

The Secretary,  
Joint Select Committee on Greyhound Racing in Tasmania  
Parliament House  
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12 June 2015

Dear Sir/Madam

### **Inquiry into Greyhound Racing in Tasmania**

Thank you for providing the opportunity to provide a submission to the Inquiry into Greyhound Racing in Tasmania. The RSPCA welcomes the Inquiry which is urgently needed to address serious animal welfare problems associated with greyhound racing. This submission has been prepared in collaboration with RSPCA Tasmania.

For many years, the RSPCA has held serious concerns about the extensive animal welfare problems associated with greyhound racing, including illegal live baiting. These concerns were confirmed in the recent *Four Corners* ABC program on live. Multiple greyhound trainers including those with a high profile in the industry are directly implicated in live baiting practices, indicating that animal cruelty is widespread and entrenched in the industry. Given the extent of issues uncovered so far in the greyhound industry across multiple states, there is no reason to believe that live baiting is not occurring in Tasmania and therefore stringent measures must be implemented to ensure it is effectively prevented.

Other serious animal welfare issues associated with greyhound racing requiring urgent attention include significant overbreeding and high wastage rates and the resultant high numbers of 'unwanted' greyhounds; high euthanasia rates, low rehoming rates, injuries suffered during training and racing; poor housing conditions and a lack of socialisation and environmental enrichment, among other animal welfare issues.

It is vital that the Inquiry effectively addresses these animal welfare issues and that action is taken to meet increasing community expectations about the treatment of greyhounds involved in greyhound racing. Ensuring the welfare of greyhounds involved in greyhound racing is critical. There should be an expectation and formal processes in place to ensure that each individual greyhound born will become a companion pet when they leave the racing industry (whether they race or not). This necessitates fundamental cultural change within the industry.

Detailed information and recommendations are provided below under the relevant terms of reference. Please do not hesitate to contact me should you wish to discuss these comments further.

Yours sincerely,



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## **RSPCA submission to the Inquiry into Greyhound Racing in Tasmania, June 2015**

*Terms of Reference (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;*

The RSPCA is of the view that there are fourteen areas of serious animal welfare concern with the greyhound racing industry, as listed and detailed below. Each section includes information on the scope of the problem and recommends strategies for the future.

1. Significant overbreeding and high wastage rates
2. High euthanasia rates and low rehoming rates
3. Injuries suffered by greyhounds
4. Lack of industry transparency and accountability
5. Insufficient socialisation of greyhounds
6. Housing conditions and environmental enrichment
7. Enforceable standards for greyhounds
8. Licensing and Inspection regime
9. Education of participants
10. Extending the racing career of greyhounds
11. Administration of illicit drugs and other banned substances
12. Illegal live baiting
13. The welfare of greyhounds in the possession of disqualified owner/trainer
14. Export of Australian greyhounds

### **1. Significant overbreeding and high wastage rates**

Evidence shows that significant overbreeding and high wastage rates are inherent in greyhound racing. Thousands of greyhounds are born each year in Australia that are surplus to industry requirements. On a national level, about 35-40 per cent of greyhounds born (about 6000-7000 greyhounds every year) will never receive a registered racing 'name' and hence never race<sup>i,ii</sup>. This represents the immediate wastage rate. Further ongoing 'wastage' occurs over time as 'named' racing greyhounds retire from racing or are discarded due to injury or sub-optimal performance, among other reasons.

In Tasmania, Greyhounds Australasia industry statistics and the Tasmanian Review of Arrangements for Animal Welfare in the Tasmanian Greyhound Racing Industry Final Report (Tasmanian report)<sup>iii</sup> show that between about 600-700 greyhounds are whelped each year in Tasmania. The Tasmanian report also reveals that about 50 per cent of the greyhound pups born in Tasmania in 2011/2012 are recorded as 'unnamed' (this includes 'unnamed' and 'deceased prior to registration'). Of the 269 dogs listed as 'unnamed' for the 2011/2012 cohort, the majority are listed as deceased (216 dogs), 24 retired and 29 still in active training/education.

This high initial failure rate is a significant finding as it indicates fundamental problems in the quality of the breeding, rearing and training practices that currently occur in Tasmania.

In addition to immediate wastage, further ongoing 'wastage' occurs over time in the population of 'named' Tasmanian greyhounds. Of the 273 'named raced greyhounds' from the 2011/2012 cohort, 98 dogs (over one third) are listed as deceased. It is also important to note that according to Racing Services Tasmania (RST) data, a proportion of named greyhounds will also not go on to race. In the 2011/2012 cohort 306 greyhounds were named and of these named greyhounds, 33 are reported as 'unraced'<sup>iii</sup> (28 of these dogs are reported as deceased).

The consequence of high wastage is a high number of unwanted greyhounds. This situation is compounded by a concomitant lack of capacity to rehome these unwanted greyhounds, and in some cases a lack of interest in attempting to rehome them, which then leads to high euthanasia rates.

