steve Hawkins*’.<sup>xl</sup>

Mr Hawkins resigned as Deputy Chair of the Queensland Greyhound Racing Board in early April 2015,<sup>xli</sup> but media reports at that time were not fully aware of the circumstances. The Queensland Commission of inquiry documents that Mr Hawkins advised Qld Racing CEO Darren Condon soon after the *Four Corners* program that he had been aware of live baiting of possums but not pigs, and that the

CEO advised the Board members.<sup>xlii</sup> An investigation into Mr Hawkins was instigated after an anonymous complaint about him (the nature of which is unknown).

Animals Australia has previously indicated its concern that this person was from the industry rather than being an independent person. There has been no public statement in regard to Mr Hawkins' position as Chair of the national Greyhound Welfare Working Party – but there can be little public confidence in this body at the current time.

Previously, several GA initiatives under the welfare strategy were released for comment (until 15 January 2015), with a view to being introduced on 1/7/2015. The Rule changes related to this are set out,<sup>xliii</sup> and so far include new Breeding Rules<sup>xliiv</sup> and a new Vaccination Requirement.<sup>xliv</sup> The vaccination issue is primarily a health issue, and would bring industry practices into line with State dog boarding and other codes – the primary change is requiring vaccinations go from the current C3 to C5 vaccination (increased protection). The breeding changes proposed are very disappointing for the reasons set out in C1 below.

The GA Strategy sets out the basic needs of greyhounds and condemns live baiting and the export of greyhounds to countries without sufficient animal welfare regulations and other matters.

In response, RSPCA Australia indicated the GA Welfare Strategy has considerable flaws<sup>xlvi</sup>:

*The strategy does not address the key welfare issues associated with current breeding, rearing, kennelling and training practices. The strategy should directly acknowledge and address the lack of socialisation, environmental enrichment, human handling and habituation inherent in current practices. Significant changes to the way in which greyhounds are bred, reared, trained and housed must occur to improve welfare and performance and hence reduce wastage, overbreeding and euthanasia.*

RSPCA's response regarding the welfare needs of greyhounds at all life stages in more detail was provided to the NSW enquiry<sup>xlvii</sup>. We understand these criticisms remain unaddressed.

## **A2.7 Codes of Practice**

Most greyhounds lead a life of deprivation. When they are not racing, they are kept in small pens lacking stimulation and socialisation. Greyhounds are no different to any other dog. They want to play, to be part of a family, to give and receive attention and affection like any other dog.

The State greyhound authorities have a number of welfare codes, though most have been developed 'in-house' without government or animal welfare organisation input. They are for the main part, not legally enforceable and instead provide guidance to minimum expected standards.

The code for greyhound establishments in Victoria is enforceable under the *Domestic Animals Act 1994*, and since 2010, GRV has required compliance with minimum standards under their own industry rules, and serious offences can attract de-registration of trainers/owners.<sup>xlviii</sup> In most other States this is not the case.

It is understood from the CVO/DOR report that because the Tasracing Standards for the Care of Greyhounds are said to be consistent with the recently developed Tasmanian Standards and Guidelines for the welfare of dogs in breeding and boarding kennels, greyhound premises will be exempt from that State-enforced set of Standards once they are introduced (i.e. licenced person will be bound instead by the industry Rules). We are not in a position to fully compare the two documents.

**However, most of the greyhounds housing codes in Australia (whether enforceable or not) in regard to housing and socialisation, enrichment and exercise, provide a very minimum standard of care.**

For example, most codes only require exercise outside small kennels (2.4 – 3sqm) of 2 periods of 10 minutes a day. Others allow walking machines or rotary walkers which pose significant welfare risks to the dogs.

The Tasmanian Code is no different – with the minimum kennel area for racing or spelling dogs of just 3sqm and only 2 exercise periods of 10 minutes each day.

Significant concern also arises with regard to the raising of greyhound pups at some rearing properties, as dogs live in large barren runs or paddocks (with several other litter mates) with little enrichment, socialisation or handling until they go into training in their second year. The TasRacing document relating to the care of greyhounds at the various life stages<sup>xlix</sup> merely advises that pups (from 12 weeks to racing age) be given a paddock or yard to run in with litter mates and sufficient food, water and parasite control.

Some recently reported studies indicate significant concern for the welfare and performance of the dogs as a result of such minimal methods of raising pups, in addition to the kennel environment and husbandry of adult dogs in the industry. For example, *Dr Karen Dawson* writes that paddock rearing of young greyhounds increases their fear issues, with the stress of subsequent kennelling not often observable. That is, sometimes the ‘good’ dogs that have no behavioural signs are the ‘ones suffering the most’.<sup>l</sup> Dr Dawson advises that the fear issues occur in the young dogs due to a lack of social attachment, the novel environment, and because they have no control over their environment, which is also often noisy.

Fear in dogs can be avoided or reduced by socialisation and habituation. Dr Dawson uses the example of military dogs and guide dog programs which rely heavily on puppy walkers to raise dogs for their role in the community. **She describes the paddock raising of greyhound pups akin to breeding and rearing them as commercial, ‘even wild’ animals, and at odds with then expecting them to be companion animals.** Dr Dawson concludes that the prevalence of fear in many greyhounds has a severe effect on the ability to rehome them at a later time.

*Dr Peter Yore*, in his 2012 research regarding the ‘all too common event’ of kidney issues (which cause pain and reduced performance) in Australian racing greyhounds,<sup>li</sup> provides further insight into the inadequate environment of racing kennels. He advised that factors which may lead to kidney problems include the stress of kennelling, the long periods of kennelling, low frequency of dogs being let out to urinate (inadequate flushing), strenuous exercise, large muscle mass, high protein diets (meaning the kidneys having to work harder to remove waste) and hypertension.

