Submission to the Tasmanian Parliamentary Joint Standing Committee on Greyhound Racing Transition

Greyhounds Australasia Submission in Response to the Committee's Invitation of 26 May 2026

Preliminary Note: The Significance of the Bill's Unresolved Status

Greyhounds Australasia (GA) provides this submission in response to the Committee's invitation of 26 May 2026, which identifies two areas of inquiry:

1. the financial, economic and animal welfare impacts of the proposed phase out of greyhound racing in Tasmania, and
2. the future of the Tasmanian racing Deed.

Before addressing those topics, GA considers it necessary to place on record the legislative context in which this Committee is now operating, because that context fundamentally shapes the character of any analysis the Committee can undertake.

The Greyhound Racing Legislation Amendments (Phasing Out Reform) Bill 2025 progressed to the Legislative Council in mid-April 2026. Midway through debate, the Government deferred the Bill. The Premier has since stated publicly that the Bill will not return to the Legislative Council until the Government has the numbers to pass it. As at the date of this submission, the Bill has not been passed and has no confirmed path to enactment.

GA is also aware of industry reporting that the Government may be exploring alternative means of bringing about the cessation of greyhound racing in Tasmania, including short to medium term avenues to defund the code and, in the longer term, the removal of greyhound racing from the Tasracing funding Deed. GA acknowledges these reports are unconfirmed. However, the possibility of such action, and the uncertainty created by it not being ruled out, is itself a source of significant harm to participants, to Tasracing's planning capacity, and to the stability of the broader racing industry. The Committee should seek clarity from Government on whether any such steps are under consideration.

What is not speculative is the Government's own announced measures. In addition to the $4.8 million announced by the Premier in connection with the transition, the Premier has also announced an early exit scheme for participants who wish to leave the industry before the racing closure date. This scheme, like the compensation framework, is currently unfunded, unstructured, and without any published eligibility criteria, methodology or cost estimate. Together, these announcements reflect a pattern of policy commitment that consistently outpaces the development of any plan to give effect to it.

GA submits that what has emerged is, in substance, policy made on the fly. Each new announcement, the phase out itself, the compensation package, the early exit scheme, has been made without the foundational analysis that responsible policy requires. The implications for all stakeholders are, at this point, unknown, untested and in many respects incomprehensible: participants face decisions about their livelihoods and animals without any settled framework; greyhounds face an uncertain future in an unplanned transition; families and communities that depend on the industry have no clear account of what support will be available; and taxpayers are being committed to obligations whose cost has not been calculated.

The consequence of this unresolved and unplanned status is that the Committee is being asked to analyse the impacts of a proposed phase out that has no settled legislative foundation and no credible financial framework. Any modelling of transition costs, welfare outcomes, compensation, or Deed restructuring is necessarily incomplete while the Bill remains in limbo and core policy instruments remain undefined. The answers to the Committee's questions differ materially depending on whether the phase out proceeds by legislation, by administrative action, by Deed amendment, or not at all.

The prolonged uncertainty is itself causing measurable harm. Participants, racing clubs and Tasracing cannot make long-term investment or planning decisions. Mental health pressures within the industry are increasing. The broader Tasmanian racing sector, all three codes, faces growing instability from an unresolved structural question that affects the commercial viability of the entire ecosystem.

GA's first and strongest submission to this Committee is therefore that it should recommend the resolution of the Bill's status as a precondition to any further meaningful analysis. Parliament should either progress the Bill to a vote or withdraw it. The consultation and review phase has concluded. Continued indeterminacy serves no party's interests and is itself one of the most significant risks now facing the Tasmanian racing industry.

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1. The Risk of Administrative Action Outside the Legislative Framework

GA wishes to place before the Committee its concern about reports that the Government may be exploring alternative mechanisms to bring about the closure of greyhound racing outside the legislative process. The possibility of such action, and the uncertainty created by it not being ruled out, is a legitimate concern that this Committee is well placed to examine, given its mandate to oversee the transition framework and the interests of all affected parties.