### **Recommendations to address overbreeding and high wastage rates**

Strategies should aim to:

- Significantly reduce the number of greyhounds born each year.
- Significantly improve the quality of breeding, rearing and training programs.

#### ***Recommended strategies:***

1. *Any government or industry financial incentive schemes that encourage breeding of greyhounds should be immediately discontinued. Funding for the Tasmanian 'Vaccination Microchipping and Rearing Rebate' formerly referred to as a breeder's bonus should be redirected to rehoming initiatives for greyhounds.*
2. *A comprehensive independent review of breeding, rearing, training and housing practices should be undertaken to identify areas where significant improvements are required. This review should include external key stakeholder input from animal welfare organisations and the veterinary profession etc.*
3. *Best practice contemporary animal welfare standards for breeding, rearing, training and housing must be attained in order to increase success rates and reduce wastage.*
4. *Mandatory breeding limitations*
  - a. *The introduction of a maximum number of litters permitted for each breeding female and a maximum number of litters permitted to be registered by greyhound owners and attach these maximum limits to licence/registration conditions.*
  - b. *A limit to the frequency of litters for an individual breeding female, attached to licence/registration conditions. This would help to enable enough time to properly assess the 'success' of a litter before considering any further breeding.*
5. *Expansion of the GRV/GRNSW joint animal welfare strategy proposal of a tiered system of trainer licence types which would stipulate how many greyhounds trainers are able to train - and expand this tiered system to stipulate how many greyhounds are permitted to be bred/kept by breeders, whelpers, owners, rearers and all other life stages.*
6. *The regulatory authority should regularly assess participant 'success rates' with their greyhounds by taking into account not only 'racing success' but also the rehoming success for their greyhounds (ie what is the outcome for this participant's greyhounds). Licence*

*renewals and permitted future breeding should be subject to demonstrated high success rates.*

*7. Improve the quality of breeding programs to help reduce wastage rates:*

- a. Avoid inbreeding, inherited diseases and injury prone lines.*
- b. Careful and well-informed selection of suitable parent dogs based on both physical and behavioural (temperament) characteristics. Noting for example that anxiety is heritable. Anxiety can affect dog welfare but may also affect performance and hence influence wastage rates.*

*8. Ongoing mandatory education courses for all owners, breeders, whelpers, rearers and trainers (not just new participants) prior to issuing and/or renewing a licence for that life stage.*

*9. Education courses should be developed in consultation with external stakeholders to ensure best practice standards are maintained.*

*10. Breeding programs should be based on veterinary advice.*

*11. Targets and timeframes must be developed so that the Tasmanian greyhound industry has clear and published goals for the reduction in the number of greyhounds born and wastage to report their progress against annually.*

## **2. High euthanasia rates and low rehoming rates**

Many unwanted greyhounds (both named and unnamed) will be euthanased despite being otherwise healthy and rehomable. Comprehensive national statistics on the fate of unwanted greyhounds are not published by industry but based on the available information it is clear that the euthanasia rate is unacceptably high, with a conservative estimate of about 9,000 greyhounds euthanased every year in Australia<sup>iv</sup>. The recently published report of the Queensland Greyhound Racing Industry Commission of Inquiry (Queensland report)<sup>v</sup> revealed that of the greyhounds reported as retired, on average about two thirds are euthanased upon retirement. In 2013, 74.4 per cent of the greyhounds reported as 'retired' were recorded as having been euthanased.

The Tasmanian Report<sup>iii</sup> reveals a similarly high euthanasia rate in Tasmania. In the 2013/14 racing season, 486 greyhounds were reportedly euthanased and in the 2014/15 racing season to date (1 August 2014 to 10 March 2015), 267 greyhounds have already been reported as euthanased. To provide some perspective, according to RST data in the 2012/13 period, 608 greyhounds were whelped in Tasmania and in 2013/14, 694 greyhounds were whelped. The RSPCA considers that the current euthanasia rates in Tasmania are unacceptably high.

The Tasmanian report notes that the accuracy of the figures referenced is reliant on those in charge of a greyhound notifying the regulator, in accordance with the Rules of Racing, as to the fate of the greyhound once it is no longer competing in races. Therefore, until an audit of all kennels is finalised, the report states that these should be viewed as minimum figures.

While greyhound adoption programs are a step forward, they cannot cope with the high numbers of greyhounds (more than 18,000 greyhounds born in Australia each year<sup>1</sup>) moving through the system. Only a very small proportion of ex-racing greyhounds (around 1000) are adopted annually in Australia through industry greyhound adoption programs<sup>iv</sup>. In New South Wales for example, approximately 8,000 greyhounds are born each year in NSW. However the Greyhound Racing NSW (GRNSW) Industry adoption program only rehomed about 52 greyhounds in 2012<sup>vi</sup>.