## **(B) The role of regulatory authorities in upholding animal welfare standards in the industry and encouraging best practice.**

### **B1 REGULATION AND INSPECTION OF TRAINERS PREMISES**

Australia's greyhound racing industry is largely self-regulated with peak industry bodies governing the rules of racing. Nationally, there is minimal government oversight. A racing review in Victoria in 2008<sup>lii</sup> found links to criminal activity and noted the conflict of interest, whereby the State controlling body responsible for the promotion and operation of the industry was also responsible for integrity assurances.

It is clear that in Victoria, NSW and Queensland (where the largest greyhound industries operate) that this will change due to the revelations of the Animals Australia/Animal Liberation Queensland investigations and the subsequent ABC *Four Corners* program and then extensive inquiries (the NSW one still underway). In fact, the entire governing racing Boards in those States have either been sacked or have resigned in the past 3 months.

It is fortunate and welcome that in Tasmania there is a clear separation of the commercial and integrity functions in regard to oversight and regulation. Regardless, it seems apparent (from the CVO/DOR report) that the inspection of licenced person's premises has been dramatically increased this year because of the revelations of live baiting in other States, and presumably means it was not given sufficient weight previously.

**Animals Australia welcomes the strong recommendation in the CVO/DOR report that national Greyhound industry Rules (GARs) be adopted and have precedence over the Local Rules. If this was to occur, a number of the other recommendations would automatically be covered – e.g. in the context of inspections, the GARs amendments adopted in April 2015 in regard to trainers premises provide that even the discovery of any small animals (or parts of animals) that may be used for live baiting at a greyhound premises would be an offence.**<sup>liii</sup>

**A full review of the Act must be undertaken to assist the detection of illegal activities and to strengthen the current laws in relation to these matters.**

### **B2 APPEARANCE and PRIZE MONEY**

Greyhound owners and trainers are financially assisted through the payment of fees for a dog entering a race. This payment is usually paid in cash before they start a race and is sometimes referred to as 'petrol money'. The starters fees vary from relatively low per race in Tasmania (\$10) and South Australia, to a usual \$50 to \$100, and higher, for some big races. Like other incentives, it appears that such subsidisation (whilst aimed at enlivening the racing industry) may also keep otherwise unsustainable greyhound owners and trainers in the industry, thereby propping up participants without the means to adequately cover the costs of their activity. It seems reasonable to therefore query whether they have the means to properly care for all the dogs they have.

In regard to prize money, successful trainers and breeders can earn well in excess of \$1 million each year. Feature races now routinely offer more than \$350,000 to the winning dog. Typical first-place prize money for a novice dog is \$5000 at city tracks. If the dog shows potential, it graduates to Group

3 races (prize money of about \$25,000), Group 2 races (prize money of \$30,000 to \$70,000), then for elite performers, Group 1 feature races.

In Tasmania, whilst prize money per race is not usually as high, stake money has climbed steadily and Greyhound Australasia reports that stake money paid in Tasmania rose from \$1.8M in 2003 to almost \$4M in 2013. Over the same period the number of starters, meetings and races held was steady.

Such rewards, with the added bonuses of TasBred, provides significant incentive for breeders/owners to breed high numbers of dogs and to seek any advantages available – legal or otherwise, including live baiting. This was discussed in regard to incentives to breed above.

### **B3 RACING INTEGRITY**

There is little doubt that significant prize money and financial incentives on offer in combination with minimal regulatory oversight has led to trainers engaging in illegal practices to gain a winning advantage.

As briefly discussed earlier, Victoria's leading trainer, Jenny Hunt (the daughter of suspended Hall of Fame trainer Graeme Bates), last month had a greyhound test positive to amphetamines and methamphetamines. This trainer earned well over \$1 million in prize money last year. In WA, Linda Britton, of the famous Victorian greyhound training family dynasty, was named 'Trainer of the Year', despite being suspended for 18 months for drugging offences. She was not permitted to attend the function to receive the top accolade of the industry, but it was awarded to her nonetheless.

Three of the greyhounds nominated in Victoria's Greyhound of the Year awards which were to be held on Friday 20<sup>th</sup> February 2014 (but were cancelled), were trained by a leading trainer implicated in live baiting offences, Darren McDonald. Last year's NSW Trainer of the Year uses the services of a NSW 'breaker' implicated in live baiting offences and now suspended.

Leading veterinarians have indicated their concern that the use of drugs and other substances to alter the performance of racing greyhounds may have grave health consequences for the dogs to which they are administered.

All of these serious and real factors serve not only to undermine the integrity of the races, but result in serious animal cruelty.

**(C) The level of state government funding provided to the industry in Tasmania in the form of a 20 year funding deed signed in 2009.**

## **C1 GOVERNMENT FUNDING**

State governments across Australia provide millions of dollars each year to the greyhound racing industry – actively encouraging growth and participation through breeding incentives, appearance fees, infrastructure and race-day attraction grants and even prize money.

In Tasmania, this is in a form of some \$27M per annum over all three Codes (Greyhounds, Thoroughbred and Harness Racing) for operational costs.

The CVO/DOR has, rightly in our view, addressed the conflicts of interest that arise from an animal welfare perspective. Specific incentive issues have been addressed earlier in this submission.

**What is clear is that a greater portion of this funding must be contributed to ensuring the integrity and animal welfare outcomes and less on incentive to breed more dogs and win races, whilst ever greyhound racing continues in Tasmania.**

**(D) The comprehensive report already completed by the Director of Racing and the Chief Veterinary Officer into these issues and the 29 recommendations for consideration by the State Government.**

## **D1 RESPONSE to TAS. DOR/CVO RECOMMENDATIONS**

A full listing of all 29 recommendations made in this Report in March 2015 is provided in a tabled summary **Appendix 1** of this submission, which includes comments provided by Animals Australia.

That table also lists relevant (not all) recommendations from the recently tabled Queensland Inquiry by Mr Alan MacSporran QC<sup>iv</sup>, and the two Victorian Inquiry reports tabled in June 2015 – one by the Victorian Racing Integrity Commissioner<sup>lv</sup>, and the other by the Victorian Chief Veterinary Officer<sup>lvi</sup>.