Legal Barriers to a Non-Legislative Closure

The existing legislative framework creates significant and specific barriers to any such approach. The Racing Regulation and Integrity Act 2024 is the primary legislation governing the regulation and conduct of racing in Tasmania, and racing is explicitly defined to include greyhound racing. That Act does not merely permit greyhound racing, in material respects it requires its ongoing facilitation.

Under section 59 of the Act, Tasracing is legally required to promote Tasmanian racing, specifically including greyhound racing, locally, nationally and internationally; to promote the development of an efficient and effective greyhound breeding industry; and to assist racing clubs with the promotion and marketing of major race meetings. Under section 62, Tasracing must make Rules of Racing for all codes including greyhound racing, a mandatory statutory obligation, not a discretion. Tasracing must ensure those Rules are properly enforced, approve registrations and grant licences under them, and develop a code of conduct for all licensed persons.

The governance framework for Tasracing is established by the Racing (Tasracing Pty Ltd) Act 2009. While section 12A confers a power of direction on the responsible Minister and the Treasurer, that power is expressly limited by section 12A(3)(b): a direction may not be given if it is contrary to the provisions of the Tasracing Act, the Racing Regulation and Integrity Act 2024, or any other Act of Tasmania or the Commonwealth.

A direction that amounts to a ban on greyhound racing, or that orders Tasracing not to act as the principal racing authority for the code, would be directly contrary to the statutory functions vested in Tasracing under the Racing Act. The power of direction cannot be used as a mechanism to achieve what the Parliament has declined to legislate. Similarly, regulation-making power under section 192 of the Racing Act authorises regulations only for the purposes of that Act. Making regulations that would implement a ban on greyhound racing, by any mechanism, would be for a purpose contrary to the statutory intent of an Act that explicitly mandates the facilitation of greyhound racing in Tasmania.

A government that chooses to starve a code of funding, or to direct Tasracing in ways that contradict its statutory obligations, while those legal frameworks remain in place risks creating a situation in which Tasracing has regulatory obligations it no longer has the resources to discharge, and participants have legal entitlements being frustrated by administrative action rather than lawful legislative change. GA submits this is not a permissible approach under Tasmania's existing legislative architecture.

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Racing Integrity and Governance

Australian racing has long been recognised internationally for its integrity systems and oversight. The cornerstone of that reputation is the governance structure underpinning the administrative landscape, the use of legislative instruments empowering statutory bodies as regulators and controlling bodies. In Tasmania, this structure was recently reinforced through the Racing Regulation and Integrity Act 2024, which established the Tasmanian Racing Integrity Commissioner and placed all licensing, stewarding and veterinary regulatory responsibilities within Tasracing as the commercial controlling body.

GA is aware of discussion within Government about reviewing this framework. The provision of racing and integrity services under a statutory structure with primary oversight and accountability to State Government provides a level of administrative transparency and public confidence that cannot be replicated through alternative administrative models. Any attempt to ostracise the greyhound code, whether physically or financially, risks undermining the integrity of the entire racing and wagering ecosystem. That ecosystem delivers substantial public benefit through Tasracing's commercial relationship with the TAB and through Point of Consumption tax contributions from all regulated wagering providers in Australia. Any diminution of Tasmania's racing product reduces the value and attractiveness of that ecosystem to commercial wagering partners.

GA submits that this Committee should seek clarity from Government on whether any steps are being considered to defund or deprioritise greyhound racing outside the legislative process and should recommend that no such steps be taken while the Bill's status remains unresolved and this Committee's work is ongoing. The implications of action of this kind would extend well beyond greyhound racing. If the Government can effectively eliminate a regulated code by administrative means, without the protections and scrutiny that primary legislation demands, the same mechanism would be available in relation to any regulated industry that relies on government funding. That precedent is not one this Committee should leave unexamined.

2. Financial and Economic Impacts of a Proposed Phase Out

GA has addressed the financial and economic dimensions of the proposed phase out in detail across its earlier submissions and Legislative Council briefing and does not seek to repeat that material in full. The key points remain directly relevant to this Committee's inquiry and are summarised and supplemented below.