The Tasmanian Report<sup>iii</sup> also reveals a low rehoming rate in Tasmania. In the 2011/2012 cohort, of the 617 greyhounds whelped in Tasmania, 384 dogs are reported as deceased (about 62 per cent), 33 dogs retired (about 5 per cent) and 200 dogs (about 32 per cent) are listed as still in active training/education.

In the 2013/14 racing season 121 greyhounds were reported as retired/rehomed, 62 in GAP (note this includes dogs whelped in Tasmania and dogs relocated to Tasmania). It is not clear what 'retired' refers to and whether this is synonymous with 'rehomed'. Regardless, given that 600-700 greyhounds are born each year in Tasmania and that apparently a number of greyhounds are transferred to Tasmania from other Australian states, the number rehomed in Tasmania each year is proportionately very low. The RSPCA considers that the current rehoming rates are unacceptably low and that urgent action must be taken to address this problem.

Compulsory muzzling requirements for greyhounds in some states/territories may cause public misperceptions about the suitability of greyhounds as pets. Greyhounds that do not require a muzzle for safety reasons should be able to travel in public unmuzzled. This would assist in improving the image of greyhounds as pets and increase market demand for greyhounds as pets helping to ease rehoming pressure.

#### **Recommendations to address high euthanasia rates and low rehoming rates**

12. *Significantly greater resources for both industry and reputable non-industry rehoming programs.*
13. *Significantly greater resources for programs that promote the public image of greyhounds as suitable pets.*
14. *When a greyhound pup is registered, the required registration fee should include a component for the future welfare of the dog. The fee amount should be significant enough to reinforce the importance of animal welfare within the industry. The fee would attach to each greyhound during its involvement in the industry and administrative arrangements developed to enable transfer of the fee whenever ownership changed. The fee would in part be refundable to the last licensee responsible for the fee upon the regulatory authority being satisfied that appropriate arrangements had been made for the welfare of the dog<sup>v</sup>.*
15. *An animal welfare levy should be introduced and managed by Racing Services Tasmania.*
16. *A review of current greyhound muzzling laws in Tasmania to ensure that greyhounds not requiring a muzzle for safety, are able to travel in public unmuzzled.*
17. *Mandatory requirements to provide adequate socialisation for all greyhounds, including during the critical socialisation period which occurs from 3 weeks to 17 weeks of age. This is vital as a lack of socialisation during this period can compromise dog welfare; affect the ability to rehome some greyhounds and may impact negatively on performance (and thus increase wastage rates).*
18. *Fundamental cultural change. There must be an expectation that where a dog is bred for racing the breeder/owner must take responsibility for the welfare of all dogs which are bred, irrespective of their racing ability. Further, there must be an expectation that each greyhound born will be rehomed as a pet when they leave the industry whether they race or not.*

### 3. Injuries suffered by greyhounds

Injuries are a major animal welfare issue for greyhounds as they cause pain, suffering and distress to the affected animals. Injuries are common in greyhound racing and are a major cause of wastage<sup>vii</sup>. Various types of injuries are regularly reported including serious bone fractures and other musculoskeletal injuries. Other types of injuries such as hypoxic fits (seizures caused by a lack of oxygen) have also been reported.

Collisions between dogs are regularly reported and the first turn of the race track appears to be a common site for accidents to occur. Many of the injuries sustained necessitate a suspension from racing. Injuries can also be of a very serious nature leading to death on the track or euthanasia at the track such as broken backs and necks.

Track design and surfaces can influence the types and rates of injuries suffered<sup>viii,ix</sup>. The Tasmanian report<sup>iii</sup> included some track injury data which showed that there is a higher injury rate in Devonport compared to Launceston and Hobart and factors contributing to this difference should be investigated.

While injury statistics are not published for all tracks, based on the available industry figures the RSPCA estimates that more than 600 greyhounds are injured every month during races across Australia. Additional injuries will occur during training however as far as the RSPCA is aware, these injuries are not formally recorded or reported.

Another important issue relates to the number of greyhounds that are subsequently euthanased after a race day injury. In order to properly assess the significance of an injury on race day, the ultimate outcome for an injured greyhound including whether they were subsequently euthanased must be recorded and published which typically does not occur currently<sup>v</sup>. It is important to note that some injuries suffered by greyhounds may be treatable however the owner may choose to euthanase for economic reasons.

Concerns have also been raised about the potential for the over-racing of greyhounds and a lack of rules regarding the frequency of racing and the provision of adequate rest periods between races. Physical over-exertion during races and training is another key issue to examine. The Tasmanian report<sup>iii</sup> identifies cases where greyhounds have suffered from hypoxia and this issue should be examined further.

It is necessary to monitor the prevalence of injuries to racing greyhounds in order to supervise animal welfare and to accurately measure the effectiveness of strategies to reduce injuries over time.