Animals Australia supports the DOR/CVO report's view that where possible a consistent approach to industry welfare and integrity issues should be adopted, and thus see this comparison of recommendations as key to the Committee's considerations.

**Overall, we welcome all the changes recommended by the DOR/CVO report, though maintain even these changes will be insufficient to adequately alter the culture of the greyhound industry. In our view, the industry is unlikely to change (for reasons acknowledged in the DOR/CVO report) and we therefore hold grave fears for the ongoing welfare of greyhounds (and other animals) in the industry, and again reiterate that it should not continue. With this caveat we make comment on the recommendations.**

It is recognised that in Tasmania the integrity and the commercial functions of the industry regulation are separate. As such, some of the key recommendations in the Queensland and Victorian reports are not relevant here (and so do not appear in the table in Appendix 1).

**The following points (the Rec number refers to the DOR/CVO report) are made in addition to and to strengthen the recommendations of the DOR/CVO report (as identified and explained in the table we provide at Appendix 1):**

- Rec 2 – the welfare and fate of any greyhounds of a disqualified person must also be protected.
- Rec 5 - the regulation of bull rings alone will not sufficiently protect small animals from live baiting as it occurs in many different premises. The Qld report makes stronger recommendations to ensure the trainers and owners pre-advise of the date/time/premises to be used for all breaking, training or trialling.
- Rec 9 – Qld recommendations include a detailed approach to funding rehoming, including high pup registration fees to cover the eventual cost of rehoming, with refunds available if this occurs privately.
- Rec 10 – strongly support the need for national Greyhound Australasia Rules (GAR) to override local industry Rules (where GAR sets a higher standard).
- Rec 11 & 12 – current recommendations are insufficient to reduce breeding rates – the Committee must take further measure.
- Rec 13 & 14– the scrapping of the ‘breeder/litter bonus payment is welcomed, but the TasBred breeder incentive scheme (prize bonuses) must be scrapped (as has occurred in Queensland).
- Rec 17 – Welcome training – but Codes and training program must significantly improve dog housing, handling and socialisation. A full review is needed.
- Rec 19 – additional integrity measures are needed to independently verify the number of pups born rather than breeders self-reporting, and thus pups perhaps being disposed of prior to the ID visit several months later.
- Rec 20 & 21– all bullrings, training track, and breaking in, pre training and trialling only be permitted in the presence of a registered track operator.
- Rec 22 – in addition to recommended extra integrity staff, Qld have recommended the secondment of police officers to bring extra investigative and surveillance skills to the team.
- Further – as in the GAR and recommended in other States – only synthetic/artificial lures should be used – i.e. not as permitted in Tasmania, sheep skin/wool.
- Further – as in GAR, mandatory reporting of *prima facie* live baiting to the industry body, and as in the VIC recommendations, also mandatory reporting of any cruelty to State authorities (RSPCA/Police, etc) is warranted.
- Further – a Qld recommendation for licensed person to keep a log book of all aspects of their activities to assist inspections and cross checking,
- Further – Vic and Qld recommendations to include further independence in racing boards and bodies and to include a person with animal welfare experience on the Boards and Appeals Boards.

## (E) Any other matters incidental thereto.

### E1 GREYHOUND RACING INTERNATIONALLY, EXPORTS

**An industry in decline:** Australia is one of only eight countries in the world with a commercial greyhound racing industry – Australia's is by far the biggest. The number of greyhounds registered to race in Australia has been declining since 2004 and this downward trend is mirrored worldwide. In the USA, greyhound racing is now illegal in 39 states, 28 of the 49 tracks have closed in the last decade and wagering has dramatically reduced.

**Export of Australian greyhounds:** Unfortunately there are several Asian countries (in particular) where there is an appetite particularly for the growth in gambling and thus greyhound racing. Several hundred greyhounds are exported each year from Australia to these countries which do not have adequate conditions of housing, racing or rehoming. Greyhounds have regularly been exported to racing facilities in Macau (including via Hong Kong), Vietnam and China (despite gambling being illegal in China).

In March 2013, GA decreed that it would suspend issue of Passports for dogs to be exported to Macau whilst it investigated concerns raised by animal advocates. Then in June 2014 Greyhounds Australasia released its report on exports<sup>lvii</sup> and determined that GA does not support export to countries that do not have good animal welfare laws, and GA will not issue 'passports' to those dogs that may be exported to such places – they included Macau (and thus Hong Kong), China and Vietnam (which failed to respond to the GA assessment request).

GA CEO Scott Parker (June 2014) said this of the new Policy/Rules (and the previous suspension of dogs to Macau)<sup>lviii</sup>:

*"Our biggest challenge is that, despite the industry's rule that registered participants must obtain a GA issued passport before export, GA cannot control the destination of Australian greyhound exports. ...*

*"GA condemns the mistreatment of greyhounds by any individual anywhere, at any time. The conduct of this review and the implementation of the report's recommendations will enhance GA's efforts to protect greyhound welfare across the world," Mr Parker said.*

GA rule 124 (1) has (since 2010) made the obtaining of a GA-issued passport a mandatory pre-requisite to export greyhounds, and thus the export to non-compliant countries an offence. Despite the clear ban on the issuing of passport for several countries by GA, exports have continued. Department of Agriculture official export figures for 2014 (obtained under FOI) show that 50 dogs were exported to China, 72 dogs to Hong Kong and 260 dogs went to Macau that year.

To date on the public record we are only aware of a single (Queensland) trainer who has been sanctioned for exporting greyhounds without a 'passport' to Macau in 2014. That is, trainer Ian Hoggan was fined just \$1,000.<sup>lix</sup>

Federal legislation is needed to definitively stop greyhound exports to countries without adequate animal welfare standards and laws.