Scale of the Industry

Based on GA's 2024 Size and Scope Report and inaugural Taxation Study, the Tasmanian greyhound racing industry generated a gross economic benefit of $60.7 million, supported over 1,200 roles, delivered $34 million in household income, and concentrated 54.5 per cent of its economic activity in regional areas. It generated $15.8 million in total taxation contributions across all three levels of government against $5.4 million in government funding received, producing a net tax contribution of $10.4 million. These are not the characteristics of an industry in systemic failure.

The regional dimension of this economic contribution is important context. Trainers, breeders, veterinarians, feed and agricultural suppliers, transport operators, track maintenance contractors, and hospitality and accommodation providers in regional Tasmania all rely directly or indirectly on the industry. In communities where alternative employment and economic opportunities are more limited, the disproportionate impact of closure on regional areas is a material consideration that has not featured adequately in the Government's analysis.

The $7.5 Million Misrepresentation

There has been persistent public commentary about the level of financial support provided to greyhound racing in Tasmania. Animal welfare activists and some members of this Committee have repeatedly cited a figure of approximately $7.5 million as the annual public subsidy to the code and presented that sum as the financial benefit that would flow to Tasmanian taxpayers upon closure. GA submits that this figure is a gross misrepresentation of the net level of public support provided to greyhound racing, and that its repeated use in public debate and before this Committee amounts to a deliberately misleading characterisation of the real financial position.

As set out in the commercial revenue analysis in this section, the greyhound code generated approximately $8.4 million in direct Race Field Fee revenue in FY25 alone, an amount that exceeds the gross code funding allocation. When all revenue contributions derived from greyhound wagering are included, the code's total revenue contribution to Tasracing approaches $10 million annually. The net public subsidy, properly calculated after accounting for all revenues generated by the code, is materially lower than $7.5 million. To continue to quote the $7.5 million code funding figure as if it represents the net cost to government, while ignoring the revenues the code generates, that directly offset or exceed that figure, is to present an incomplete and misleading picture.

Greyhound racing remains the most financially viable of the three codes operating under Tasracing. The Tasracing Annual Report for FY25 shows that greyhound wagering turnover grew by 4.9 per cent to $280.5 million while Thoroughbred and Harness wagering contracted.

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Greyhounds now account for 39.5 per cent of total Tasmanian wagering turnover. For the year ended 30 June 2025, the greyhound code generated $8.4 million in total direct revenue, comprising $8.1m in domestic product (Race Field) fees and $270k in international wagering fees.

When also accounting for Point of Consumption tax derived from Tasmanians betting on greyhound racing around the nation ($1.1m), it is apparent that greyhound racing is by far the most commercially self-sustaining of the three codes.

Beyond wagering, greyhound racing generates approximately 54 per cent of Tasmania's total racing broadcast content. This volume underpins major commercial agreements including volume-based wagering sponsorship. Sponsors and broadcast partners pay for audience reach and racing volume. The removal of greyhound racing would reduce the total racing product available for broadcast and wagering by approximately half, materially diminishing the commercial value of Tasracing's relationships with wagering operators, sponsors and media partners across all three codes. These flow-on revenue effects have not been incorporated into any financial analysis presented to this Committee.

The going-concern risk to Tasracing itself must also be placed before the Committee. Since its inception, Tasracing has historically recorded comprehensive accounting losses covered by non-cash charges, meaning its ability to prepare financial statements as a going concern relies on government underwriting.

The 2012 Parliamentary Inquiry noted that Tasracing had routinely struggled to meet its core statutory objective under section 6(a) of the Racing (Tasracing Pty Ltd) Act 2009, to operate as a successful business in accordance with sound commercial practice.

Greyhound racing, as the code generating the largest direct revenue contribution, acts as the critical financial anchor that offsets this structural weakness. If that $8.4 million in Race Field Fee revenue is removed, the fixed overheads, track maintenance and core administrative costs do not disappear, they redistribute across Thoroughbred and Harness racing, permanently increasing those codes' dependence on direct Treasury intervention to maintain basic operational solvency.

The Three-Code Ecosystem

Tasmania's racing industry operates as a single integrated ecosystem rather than three separate industries. The three codes share administration and governance structures, broadcast and wagering agreements, track and venue infrastructure, technology platforms, and compliance and integrity services. This means that removing one code reduces revenue significantly while leaving much of the cost base intact. Shared costs that are currently allocated across three codes do not disappear when one code is removed; they redistribute across the remaining two, increasing the cost burden on thoroughbred and harness racing and requiring greater government intervention to sustain them.