#### **Recommendations to reduce injury rates**

19. *Industry should be required by legislation to publish comprehensive injury statistics on an annual basis for all tracks in Tasmania. These statistics should include injuries sustained in training and trialling in addition to racing.*
20. *Published injury data should include the ultimate outcome for any injured greyhounds including whether the greyhound died on the track; was euthanased on the track; suspended from racing or retired (and what the ultimate outcome was upon retirement - euthanasia, rehoming as a pet etc.)*
21. *A comprehensive injury database should be developed to record injury statistics and to examine the links between track designs and track surfaces and the types and rates of injuries sustained.*

22. *There should be an immediate independent review of all track designs in Tasmania.*
23. *Evidence-based track infrastructure works should be undertaken to minimise the risk of injury to greyhounds.*
24. *Particular areas of concern to examine include the first turn of racetracks where injuries appear to be common and collisions between dogs. Consideration should be given to aspects including straight tracks and a reduction in the number of dogs per race.*
25. *Targets and timeframes should be implemented to ensure injury incidence rates are reduced in a timely way.*
26. *Mandatory attendance of a registered veterinarian at each race meeting.*
27. *Rules to prevent the over-racing and physical over-exertion of greyhounds.*

#### **4. Lack of industry transparency and accountability**

Currently there is a lack of comprehensive published data on the life cycle and outcome for greyhounds born into the greyhound racing industry. This lack of transparency has major ramifications in terms of monitoring animal welfare outcomes in the industry.

Missing figures include the exact number of greyhounds born each year, the exact number of greyhounds 'named' as a proportion of the greyhounds born; the exact number of greyhounds euthanased and rehomed each year and accurate injury rates. The Queensland report<sup>v</sup> revealed that between the years 2003 and 2013 approximately 7,000 greyhounds are unaccounted for, in that they were named, but not registered as retired. In the RSPCA's view it is unacceptable to have any greyhounds unaccounted for. 'Unnamed' greyhounds are a particularly vulnerable population of greyhounds.

Reliable identification and tracking of each individual greyhound is critical to ensure animal welfare and to measure any improvements in over breeding and wastage levels over time.

#### **Recommendations in order to improve transparency and accountability**

28. *Industry should be required under legislation to collect and publish comprehensive statistics on the lifecycle and outcome for all greyhounds (both named and unnamed) involved in the greyhound racing industry in Tasmania on an annual basis.*
29. *Each individual greyhound born is reliably identified (via microchip), tracked and the outcome for each greyhound recorded.*
30. *A greyhound should become a licenced animal the day its whelping notice (notification of a result of service) is in, not at marking up or naming. Thus a greyhound must be under the care of a licenced person at all stages of its lifecycle until retirement.*
31. *Annual published statistics must include the exact number of greyhounds:*
  - a. *born each year*
  - b. *'named' each year*
  - c. *'named' as a proportion of the number of greyhounds born in that year*
  - d. *euthanased each year*
  - e. *rehomed as a pet, or*

*f. any other outcome such as death on track, exported etc*

- 32. Mandatory requirements for participants to inform the relevant authority of the outcome for each greyhound. It should be an offence to fail to notify the relevant authority with severe penalties applicable where greyhounds are determined to be unaccounted for.*
- 33. The Tasmanian report<sup>iii</sup> includes figures from the RST database. It is not clear if 'deceased' refers to both euthanasia and other situations such as death by natural causes and what proportion of the total each might represent. It is recommended that the RST database be improved and additional categories added to ensure outcomes and the specific cause of death is clear.*
- 34. The Tasmanian report also reveals that a number of pups are 'deceased prior to registration'. 61 pups in 2012/13 and 59 pups in 2013/2014. This issue should be investigated to determine why these animals are listed as 'deceased'.*
- 35. A national tracking system should be developed such that a greyhound born in one state that moves interstate can still be tracked and the outcome for that greyhound recorded and published. This is particularly relevant in Tasmania where greyhounds apparently move to Tasmania from interstate.*
- 36. A comprehensive review of outcomes for Tasmanian greyhounds including an investigation of whether non-recoverable blood collection from unwanted greyhounds at veterinary clinics and transfer to universities and medical research facilities are potential outcomes currently occurring in Tasmania. Strategies must be implemented to address this issue and protect the welfare of greyhounds. For example, to reduce the incidence of non-recoverable blood collection from greyhounds the underlying causes of greyhound overbreeding and wastage must be addressed to reduce the number of unwanted greyhounds presented for euthanasia. In addition, alternative blood supply chains (that do not involve euthanasia) must be urgently expanded such as recoverable blood collection from suitable, healthy owned 'donor' pet dogs (including pet greyhounds) under close supervision and at appropriate intervals to ensure the welfare of the dogs.*
- 37. In addition to industry data collection, publication and registration of greyhounds, greyhounds (including those registered with Racing Services Tasmania) should be required to be registered under the Tasmanian Dog Control Act 2000, i.e. registered with their local council and microchip information for greyhounds (including those registered with Racing Services Tasmania) should be required to be recorded on a recognised companion animal microchip register.*

## **5. Socialisation of greyhounds**

Many greyhounds are not adequately socialised, either with other dogs or with humans. In particular many greyhound puppies do not receive adequate socialisation during the 'critical canine socialisation period' which occurs from 3 weeks to 17 weeks of age. Experiences during this period influence a dog's behaviour throughout its life.