However, this issue demonstrates yet again that greyhound owners and breeders will not comply with voluntary guidelines or the directives of industry leaders. Regardless, as a minimum, it is another reason why the national industry rules should be adopted and prevail over the Tasmanian local Rules.

We commend this submission to you.

## REFERENCES

See pages 36 - 40.

## Appendix 1: Comparison of Tas CVO/DOR recommendations and those of Vic and/or Qld

- Tasmania - Final Report (13 March 2015) by the Tasmanian Chief Veterinary Officer, Biosecurity Tasmania & the Director of Racing, Racing Services Tasmania, *Review of Arrangements for Animal Welfare in the Tasmanian Greyhound Racing Industry*.  
[http://www.racing.tas.gov.au/\\_data/assets/pdf\\_file/0007/104785/Final\\_Report\\_-\\_Review\\_of\\_Arrangements\\_for\\_Animal\\_Welfare\\_in\\_the\\_Tasmanian\\_Greyhound\\_Racing\\_Industry\\_13\\_March\\_2015.pdf](http://www.racing.tas.gov.au/_data/assets/pdf_file/0007/104785/Final_Report_-_Review_of_Arrangements_for_Animal_Welfare_in_the_Tasmanian_Greyhound_Racing_Industry_13_March_2015.pdf)
- Queensland – Final Report (1 June 2015) by Alan MacSporran QC, *Queensland Greyhound Racing Industry Commission of Inquiry*.  
<http://www.greyhoundreview.qld.gov.au/pdf/final-report-1-june-2015.pdf>
- Victoria – Final Report by Sal Perna, Racing Integrity Commissioner (RIC) – 2015, *Own Motion Inquiry into Live Baiting in Greyhound Racing in Victoria*.  
<https://assets.justice.vic.gov.au/ric/resources/b08942c3-590c-432f-b7c9-ddcb037e639b/2015+own+motion+report+into+live+baiting+in+greyhound+racing+in+victoria.pdf>
- Victoria – Final Report (published 11 June 2015) by Chief Veterinary Officer (CVO) Charles Milne, *DEDJTR investigation into animal welfare and cruelty in the Victorian greyhound industry final report*. [http://economicdevelopment.vic.gov.au/\\_data/assets/pdf\\_file/0018/1108026/20150611\\_DEDJTR\\_Greyhound-report\\_FINAL.pdf](http://economicdevelopment.vic.gov.au/_data/assets/pdf_file/0018/1108026/20150611_DEDJTR_Greyhound-report_FINAL.pdf)

Tasmanian CVO/DOR Report, March 2015	Qld additional /relevant recommendations	VIC additional/relevant recommendations	Animals Australia comment – <i>Note: Animals Australia (AA) is opposed to greyhound racing, but comments below are provided in the event it is permitted to continue</i>
<b>5.1 Live Baiting</b>			
1. Create a mandatory penalty under the Rules of Racing that any person found guilty of live baiting is disqualified from the industry for life.		Vic - Perna, Rec 9 & 10 recommending reciprocal relationships between the cruelty act and Rules of Racing penalties, including high sanctions to act as a deterrent.	AA – Fully support the need for a mandatory disqualification for life (it is merely 10 years in the GAR and some other States).

		<p>Vic – Milne, Rec 1.7 – details strengthening POCTA to increase live baiting offences and enforceability (and below). Live baiting should be treated as ‘aggravated cruelty’ and higher penalties apply.</p> <p>Vic – Milne, Rec 1.7 - also to make it an offence to be present then live baiting is occurring.</p> <p>Vic – Milne, Rec 1.8 the POCTA statute of limitation be extended to 3 years for these offences.</p>	
2. Create a rule which imposes a penalty not only on the person found guilty of live baiting, but also on any greyhound in the person’s care and control.	Qld MacSporran – Rec 9, provision to be made in the Rules for the greyhounds of a disqualified person have their welfare provided for, including to prevent the dog being disposed of, and the owner/industry to pay for the dog’s rehoming or other suitable transfer.	<p>Vic – Perna, Rec 5 - detailed Rule changes needed to ensure the greyhounds of disqualified person are not transferred to others without permission, and then not to relatives, not be kept on the same premises etc.</p> <p>Vic- Milne, Rec 4.11 similar.</p>	AA – agree, but with the proviso as detailed by the Qld recommendations regarding the welfare and fate of the dog.
3. Create an offence under the Rules of Racing for a person to keep or house on a property used for training or educating greyhounds, any small animals that could be used for live baiting.		<p>Vic – Milne, Rec 1.7 – suggests this offence under the POCTA laws.</p> <p>Vic – Milne, Rec 4.11 similar.</p>	AA- GAR (Greyhound Australasia Rules) has already incorporated this, and it must now be adopted by each State - including in welfare legislation.

4. Create an offence under the Rules of Racing for a person to have on a property used for training or educating greyhounds any device for the trapping of small animals.			AA – Agree, and this should also be incorporated into animal welfare laws.
5. Only permit the use of bullrings by a registered person who is in charge of the property on which the bullring is located and only permit greyhounds trained by that person to utilise the facility	Qld MacSporran – Rec 13 – goes further in that any person proposing to break-in, pre-train, train or trial greyhounds must advise (and a Stat Dec) the date, time and place. The owner must also co-sign the declaration.		AA - supports the <b>stronger Qld recommendation</b> as small animals can be used on any premises, not only in a bull ring or at a trial track (see submission re baiting of pups, providing small animals in various situations).
6. Investigate the construction of bullrings on registered trial tracks under the control of Tasracing, with 24/7 CCTV monitoring which is only available to Racing Services Tasmania stewards or RSPCA officers (if this recommendation is adopted, consider the banning of all private bullrings).	See above.		AA – support if greyhound racing continues.
<b>5.2 Lifespan of a Greyhound</b>			
7. Ensure races are programmed specifically for greyhounds with less ability and for mature age greyhounds	Qld MacSporran Rec 11 – agreed.		AA – Agreed, though ensuring they are fit to race.