Tasracing CEO Andrew Jenkins' evidence that Tasracing would need, at a minimum, its current funding allocation even without greyhounds confirms this dynamic. The claimed savings from removing the greyhound code's funding allocation are not realisable. The cost base does not contract proportionally with revenue. This is one of four compounding reasons why the closure of greyhound racing is more likely to produce a net deficit to the public accounts than a saving, the others being the loss of Race Field Fee revenue, the reduction in sponsorship and broadcast income, and the uncosted burden of transition administration and participant compensation.

GA is aware that Tasracing has commissioned independent economic modelling from Align Sport, led by Ben Sellenger, to examine the financial and economic impacts of the proposed phase out across all three codes. This work may address, among other matters, the revenue implications for Tasracing, the structural cost dynamics of the three-code model, and the broader economic consequences for Tasmanian racing of the removal of greyhound racing from the funding framework.

GA submits that any available modelling should be central to the Committee's review and evaluation of the financial and economic questions it has been asked to examine. Tasracing has commissioned independent analysis directly related to the matters this Committee is investigating. That analysis should be tabled, scrutinised and form part of the evidentiary record before the Committee reaches any conclusions.

The True Cost of Transition

The Premier has announced that $4.8 million has been set aside in connection with the transition. GA submits that this figure is materially inadequate, and that evidence before this Committee from Racing Integrity Commissioner Sean Carroll confirms why.

At the recent Budget Estimates hearing, Commissioner Carroll stated:

> *"....As you'd be aware , and I've raised these concerns before committees that you're Chair of and also in other chambers , as has been well documented that my office has received an allocation of $4.8 million to address the transition plan and the transition budget, to provide some guidance and advice at a high level. This budget submission covers the following costs: a working group, a feasibility study, workforce to support the transition of the phase out, veterinary care, emergency kennelling, rehoming, and compensation via Tasracing, for quarantine, race-day expenses from the reduced racing schedule. The budget covers participant welfare, rehoming, compensation considerations and once the compensation model has been established in the transition plan, there will be a further budget application for what that looks like."*

Commissioner Carroll's evidence confirms two critical points. First, the $4.8 million is not a compensation package, it is a scoping and administration budget covering working groups, feasibility studies, staffing, veterinary care, emergency kennelling and race-day operational costs. Second, no compensation model yet exists. The Government has announced $4.8 million while the Racing Integrity Commissioner has confirmed that compensation remains unmodelled and subject to a further budget application that has not been made.

New Zealand

New Zealand is the most directly comparable jurisdiction to have legislated the closure of greyhound racing and constructed a funded transition program. Its experience is instructive both for the scale of costs a responsible transition requires and for the approach taken by a government that undertook genuine financial modelling before committing to closure.

New Zealand's transition program was built around a population of approximately 1,700 greyhounds, with a rehoming throughput of around 50 dogs per month. On that basis, the modelled transition period was 34 months. Applying a daily holding cost of $36 per dog across the declining population, New Zealand's estimated direct transition cost was $26.2 million. In legislating the program, the New Zealand Government provided an income stream equivalent to approximately $125 million over five years to cover the full range of expected transition and compensation costs, including care, rehoming, participant compensation, administration, and contingency provisions.

GA notes that this commitment was not made in response to industry demands, it was what New Zealand legislators determined was necessary to meet the obligations created by a government-initiated closure.

GA also notes that New Zealand legislators cited the industry's failure to implement sufficient welfare improvements as the principal reason for acting. That is not the position in Tasmania, where welfare outcomes have improved consistently over eight years. That distinction is material to both the justification for closure and the scale of obligation a closure would impose.

Estimated Transition Costs for Tasmania

Applying the New Zealand methodology to Tasmanian-specific parameters, and on the most optimistic assumptions available, produces the following model.