A lack of adequate socialisation is a major greyhound welfare issue. If dogs are deprived of adequate socialisation they are more likely to develop fearfulness and antisocial behaviour<sup>x</sup> which impacts negatively on their welfare and may also affect the ability to rehome some greyhounds.

There must be an expectation within the industry that each greyhound born will be rehomed as a pet, providing adequate socialisation is an essential part of this expectation.

#### **Recommendation in relation to socialisation**

*38. Mandatory requirements to provide adequate socialisation for all greyhounds combined with education programs should be implemented.*

### **6. Housing conditions and environmental enrichment**

Poor housing conditions and a lack of environmental enrichment is another key animal welfare issue for many greyhounds. Greyhounds are often kept in small, barren, single-dog kennels without environmental enrichment.

Dogs are not well adapted for life in kennel environments; most find kennel life challenging and many experience compromised welfare. Many greyhounds were neither bred nor raised in kennels and for these dogs the transition from rearing properties to small barren kennels is especially stressful<sup>xi</sup>. Research has shown that many working dogs exhibit high levels of physiological stress in response to kennelling. Furthermore, these dogs tend to perform poorly during training, establishing links between welfare and working ability (performance)<sup>xii</sup>.

There are approximately 210 greyhound kennels in Tasmania<sup>iii</sup>. Kennelling should be avoided where ever possible however, where kennelling is unavoidable significant changes must be made to the way in which greyhounds are kennelled including best practice habituation protocols to minimise any stress involved.

#### **Recommendations in relation to housing and environmental enrichment**

*39. Mandatory requirements to provide daily environmental enrichment including feeding enrichment for all greyhounds should be implemented.*

*40. Enforceable standards for greyhounds at all life stages to ensure good housing conditions that meet the physiological, behavioural and social needs of all greyhounds.*

### **7. Enforceable standards for greyhounds**

There is an urgent need for independent and comprehensive regulation to protect the welfare of greyhounds at all life stages including breeding, rearing, training, trialling, racing and rehoming etc. In NSW for example, the RSPCA has recommended the implementation of a greyhound specific enforceable Animal Welfare Code of Practice under the Prevention of Cruelty to Animals Act and Prevention of Cruelty to Animals Regulation covering all life stages for greyhounds and incorporating adequate socialisation and environmental enrichment and good housing conditions.

The RSPCA considers the pre-existing documents *Management & Care for each stage in the lifecycle of a Greyhound* and *Recommended Standards for The Care of Greyhounds* to be inadequate, for example, they do not appear to include reference to socialisation or environmental enrichment.

#### **Recommendations in relation to enforceable standards**

*41. The implementation of enforceable standards/an enforceable code of practice, for greyhounds at all life stages.*

42. *Key stakeholders including the RSPCA should be involved in the development of these enforceable standards.*

## **8. Licensing and Inspection regime**

Licensing and inspection regimes should be strengthened to ensure individual dogs can be traced and the welfare of greyhounds at all life stages monitored and this information used in order to inform future standards, track designs, policies and procedures.

### **Recommendations in relation to licensing and inspection regimes**

43. *A stringent licensing and inspection regime should be implemented for each life stage for greyhounds including breeding, rearing, breaking in, pre-training and education/training etc*
44. *Independent inspection of facilities prior to issuing a licence for each life stage to ensure the applicant has the capacity to provide appropriate living conditions that meet the physiological, behavioural and social needs of the animals and provide a good quality of life.*
45. *A greyhound to become a licenced animal the day its whelping notice (notification of a result of service) is in (received), not at marking up or naming. Thus a greyhound must be under the care of a licenced person at all stages of its lifecycle until retirement.*
46. *Ongoing regular independent announced and unannounced inspections/audits of all facilities for all life stages.*
47. *Mandatory ongoing compliance with enforceable greyhound standards/an enforceable code of practice made a condition of licensing.*
48. *Mandatory requirements for record keeping and log books for inspection at any time.*

## **9. Education of participants**

All participants (at each life stage) should be required to undertake education courses and be assessed on core competencies before obtaining the relevant licence. Evidence shows that current practices by many existing participants are inadequate leading to welfare problems and poor performance. Mandatory education should be combined with independent inspection of facilities prior to issuing a licence.