8. Ensure that the Grading Schedule provides further racing opportunities for greyhounds that are no longer competitive in their current grade.	Qld MacSporran Rec 11 – agreed.		AA – Agreed, as above.
9. An assessment be made of funding and opportunities for greyhounds to be rehomed once they have completed their racing careers	Qld MacSporran, Rec 10 – registration fees for pups be set at a level to include funds to provide for the future welfare of the dog, with a refund feature if the dog is eventually proven to be rehomed by the current owner.	<p>Vic – Milne, Rec 4.4 – a review be conducted of financial and other incentives to develop options to reduce breeding and improve rehoming rates or better post-racing outcomes.</p> <p>Vic – Milne, Rec 5.1 - national approach to rigorous reporting of retirement, export and receipt of notifications/offences for non-lodgement. And 5.2 that GA co-ordinate collection of data.</p> <p>Vic- Milne, Rec 2.5 – greater powers in regard to enquiring into the disposal or euthanasia of dogs, including the power to direct an autopsy occur to understand the ‘end of life outcomes’.</p>	<p>AA – the <b>Qld recommendations</b> (see final report) indicate a detailed approach to provide funding and incentives to pay the costs of rehoming.</p> <p>Caveat – increased rehoming efforts will ultimately fail unless breeding rates are significantly reduced. The Tasmanian community cannot absorb hundreds of long-lived adult dogs each year. These ‘retiring’ greyhounds will also displace other homeless dogs awaiting adoption in pounds and shelters, and ultimately transferring the euthanasia of greyhounds to other dogs.</p>
<b>5.3 Welfare Legislation, Rules</b>			
10. A review of the interaction between national and local rules be undertaken, noting that national rules should prevail over any local rules and that a harmonised national approach should be adopted.			AA – strongly agreed. The GAR should be seen as a minimum, and Local laws must only be used if they provide a <u>higher</u> standard.

11. Ensure breeding rules and policies are supported and informed by detailed statistical data and education.			AA – it should be noted (see submission) that the GA Breeding Standard (to be introduced in July 2015) will <u>not</u> make any significant dent on current breeding rates – evident by its own industry survey and data.
12. Regularly assess breeding rules and policies to ensure they are consistent and compliant with animal welfare legislation and contemporary animal welfare standards.		Vic – Milne, Rec 1.6 that penalties under Local Rules be reviewed and revised to make them consistent with community expectations.	AA – current overbreeding and animal husbandry standards in the industry fall far short of community standards.
<b>5.4 Conflict between Policies</b>			
13. Ensure incentives to breed are properly balanced with responsible breeding and welfare considerations.		Vic – Milne, Rec 4.4 – a review be conducted of financial and other incentives to develop options to reduce breeding and improve rehoming rates or better post-racing outcomes.	AA – in addition to the discontinuance of the Tas ‘breeder bonus’, the TasBred prize bonuses should also be discontinued.  In addition – see Rec 9 above - registration fees up front should be high to cover eventual rehoming costs.
14. Transfer current funding allocated to a Vaccination, Microchipping and Rearing Rebate (formerly referred to as a breeder’s bonus) to retirement and rehoming opportunities for greyhounds.	Qld MacSporran – Rec 8 – the discontinuance of the breeding incentive program QGreys.		AA – in addition to the discontinuance of the Tas ‘breeder bonus’, the TasBred prize bonuses should also be discontinued.

<b>5.5 Adequacy of Powers</b>			
15. Enhance the powers of entry for animal welfare officers under the <i>Animal Welfare Act 1993</i> , and Racing Services Tasmania stewards under the Rules of Racing, to ensure they are properly supported with respect to live baiting and other animal welfare issues.	Qld MacSporren – similar, see Para 52(ii).	Vic – Milne, Rec 2.3 to remove restrictions on the hours racing officers can attend a premises to inspect.  Rec 2.4 – more rigorous investigation of complaints and surveillance.	AA – agreed.
16. Consider an amendment to the <i>Racing Regulation Act 2004</i> to enable stewards to require unlicensed persons to appear before inquiries and provide documents if it can reasonably be determined that the person is of particular interest to an inquiry under the Rules of Racing.			AA- agreed.
<b>5.6 Education, Training and Competencies</b>			
17. Implement an industry education program with respect to contemporary animal welfare standards.	Qld MacSporran, Rec 11 to improve information on the need to socialise greyhound pups.	Vic – Milne, Rec 1.1 a review and upgrade of the Code of Practice. (Rec 1.2, 1.3, 1.4 relate to local legislation to require these standards be complied with).	AA – agreed, but this should be comprehensive (including the need for socialisation of dogs), and be a mandatory requirement for continued licensing of all persons involved with greyhounds.

		Rec 1.5 that GRV educate its member about compliance with council laws.	
18. Link licensing requirements to attendance and assessment at education programs in respect of animal welfare standards.	Qld MacSporran, Rec 11 similarly ties licensing to completion of training.	Vic – Milne, Rec 4.6 requires enhanced training and regular assessment of skills.	AA – agreed.
<b>5.7 Compliance Programs</b>			
19. Create a rule of racing that at all times (from whelping onwards) a greyhound must be in the possession of, and under the ownership, care and control of a licensed person.	Qld MacSporren – Rec 4 (para 53) that pups traced from registration at ear branding, microchipping.  Qld MacSporren – Rec 5 (para 54) to make records of individual greyhounds available publicly on request/fee.	Vic – Milne, Rec 5.4 that greyhounds only be kept at registered premise and in the custody of licenced persons.	AA – This needs to occur with an integrity officer/veterinarian <u>attending</u> to attest to the number of pups whelped as close as possible to the whelping, e.g. within 3 days (to prevent disposal prior to ID at ~10 weeks).
20. Establish a requirement that all bullrings and training tracks on properties used for the training and education of greyhounds are registered by the Director of Racing.	See Tas 5 above and the stronger Qld recommendation.  Qld MacSporran, Rec 15 – breaking in, pre-training, training, and trialling <u>only</u> be permitted at registered track and in the presence of a registered track operator.	Vic Perna, Rec 2 – a regulatory framework for <u>all premises and participants</u> involved in rearing, education, breaking and training of greyhounds.	AA – this needs to be much stronger to ensure all breaking and training is overseen by an independent inspector.