Key Assumptions

- Initial population requiring placement: 1,000 greyhounds
- Combined rehoming rate: 150 dogs per year
- Tasracing Greyhound Adoption Program (GAP): 100 dogs per year (based on GAP historical average)
- Third-party rehoming organisations (RSPCA, Dogs Home and others): 50 dogs per year (50% uplift on GAP average)
- Daily care rate: $36.00 per dog
- Project duration: 6.7 years (80 months)

Important caveat on third-party rehoming capacity: The 50 dogs per year attributed to third-party organisations is unverified. Organisations including the RSPCA and Dogs Home have publicly pledged support, but none has provided a quantified placement commitment or demonstrated capacity to absorb greyhounds at scale alongside existing shelter populations.

The 150 dogs per year combined figure should be understood as an optimistic ceiling, not a confirmed throughput. If third-party capacity does not materialise as assumed, the transition period extends and costs increase proportionally.

Rehoming Financial Projections

Total project duration: 80 months (6.7 years)

Average population during transition: 500 dogs

Total dog-days in care: 1,217,000 days

Total estimated direct care cost (@ $36/day): approximately $43.8 million

Annual Cost Profile

Year	Average Dogs in care	Estimated annual cost
Year 1	925	$12.2 million
Year 2	775	$10.2 million
Year 3	625	$8.2 million
Year 4	475	$6.3 million
Year 5	325	$4.3 million
Year 6	175	$2.3 million
Year 7	54	$0.3 million
Total		**$43.8 million**

Comparative Analysis: Tasmania vs New Zealand

Even on these optimistic assumptions, the modelled direct care cost for Tasmania is approximately $43.8 million over 6.7 years, approaching New Zealand's $26.2 million despite managing 40 per cent fewer dogs. The reason is throughput: New Zealand placed dogs at 50 per month; Tasmania at its combined optimistic capacity places 12.5 per month. The consequence is a transition that takes twice as long and accumulates care costs accordingly.

The assumed additional capacity of 50 greyhounds per annum from third-party organisations should be regarded as aspirational rather than demonstrated. No organisation has quantified its placement commitment, verified kennel space, or confirmed staffing and funding to sustain intake at scale over multiple years. If that capacity does not materialise, the transition period extends and costs increase materially above $43.8 million.

Costs Excluded from the Direct Care Model

These estimates cover direct daily care only. They exclude:

- Veterinary treatment and desexing
- Transport and logistics
- Behavioural assessment and rehabilitation
- Staffing and administration
- Facility establishment and operating costs
- Foster care support
- Compliance and animal welfare oversight
- Contingency provisions for dogs unable to be rehomed within forecast timeframes

A realistic whole-of-program transition cost could reasonably approach $50 million over the life of the transition, depending on actual rehoming capacity achieved and program duration. This estimate does not include participant compensation, which Commissioner Carroll confirmed at Budget Estimates remains unmodelled and subject to a further budget application. The $4.8 million announced does not cover care costs. It does not cover compensation. It covers the administrative scaffolding around a transition program whose actual cost no one has yet quantified. New Zealand legislated the equivalent of approximately $125 million over five years for a larger population. The gap between what has been announced in Tasmania and what a responsible transition will cost is an issue this Committee should place squarely before the Parliament.

3. Animal Welfare Impacts

Animal welfare has been the primary public justification for the proposed phase out. GA's earlier submissions set out in detail why the available evidence does not support that justification. This section summarises the key points and identifies where the Bill would in fact produce worse welfare outcomes than continuation of the regulated industry.

Australia's International Regulatory Standing

Australia remains one of only five countries in the world that conduct legislated, regulated professional commercial greyhound racing, alongside New Zealand, the United Kingdom, Ireland and the United States. These jurisdictions operate under formal legislative frameworks encompassing licensing, integrity oversight, welfare regulation and structured rehoming programs. This small group of regulated nations is formally recognised through the Greyhound Passport Program administered by Greyhounds Australasia, which permits the international movement of racing greyhounds only between those regulated jurisdictions, precisely because equivalent standards of traceability, veterinary oversight and welfare accountability can be assured.