Key stakeholders including the RSPCA should be consulted in the development of the education modules to ensure best practice contemporary standards are attained.

### **Recommendations in relation to education of industry participants**

49. *Mandatory education courses for new participants prior to issuing a licence for each life stage.*
50. *Ongoing mandatory education courses for pre-existing licence holders in order to maintain a licence.*

## 10. Extending the racing career of greyhounds

The racing career for a greyhound is relatively very short. Dogs who begin a racing career usually start racing at about one-and-a-half years of age and are generally retired by two to five years of age, or earlier if they develop injuries or do not perform well<sup>ii, xiii</sup>.

Maximising racing opportunities for all greyhounds should help to extend the racing career of greyhounds and ease rehoming pressure<sup>v, xiv</sup>.

### **Recommendations to extend the racing career**

- 51. *Race meetings should provide ample opportunities for greyhounds of all abilities, grades and ages.*
- 52. *A set of grading rules would be required to ensure the fairness of different classes of racing.*

## 11. Administration of illicit drugs and other banned substances

Various pharmaceutical substances have been administered to racing greyhounds in the quest for enhanced performance. Dogs have tested positive to a range of substances including amphetamines, methamphetamines (the drug Ice), caffeine, anabolic steroids, Viagra and cocaine. Recently samples have also detected irregular Erythropoietin (EPO) findings.

Racing authorities maintain a list of banned substances and run drug testing programs, however drug administration still occurs.

Administration of banned substances is an animal welfare issue. RSPCA Australia's main concern regarding the administration of banned substances to greyhounds is the negative impact that reported substances can have on the physical and/or psychological well-being of greyhounds.

### **Recommendations related to illicit drugs and other banned substances**

- 53. *Concerns have been raised that certain substances which have been reported to be given such as erythropoietin (EPO) are not detectable or easily detectable using current routine swabbing procedures. It has been suggested that EPO detection may require blood sampling rather than urine sampling. RSPCA Australia does not support routine blood sampling of greyhounds to detect banned substances as this is a much more invasive procedure which causes pain to the animal when compared to a voided urine sample which is non-invasive and does not cause any pain.*
- 54. *Detection of the administration of testosterone to entire female dogs is possible (a threshold exists), however detection of the administration of testosterone to male dogs is an issue using current available methods. The Australian Racing Board (ARB) recently introduced a new rule whereby anabolic androgenic steroids are banned from birth. There are no time or therapeutic exemptions. The ban applies to all unregistered juveniles and registered racehorses until their retirement as a racehorse. An equivalent rule should be introduced into greyhound racing whereby anabolic androgenic steroids are banned from birth (no time or therapeutic exemptions).*

55. *Industry could investigate through their own and other research and development initiatives, the development of a urine EPO test; detection of testosterone in male dogs and the accurate distinction between endogenous testosterone and administered exogenous testosterone.*
56. *The RSPCA also has concerns regarding the effectiveness as a deterrent of current penalties for participants involved in the administration of banned substances. Stricter penalties and suspensions/bans from racing, coupled with forfeiture of prize money, may act as a greater deterrent.*

## 12. Illegal live baiting

Strong action must be taken to ensure live baiting is effectively prevented in Tasmania. A number of recommendations are listed below.

The Tasmanian report recommended that a rule be created 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. The RSPCA has some concerns about this recommendation in relation to the welfare of the greyhound being penalised. If this recommendation was to be implemented then an attached mandatory requirement must be implemented to ensure the welfare of the greyhound involved including transfer to the care of the regulator, RST. A fund should be developed for this specific purpose similar to the proposed fund to care for any greyhounds under the control of a disqualified participant.

The RSPCA also recommends that the current exemption allowing the use of 'tanned sheepskin' be urgently removed. The use of animal skins is unnecessary, sets a dangerous precedent and fuels misperceptions that the use of 'animal tissue' is in some way advantageous. Clearly, a significant factor in the use of live animals as bait was related to the misguided perception that using animals/animal tissue would create an advantage or increase chase motivation, these practices are based on longstanding traditional beliefs and ideas that are considerably out-dated and not evidence-based. A total prohibition on animal tissue would also importantly remove the temptation for participants to escalate from treated animal skins to 'fresh' animal skins and then on to dead animal parts/carcasses which in turn may (and already has) advanced to live animal use.

Greyhounds can be successfully trained to chase using artificial objects only. And this was supported in the Tasmanian report<sup>iii</sup> which states that 'All industry participants spoken to during this review were confident that a greyhound could be taught to chase using an artificial lure and this was demonstrated to the Panel'.

The RSPCA position is consistent with the position of the major greyhound racing bodies in Australia. Greyhound Racing Victoria (GRV) on 19/2/15 and Racing Queensland (RQ) on 2/3/15 mandated the use of artificial lures only for all greyhound training and racing contexts.