21. Establish a process of inspection and audit of properties that have a bullring and/or training track on the property.			AA – as above, blanket coverage is required, at all times.
22. Consider the employment of a Racing Integrity Manager and an additional Steward Investigator to support the Director of Racing and enhance the delivery of integrity and animal welfare objectives.	Qld MacSporran recommends (para 45d) seconded police be part of the statutory integrity authority.	Vic – Milne, Rec 4.9- that GRV develop a compliance strategy in consultation with all agencies. Inspections and enforcement action to be reported to the RIC and a summary published annually. Vic – Milne, Recs 5.7 – 5.9 - relating to effectiveness of enforcement. 5.10 re GRV reporting to Ministers on performance in regard to greyhound welfare.	AA – support for the Qld model whereby serving police are seconded to the Integrity team to provide skills and greater resources.
23. Review security and surveillance protocols and practices in place at all Tasracing-controlled racing and trialling venues.			AA- agreed, on the assumption they will then be upgraded.
<b>5.10 Practices and Procedures</b>			
24. Make it a requirement that any greyhound that travels interstate whilst still under the care and control of a Tasmanian licensed person must be notified in advance to stewards (except in the case of a greyhound travelling to fulfil an interstate racing commitment).			AA – agreed – the principle being that greyhound whereabouts are known at all times.

<b>5.12 Reporting</b>			
25. Establish a central point of contact, that being the RSPCA, for persons with information in relation to live baiting or any greyhound animal welfare complaints. The contact details of the RSPCA to be included on all greyhound-related published documents.			AA – agreed.
<b>5.13 Communication</b>			
26. Establish formal Memoranda of Understanding between Racing Services Tasmania, the RSPCA and Tasmania Police for the exchange of information.	Qld MacSporran – similar, para 52 (iii).	Vic Perna, Rec 6, similar.  Vic Perna, Rec 7, recommending a ‘Law Enforcement Liaison Officer’ to coordinate and also assist interagency training.  Vic – Milne, Rec 4.7 – a formal referral method and protocol for breaches of laws.	AA – agreed – see the Victorian recommendations for further surety in regard to communication.
27. Consider the establishment of an independent, national animal welfare taskforce to consider jurisdictional findings and to make joint recommendations to state and territory Racing Ministers and Greyhounds Australasia.		Vic Perna, Rec 14, that State integrity boards meet to review findings of the various current reviews, and adopt a co-ordinated approach to integrity and welfare matters.	AA – agree with a national oversight of standard and integrity services. But warn that if this results in a ‘lowest common denominator’ set of standards then the industry will further undermine community support.

		<p>Vic – Milne, Rec 4.12. A national discussion to create harmonisation.</p> <p>Vic – Milne, Rec 5.6 – GA report all penalties issued by each State body.</p>	
<b>6.3 Governance Arrangements</b>			
<p>28. Consider the development of an appropriate formal arrangement between the Racing Services Tasmania division of the Department of State Growth and the Biosecurity Tasmania division of the Department of Primary Industries, Parks, Water and Environment.</p>		<p>Vic – Milne, Rec 3.1 - the audit and inspection functions to be removed from GVR and located in an independent agency or 'Inspectorate'.</p> <p>Recommendations 3.1 – 3.8 relate to the various functions of this independent body.</p>	AA supports this.
<p>29. Rebrand Racing Services Tasmania to the Office of Racing Integrity to emphasise its role and differentiate from the commercial body, Tasracing.</p>			

	Interstate recommendations not covered by the Tasmanian CVO/DOR Report - <b>Qld</b>	Interstate recommendations not covered by the Tasmanian CVO/DOR Report - <b>Victoria</b>	
		<p>Vic - Perna, Rec 4 – ban on any lures other than synthetic or artificial materials.</p> <p>Vic – Milne, Rec 4/11 - similar</p>	AA – we also oppose tanned skins or sheep wool.
		Vic - Perna, Rec 11 – requiring mandatory reporting of prima facie offences to law enforcement bodies (Police & RSPCA).	GA Rules require mandatory reporting to the industry body, AA believes the Perna requirement is justified – mandatory reporting to authorities - should be adopted (in addition to the national Rules).
	Qld MacSporran – Rec 6 – provide a publicly available database of injuries and deaths, including if it occurs after race day.	<p>Vic – Perna, Rec 15 relates to a secure database to provide full functionality.</p> <p>Vic – Milne, Rec 5.5 GRV monitor injuries (races and trials) and publish information annually.</p>	AA – support this streamlining of the gathering of data and its publication.
	Qld MacSporren – Rec 14 – licensees to maintain an official log book containing full details of all notifiable activities they are engaged in (breeding, training, ids, injuries etc). Log books to be available for inspection at any time by stewards.		AA – strong support to assist with inspections and auditing and inculcating a culture of accountability with industry participants.

	<p>Qld- MacSporran – Rec 2 – That an All-Codes Board be established, consisting of 7 members, four of which are entirely independent to the racing industry (during their term, and for 2 years prior))</p>	<p>Vic – Perna, Rec 13, that the GRV Board include a person with a background in animal welfare (and similar on the horse racing Boards).</p> <p>Vic – Milne, Rec 4.2 similar.</p> <p>Vic – Milne, Rec 4.13, that the Racing Appeals and Disciplinary board include and independent member with animal welfare experience.</p>	<p>AA – supports the inclusion of further independence and persons with animal welfare experience and skills.</p>
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<sup>i</sup> <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/111> (Estimate based on litters registered – some 2,707 in 2013 by some 7-8 pups/litter).