By contrast, greyhound racing is reported to occur in more than 20 other countries, frequently in informal or unregulated settings where there is little or no publicly available information about welfare oversight, regulatory control, or traceability. Activist organisation GREY2K USA Worldwide, which opposes commercial greyhound racing, whose presence on the international stage is well known and to the members of this Committee highlighted on its website, explicitly acknowledges that non-commercial or unregulated dog racing occurs in at least 21 countries, and does not take a position for or against such non-commercial dog racing.

This is a significant admission. The welfare considerations that underpin the case for closure in Tasmania, transparency, veterinary reporting, breeding regulation, mandatory retirement protocols and desexing, Studbook traceability, are precisely the standards that do not exist in those 21 unregulated jurisdictions. GREY2K's position exposes the selective application of the welfare argument: it is directed at the world's most regulated jurisdictions while remaining silent on the unregulated majority.

Much has also been made of recent decisions in Wales and Scotland to move away from greyhound racing. The context of those decisions warrants examination.

Scotland has not had an operational licensed greyhound racing track for a number of years; the Scottish decision to formalise a prohibition is therefore more a legislative application of an already-absent industry than a meaningful regulatory intervention in an active one.

Wales has only one operational venue and, at the time of this submission, the Welsh transition remains without a formal framework. A transition committee has been established but no plan, no timeline, no welfare protocol and no compensation mechanism is in place. In that respect, Wales provides a cautionary parallel to Tasmania rather than a model to emulate.

Both the Welsh and Scottish decisions have been characterised, including by participants and observers within those jurisdictions, as driven primarily by political convenience rather than by specific regulatory failure or evidence of welfare deficiencies particular to greyhound racing. Neither decision was preceded by a Regulatory Impact Statement, an independent welfare audit, or a demonstrated failure of the existing regulatory framework. They are therefore not precedents that carry weight as evidence-based policy and should not be presented to this Committee as such.

Australia's regulated system places it among the leading jurisdictions globally in terms of oversight, welfare standards and integrity systems. The industry continues to work with governments and regulators across all states and territories to strengthen regulation, improve animal welfare outcomes, support rehoming programs for retired greyhounds and deliver community confidence.

To close greyhound racing in Tasmania, and in doing so remove the code from the regulated, traceable, welfare-accountable framework that distinguishes Australia's system from those 20-plus unregulated alternatives, is to make greyhounds less visible, not more protected. GA's earlier submissions document in detail how the Bill's unregulated breeding provisions would produce precisely this outcome.

Welfare outcomes in Tasmanian greyhound racing have been improving consistently. The FY25 total injury incidence rate of 23.39 per 1,000 starters is the lowest in a decade.

Euthanasia rates for exiting greyhounds have fallen from 43 per cent in FY17/18 to 15 per cent in FY24/25. There has been only one substantiated animal welfare breach since 1 February 2025, from approximately 300 kennel audits and inspections. Claims made in public advocacy, including that 279 greyhounds were killed or injured while racing last year, misrepresent data that in fact demonstrates ongoing and measurable improvement.

It is also important to place the nature of greyhound racing injury reporting in its proper context. The comprehensiveness of injury data in greyhound racing is a product of the rigour of the industry's welfare framework, not evidence of a welfare crisis. Every post-race veterinary observation is recorded and published, from minor abrasions and split foot pads through to significant injuries, because racing greyhounds are subject to mandatory veterinary inspections before and after every race meeting. More than 80 per cent of reported injuries are classified as minor, with a stand-down period only, and would not prompt a visit to a vet if sustained by a domestic pet. They are recorded because the integrity of the wagering product demands that every racing dog is certified fit to compete, and because the industry has built transparent, accountable oversight systems to ensure that standard is met. The depth of injury reporting in greyhound racing is a mark of the framework's strength, not its failure. By contrast, injury data for most other animal sports and activities is not collected or publicly reported at all.

Claims of a ‘breeding explosion’ are equally unsupported. With one week remaining in the financial year, metrics demonstrate only a slight increase in litters and pups from FY24/25 figures. Whereby, FY26 has delivered 26 litters (25 in FY25) and 161 pups (155 in FY25), well below the five-year average of 30 litters and 186 pups.

The Bill's principal welfare risk is the unregulated breeding gap it creates. Under GA Rule 24 and its Tasmanian Local Rule equivalent, every greyhound exiting the industry as a pet must be surgically sterilised before leaving the care of a licensed participant.