Furthermore the Greyhounds Australasia Rules were amended on 20/04/15 and now prohibits the use of any part of an animal.

Tasmania should amend its current lure policy to ensure consistency with the National Rules and the other major state greyhound racing bodies. This would also ensure that the policy meets current community expectations and contemporary best practice training methods.

### **Recommendations in relation to live baiting**

57. While all states and territories in Australia prohibit live baiting, current legislative provisions do not go far enough to ensure that offenders can be prosecuted. The RSPCA believes that state and territory animal welfare laws must be amended to introduce the following two offences:
  - a. An offence to have custody or control of a “prescribed animal” (to include all species commonly used in baiting) at the same premises where greyhounds are kept in connection with racing; and
  - b. An offence to kill an animal for the purposes of using that animal’s carcass for baiting, coursing or training a greyhound in connection with racing.
58. In addition to animal welfare legislative amendments the rules of racing should include offences for a person to keep or house on a property where greyhounds are kept or trained any animals that could be used for live baiting. There should also be an offence for a person to have on a property where greyhounds are kept or trained, a device for the trapping of animals that could be used for live baiting.
59. The rules must be urgently amended to require the use of artificial/synthetic lures only where ever breaking-in, pre-training, education, training, trialling or racing including arm trials/run on trials of greyhounds occurs. The current exemption allowing the use of ‘tanned sheepskin’ must be removed immediately.
60. All training/trialling tracks and bullrings (that is, where any activity of breaking in, pre-training, training or trialling occurs) must be identified and registered with Racing Services Tasmania (RST). Private training/trialling tracks and bullrings must be prohibited - regulations should be introduced such that dogs can only be trained at registered premises.
61. All training/trialling tracks and bull rings must be regularly inspected (both announced and unannounced) by RST.
62. In addition RST should supervise tracks. Currently it appears that the commercial body, Tasracing undertakes a track supervisory role which the RSPCA considers inappropriate. If it was not possible for RST to supervise all registered tracks then the recommendation from the Queensland report should apply which states that: the rules of racing should be reviewed to ensure that any activity of breaking in, pre-training, training or trialling is only permitted at registered tracks and in the presence of a person registered as the operator of the track or a person duly authorised by that person to supervise the activity. Additionally, 24/7 CCTV monitoring which is only available to Racing Services Tasmania stewards or RSPCA officers should be applied.
63. A mandatory penalty introduced under the Rules of Racing that any person found guilty of live baiting is disqualified from the industry for life.
64. Strengthened offences under the relevant animal welfare legislation including significantly greater penalties (imprisonment and monetary fines).
65. Introduce an offence under the animal welfare legislation for being present at a place where live baiting or the use of dead animals is occurring. There should be significant penalties and disqualifications for witnesses who do not report live baiting.

66. *Mandatory requirements for records and log books to kept detailing the individuals, locations and methods employed in training. This information should be required to be notified by statutory declaration. Another additional requirement would be for the owner of the greyhound to be required to counter sign the notification to declare and confirm the accuracy of the information supplied. There would need to be penalties for providing false or misleading information or failure to notify at all<sup>v</sup>.*
67. *The breaking in of a greyhound and its pre-training which involves educating it to chase and assessing its abilities in this respect is the time when the risk of live baiting is most likely to occur. This period extends from when the greyhound is about 3 months old until it is 18 to 20 months old This is the period during which steps to deter those who may be minded to engage in this practice should be given priority<sup>v</sup>.*

### **13. The welfare of greyhounds in the possession of disqualified owner/trainer**

Disqualification of an owner/trainer from holding a licence because of misconduct presents potential risks to the greyhounds in their possession.

#### **Recommendation in relation to disqualified owner/trainer**

68. *The relevant regulations and rules should be amended to provide for the welfare of greyhounds in the possession of a disqualified licence holder due to misconduct. In the first instance the owner should be responsible for the cost of the care of the dog until suitable arrangements can be made for its ongoing welfare (rehoming). Where the owner defaults in this obligation, industry should cover the costs from a fund specifically established for such purposes<sup>v</sup>.*

### **14. Export of Australian greyhounds**

Australian greyhounds are currently sold and exported overseas for racing purposes. Greyhounds have been exported to countries including China and Vietnam. In 2014, a total of 654 greyhounds were exported and more than half of these greyhounds were sent to China (260 to Macau, 50 to China and 72 to Hong Kong)<sup>xv</sup>.

Exporting places greyhounds at significant risk of very poor animal welfare outcomes including stress and injuries associated with long-distance transport, lack of animal welfare legal protection in importing countries and the potential to enter the dog meat trade.

In 2014, Greyhounds Australasia introduced voluntary suspensions of greyhound passports to certain destinations due to animal welfare concerns.