<sup>ii</sup> Greyhound Racing Victoria provided under FOI on 6/2/15 Destination report data for 2008-2014 for NSW, Qld, SA, WA, Tas. Vic data is still the subject of FOI review. Answers to Victorian Greens Q 9013 in 2012 to the Victorian Parliament provided Victorian data.

<sup>iii</sup> <http://vicmps.greens.org.au/content/q-9013-racing-greyhound-racing-victoria-%E2%80%94-animal-welfare>.

<sup>iv</sup> [http://www.abc.net.au/reslib/201502/r1389469\\_19745650.pdf](http://www.abc.net.au/reslib/201502/r1389469_19745650.pdf) RV response to 4Corners 12 February 2015 – advised 66% of pups born in 2012 were ‘named’, but the question related to those that had raced, and that figure for 2012 was 55% - from GRV-supplied ‘Destination Reports’.

<sup>v</sup> <http://vicmps.greens.org.au/content/q-9013-racing-greyhound-racing-victoria-%E2%80%94-animal-welfare>.

<sup>vi</sup> See the GA Breeding Standards explanatory notes, which show that very few bitches have more than 3 litters. <http://www.grv.org.au/wp-content/uploads/2014/12/Participant-Feedback-Form-National-Greyhound-Welfare-Strategy.pdf>.

<sup>vii</sup> GRV provided under FOI on 6/2/15 Destination report data for 2008-2014 for NSW, Qld, SA, WA, Tas.

<sup>viii</sup> Greyhound Racing Victoria provided under FOI to ALQ (February 2015), Destination report data for 2008-2014 for NSW, Qld, SA, WA, Tas, Vic, NZ.

<sup>ix</sup> [http://www.racing.tas.gov.au/\\_\\_data/assets/pdf\\_file/0007/104785/Final\\_Report\\_-\\_Review\\_of\\_Arrangements\\_for\\_Animal\\_Welfare\\_in\\_the\\_Tasmanian\\_Greyhound\\_Racing\\_Industry\\_13\\_March\\_2015.pdf](http://www.racing.tas.gov.au/__data/assets/pdf_file/0007/104785/Final_Report_-_Review_of_Arrangements_for_Animal_Welfare_in_the_Tasmanian_Greyhound_Racing_Industry_13_March_2015.pdf).

<sup>x</sup> Answer to ABC *Four Corners* Feb 2015.

<sup>xi</sup> [http://www.parliament.nsw.gov.au/Prod/Parlment/committee.nsf/0/7dee7c8f22acc503ca257c92001a6b72/\\$FILE/130206%20Greenhounds%20and%20other%20non%20GAP%20programs\\_Dr%20Karen%20Cunnington.PDF](http://www.parliament.nsw.gov.au/Prod/Parlment/committee.nsf/0/7dee7c8f22acc503ca257c92001a6b72/$FILE/130206%20Greenhounds%20and%20other%20non%20GAP%20programs_Dr%20Karen%20Cunnington.PDF).

<sup>xii</sup> <http://www.grv.org.au/wp-content/uploads/2014/12/Participant-Feedback-Form-National-Greyhound-Welfare-Strategy.pdf>.

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- <sup>xiii</sup> <http://www.grv.org.au/wp-content/uploads/2014/12/Fact-Sheet-Breeding-Overall.pdf>.
- <sup>xiv</sup> <http://www.grv.org.au/wp-content/uploads/2014/12/Participant-Feedback-Form-National-Greyhound-Welfare-Strategy.pdf>.
- <sup>xv</sup> <http://www.grv.org.au/wp-content/uploads/2014/12/Participant-Feedback-Form-National-Greyhound-Welfare-Strategy.pdf>.
- <sup>xvi</sup> [http://www.racing.tas.gov.au/\\_data/assets/pdf\\_file/0007/104785/Final\\_Report\\_-\\_Review\\_of\\_Arrangements\\_for\\_Animal\\_Welfare\\_in\\_the\\_Tasmanian\\_Greyhound\\_Racing\\_Industry\\_13\\_March\\_2015.pdf](http://www.racing.tas.gov.au/_data/assets/pdf_file/0007/104785/Final_Report_-_Review_of_Arrangements_for_Animal_Welfare_in_the_Tasmanian_Greyhound_Racing_Industry_13_March_2015.pdf).
- <sup>xvii</sup> See: <http://www.australianracinggreyhound.com/australian-greyhound-racing/administration/its-time-in-fact-its-overdue-that-bend-starts-should-go/60840>.
- <sup>xviii</sup> G.K. Sicard, K. Short and P.A. Manley; A Survey of injuries at five greyhound racing tracks. *Journal of Small Animal Practice* (1999) 40, 428-432.
- <sup>xix</sup> Cave, N. Bone remodeling in racing Greyhounds. *Proceedings of the Australian Greyhound Veterinarians Annual Conference, 2012*.
- <sup>xx</sup> <http://www.australianracinggreyhound.com/australian-greyhound-racing/administration/stewards-on-the-march/61959>.
- <sup>xxi</sup> McNicholl, J. Heat stress in Greyhounds in South Australia, *Proceedings of the Australian Greyhound Veterinarians Annual Conference, 2012*.
- <sup>xxiii</sup> *The Animal Welfare Manual* (2015)  
[http://www.racing.tas.gov.au/\\_data/assets/pdf\\_file/0010/105499/Greyhound\\_Animal\\_Welfare\\_Manual\\_30\\_April\\_2015.pdf](http://www.racing.tas.gov.au/_data/assets/pdf_file/0010/105499/Greyhound_Animal_Welfare_Manual_30_April_2015.pdf).
- <sup>xxiv</sup> Human Society International, *Submission to NSW greyhound racing inquiry*,  
<http://www.hsi.org.au/editor/assets/2013-1018%20-%20HSI%20Submission%20on%20Inquiry%20into%20Greyhound%20Racing%20in%20NSW.pdf>.
- <sup>xxv</sup> <http://www.themercury.com.au/sport/local-sport/greyhound-trainer-disqualified-for-giving-dogs-speed/story-fnj92b0f-1227352183591>.