The Bill dismantles this protection by permitting unregulated pet-only breeding while removing the framework under which sterilisation is mandated. Greyhounds bred outside the regulated system carry no DNA profile, appear in no Studbook, and are invisible to every welfare and traceability mechanism the industry has built. Criminal sanctions will deter those already operating within the licensed system, precisely the people who do not need to be deterred. They will not deter those operating outside it, including those with commercial incentives to source greyhounds for offshore racing markets where demand is documented.

GA also draws the Committee's attention to the lure coursing issue identified in its supplementary submission. From 1 July 2029, the Bill would make it an offence for greyhounds to pursue a mechanical lure in any context, while identical activities by border collies, whippets and other sighthounds remain entirely lawful. There is no animal science basis for this breed-specific prohibition. The Minister has implicitly acknowledged the problem by indicating future regulations may be needed to correct unintended consequences. The right of a retired greyhound to engage in recreational lure coursing should be protected on the face of the legislation.

4. The Future of the Tasmanian Racing Deed

The Committee has been asked to examine the future of the Tasmanian racing Deed. This is a question of genuine and significant importance for the long-term sustainability of the entire Tasmanian racing industry, and one that deserves careful analysis on its own terms, separate from the question of whether greyhound racing continues. GA's submission on both dimensions follows.

Any restructuring of the Deed that removes or diminishes greyhound racing's position within it would effectively achieve by administrative means what the Bill has been unable to achieve through Parliament. The Deed is the commercial and regulatory instrument through which Tasracing fulfils its obligations to all three racing codes. Greyhound racing currently generates approximately 39.5 per cent of total Tasmanian wagering turnover and in excess of $8 million in product revenue (Race Field Fees) annually. Removing the code from the Deed would not eliminate these financial realities. It would create a circumstance in which Tasracing receives government funding premised on managing three codes while having the commercial base of one stripped away by administrative action.

GA submits that this approach is not consistent with Tasmania's existing legislative framework, or with the rights of participants who have operated in good faith within a licensed and regulated industry. Any examination of the Deed's future should proceed on the basis that all three codes continue to be supported unless and until Parliament legislates otherwise.

The current Tasracing funding Deed has been a source of structural concern since its inception. Established in 2009 to facilitate the privatisation of TOTE Tasmania, it was designed with the 2009 sale price in mind, not the one achieved some two years later in late 2011. The Government of the day elected to prioritise the sale price, in lieu of the imposition of industry funding obligations on the retail totalisator operator, which was Tattersalls at the time.

A 2012 Parliamentary Inquiry identified fundamental weaknesses: funding was not tied to industry performance, Government had assumed financial risks previously carried by industry-generated revenue, and there were no incentives for commercial growth or efficiency.

Those weaknesses have not been meaningfully addressed by successive governments, which have instead offered assurances of renewal without tackling the underlying structural flaws. The Deed's approaching expiry in June 2029 is therefore not simply a contractual milestone; it is the long-deferred moment at which the inadequacies of a model must be confronted.

The failure of successive governments to address these structural concerns has imposed costs on Tasmanian taxpayers that a properly designed, performance-linked model would have diminished. GA submits that the Committee has an opportunity to recommend that this pattern not be repeated in the post-2029 framework, and that the answer to those failings is not to further weaken the industry by excommunicating its most commercially productive code, but to build a framework in which all three codes contribute to reducing taxpayer exposure through commercial performance and alternate funding arrangements.

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Isolating One Code Jeopardises the Whole

The Racing Regulation and Integrity Act 2024, passed with overwhelming parliamentary support, was built on the premise that all three codes operate within an integrated regulatory and commercial ecosystem. The integrity framework, the welfare standards, the licensing architecture, and the governance structures enacted in that legislation apply across the industry as a whole. That is the foundation on which public confidence in Tasmanian racing rests.

To now isolate and excommunicate one code from that framework, whether through legislation that has stalled in Parliament or through administrative action that circumvents it, jeopardises the integrity of the whole. Racing's social licence depends on the credibility of its governance. A regulatory framework that can be selectively applied, or whose protections can be stripped from one code by executive action, is not a credible framework. The damage to confidence in the administration of the remaining two codes would be real and lasting. GA submits that the 2024 reforms were the right response to the industry's challenges, and that they should be allowed to demonstrate their effect across all three codes, as was the overwhelming parliamentary intent when they were passed.