The apparent lack of a formal tracking system for dogs exported to other countries means that the fate of Australian greyhounds is currently unknown. There are also serious concerns about the apparent lack of formal rehoming/adoption programs in destination countries.

The export of greyhounds must be prohibited, except where the greyhound is accompanying their owner as a pet.

#### **Recommendations in relation to greyhound export**

69. *Local rules should be introduced in Tasmania which prohibit the international export of Tasmanian greyhounds except where the greyhound is accompanying their owner as a*

*recognised pet (companion animal). This prohibition should be linked to registration and licensing requirements.*

- 70. A Code of conduct for participants could also be developed which includes a prohibition on the export of greyhounds except where the greyhound is accompanying their owner as a recognised pet (companion animal).*
- 71. Where any participant is found to breach this export prohibition, severe penalties should apply such as life bans.*
- 72. Additionally, export regulations should be implemented by the government to prohibit the export of greyhounds from Australia except where the greyhound is accompanying their owner as a recognised pet (companion animal).*

***Terms of reference (b) the role of regulatory authorities in upholding animal welfare standards in the industry and encouraging best practice;***

- 1. Regulatory structure***
- 2. Legislation***

### **1. Regulatory structure**

While the current regulatory structure in Tasmania predominantly separates commercial and integrity functions and this must be maintained, there appear to be some elements of self-regulation within the current framework. For example, Tasracing officials appear to supervise tracks. In the RSPCA's view it is inappropriate for the commercial body to take a supervisory role and these functions should be transferred to RST.

RST should have greater oversight in order to prevent policy conflicts such as the breeder's bonus scheme which exacerbates the problem of overbreeding and the animal skin lure exemption which maintains dangerous outdated practices.

#### **Recommendations in relation to regulatory structure**

- 73. There must be a formal and complete separation between regulatory and integrity functions and the commercial/promotion of industry. Any element of self-regulation must be identified and removed.*
- 74. The regulatory structure must prevent any conflicts of interest.*
- 75. RST should have greater oversight to ensure policy conflicts do not arise.*

## 2. Legislation

Animal welfare legislation must be strengthened to better protect greyhounds and other animals.

### Recommendations in relation to legislative review

76. Review animal welfare legislation and any other relevant legislation to enhance animal welfare provisions.
77. Enhance the powers of entry for animal welfare officers under the Animal Welfare Act 1993, 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.
78. In the Animal Welfare Act the term ‘anything’ in relation to the seizure of evidence should be interpreted to include an animal.
79. Improve mechanisms for reporting animal welfare issues and mandate reporting of animal welfare breaches.
80. Review animal welfare legislation to ensure that any device used in the training of greyhounds is humane and does not cause injury, pain, suffering or distress to the animal, for example, the use of prong/pinch collars and electric shock collars must be prohibited.

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<sup>i</sup> Greyhounds Australasia Industry Statistics

<sup>ii</sup> Elliott, R. Toribio, J. and Wigney D. (2010) The Greyhound Adoption Program (GAP) in Australia and New Zealand: A survey of owners’ experiences with their greyhounds one month after adoption, *Applied Animal Behaviour Science*, 124:121–135.

<sup>iii</sup> Andrewartha R. & Murray T. (2015) Review of arrangements for Animal Welfare in the Tasmanian Greyhound Final report.

<sup>iv</sup> RSPCA Australia Knowledgebase.

<sup>v</sup> MacSporran A. (2015) Report of the Queensland Greyhound Racing Industry Commission of Inquiry.

<sup>vi</sup> GRNSW (2013) Greyhound racing in NSW Inquiry Hearing transcript

<sup>vii</sup> Nicholson HL, Osmotherly, PG, Smith BA *et al.* (2007), Determinants of passive hip range of motion in adult Greyhounds, *Australian Veterinary Journal*, 85, 6:217-221.

<sup>viii</sup> Iddon J, Lockyer RH and Frean SP (2014) The effect of season and track condition on injury rate in racing greyhounds, *Journal of Small Animal Practice* 55: 399–404.

<sup>ix</sup> Sicard GK, Short K and Manley PA (1999) A survey of 4 injuries at five greyhound racing tracks, *Journal of Small Animal Practice*, 40: 428-432.

<sup>x</sup> Australian Veterinary Association (2011) Reward-based training: a guide for dog trainers.

<sup>xi</sup> Dr Karen Cunningham Veterinarian (2013) NSW Inquiry into Greyhound Racing.

<sup>xii</sup> Rooney N, Gaines S and Hiby E (2009) A practitioner’s guide to working dog welfare, *Journal of Veterinary Behavior*, 4: 127-134.

<sup>xiii</sup> Beer L, Wilson J and Stephens J. Improving the welfare of the racing greyhound – A GRV perspective.

<sup>xiv</sup> GRV/GRNSW Joint Animal Welfare Strategy 2013.

<sup>xv</sup> Department of Agriculture Export data 2014.