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<sup>xxvi</sup> Sean Rubinzstein-Dunlop and Lesley Robinson, ABC 7.30 Report, Doping, cruelty and collusion claims dog greyhound racing industry, 15 October 2013, ABC 7.30 Report, <http://www.abc.net.au/7.30/content/2013/s3869813.htm>.

<sup>xxvii</sup> Ibid.

<sup>xxviii</sup> Ibid.

<sup>xxix</sup> <http://www.greyhoundreview.qld.gov.au/pdf/final-report-1-june-2015.pdf>.

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<http://www.racingintegrity.vic.gov.au/home/news+and+publications/publication/s/2015+own+motion+inquiry+into+live+baiting+in+greyhound+racing+in+victoria+final+report>.

<sup>xxxi</sup> Investigation into animal welfare and cruelty in the Victorian greyhound Industry (June 2015) <http://economicdevelopment.vic.gov.au/news-and-media-releases/dedjtr-investigation-into-animal-welfare-and-cruelty-in-the-victorian-greyhound-industry-final-report>.

<sup>xxxii</sup> <http://www.abc.net.au/news/2015-05-19/kittens-used-as-live-bait-in-greyhound-racing/6481250>.

<sup>xxxiii</sup> GAR 86 (B) (2) <http://www.galtd.org.au/GreyhoundsAustralasia/files/GA%20Rules%202015.pdf>.

<sup>xxxiv</sup> [http://tasracing.com.au/industry\\_information/new-lure-rules-and-policies-adopted/](http://tasracing.com.au/industry_information/new-lure-rules-and-policies-adopted/).

<sup>xxxv</sup> Select Committee on Greyhound Racing in NSW) – Response to first report (April 2014 report), *Recommendation 17: That the NSW Government review section 21 of the Prevention of Cruelty to Animals Act 1979, to include ‘kennels’ to ensure allegations of live baiting can be properly investigated.*

<sup>xxxvi</sup> Statement to *The Project* Channel 10 on 5/3/2015. And Rules 86A, B, C in the GA Rules were then adopted on 20/4/2015 - <http://www.galtd.org.au/GreyhoundsAustralasia/files/GA%20Rules%202015.pdf>.

<sup>xxxvii</sup> <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/188>.

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<http://www.galtd.org.au/GreyhoundsAustralasia/files/GA%20Greyhound%20Welfare%20Strategy.pdf>.

xxxix <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/196>.

xl <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/198>.

xli <http://www.couriermail.com.au/news/queensland/greyhound-racing-official-steven-hawkins-quits-amid-fallout/story-fnn8dlfs-1227290626409>.

xlii See Para 1.12 - <http://www.greyhoundreview.qld.gov.au/documents/darren-condon-first-statement.pdf>.

xliii

<http://www.galtd.org.au/GreyhoundsAustralasia/files/GA%20Participant%20Feedback%20Form.pdf>.

xliv <http://www.grv.org.au/wp-content/uploads/2014/12/Fact-Sheet-Breeding-Overall.pdf>.

xlv <http://www.grv.org.au/wp-content/uploads/2014/12/Fact-Sheet-Vaccination-Changes.pdf>.

xlvi

<http://www.parliament.nsw.gov.au/Prod/Parlment/committee.nsf/0/87E4F49B9629DB38CA257C94000E645E>.

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<http://www.parliament.nsw.gov.au/Prod/Parlment/committee.nsf/0/87E4F49B9629DB38CA257C94000E645E>.

xlviii <http://www.grv.org.au/wp-content/uploads/2014/07/Animal-Welfare-Penalty-Guidelines-July-1-2014.pdf>.

xlix [http://tasracing.com.au/wp-content/uploads/2013/01/12907777\\_19management26careforeach.pdf](http://tasracing.com.au/wp-content/uploads/2013/01/12907777_19management26careforeach.pdf).

<sup>l</sup> Dr Karen Dawson's presentation to the 2014 meeting of the Australian Greyhound Veterinarians (conference proceedings).

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<sup>li</sup> Dr Peter Yore, Kidney health in racing Greyhounds: Proceedings of the Australian Greyhound Veterinarians Annual Conference, 2012.

<sup>lii</sup> Judge GD Lewis to Hulls, Victoria, 1 August 2008 re Integrity Assurance in Victoria's Racing Industry <http://www.justice.vic.gov.au/home/justice+system/laws+and+regulation/report+on+integrity+assurance+in+the+victorian+racing+industry>.

<sup>liii</sup> GAR 86 B (2) - <http://www.galtd.org.au/GreyhoundsAustralasia/files/GA%20Rules%202015.pdf>.

<sup>liv</sup> <http://www.greyhoundreview.qld.gov.au/pdf/final-report-1-june-2015.pdf>.

<sup>lv</sup> <https://assets.justice.vic.gov.au/ric/resources/b08942c3-590c-432f-b7c9-ddcb037e639b/2015+own+motion+report+into+live+baiting+in+greyhound+racing+in+victoria.pdf>.

<sup>lvi</sup>

[http://economicdevelopment.vic.gov.au/\\_data/assets/pdf\\_file/0018/1108026/20150611\\_DEDJTR\\_Greyhound-report\\_FINAL.pdf](http://economicdevelopment.vic.gov.au/_data/assets/pdf_file/0018/1108026/20150611_DEDJTR_Greyhound-report_FINAL.pdf).

<sup>lvii</sup> <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/197>.

<sup>lviii</sup> <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/197>.

<sup>lix</sup> <http://www.australianracinggreyhound.com/australian-greyhound-racing/stewards-reports/ian-hoggan-fined-1000-for-exporting-greyhound-to-macau/51214>.