Meaningful negotiations about a new post-2029 Deed framework are impossible while the future structure of the industry remains unresolved. No commercial partner, no infrastructure investor, and no government agency can plan effectively against an industry footprint that may or may not include one of its three codes. The current legislative limbo is not only causing uncertainty for participants, but also actively preventing Tasracing from undertaking the strategic work the industry must do before 2029, and creating unacceptable risk of asset impairment at shared, multi-code facilities.

Principles for a Post-2029 Funding Framework

GA submits that a reformed funding framework for the post-2029 period should address the structural failures that have characterised the current model and should be built around the following principles.

- **Step change to Performance-linked funding.** Future government support should be linked to a stepped change focussed on promoting measurable commercial outcomes, wagering growth and return on investment, creating incentives for efficiency reducing the passive reliance on Treasury allocation.
- **Government funding focussed on welfare and integrity.** Continuation and strengthening of welfare, compliance and integrity systems maintaining the governance standards on which racing's social licence depends.
- **Revenue growth across all three codes.** Maximising Race Field Fee revenue, wagering returns and commercial sponsorship opportunities to fund commercial racing expenditure (e.g. prizemoney and club funding) progressively through the deed, with the three-code structure retained as the essential foundation of commercial attractiveness and efficiency.

- **Independent economic assessment.** Commission a forward-looking, independent economic assessment focused specifically on financial modelling for a post-2029 performance-linked Deed that works over its duration to fulfil the 2012 parliamentary recommendation to tie funding directly to performance and return on investment.

The retention of all three codes is a prerequisite for achieving the commercial scale and revenue diversity that a financially independent industry requires.

A two-code Tasracing, operating without greyhound racing's $8.4 million in direct Race Field Fee revenue and approximately half its current broadcast content, would be a structurally weaker commercial entity, more dependent on government funding, less attractive to commercial partners, and further from the long-term goal of reduced taxpayer exposure than it is today. GA urges the Committee to recommend that whole-of-industry consultation between Government, Tasracing, and representatives of all three codes commence immediately to draft a modernised, commercially driven successor agreement ahead of the 2029 horizon.

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Conclusion

GA respects the Committee's mandate and welcomes the opportunity to provide this submission. The position GA has maintained across its earlier submissions, supplementary submission, and Legislative Council briefing is consistent: the decision to phase out greyhound racing in Tasmania was not the product of a fair, transparent or evidence-based process, and the Bill as drafted contains structural deficiencies that would undermine the welfare and transition outcomes it purports to achieve.

The Committee now finds itself examining the impacts of a phase out whose legislative vehicle is in limbo, while the Government explores administrative alternatives that would circumvent the parliamentary process. GA submits that the most important contribution this Committee can make at this stage is to recommend clearly that the Bill's status be resolved, that Parliament either progress it to a vote or withdraw it, and that no administrative steps be taken through defunding or Deed restructuring to prejudice the position of greyhound racing while that resolution is pending.

The financial analysis in this submission demonstrates that the claimed savings from closing greyhound racing do not withstand scrutiny, that transition costs are orders of magnitude larger than the Government has acknowledged, and that $4.8 million covers only the administrative scaffolding of a program whose actual cost has not been modelled. The animal welfare case for closure is contradicted by the industry's own performance data. And the risk of administrative action outside the legislative framework, whether through defunding or Deed restructuring, raises serious questions about legal compliance and governance integrity that this Committee is well placed to examine.

The more important long-term question, irrespective of the Bill's outcome, is the design of a commercially driven, performance-linked funding framework for the post-2029 period that progressively reduces government dependence while maintaining the three-code structure that underpins the commercial viability of Tasmanian racing. GA welcomes engagement with the Committee on that question and urges that it is not deferred while the current legislative uncertainty continues.

GA representatives remain available to appear before the Committee and to provide any further information that would assist its work.

[redacted]

Simon Stout
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Greyhounds Australasia