



Greyhounds Australasia Submission

**The Parliament of Tasmania
Joint Select Committee on Greyhound Racing
in Tasmania**

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1.0 About Greyhounds Australasia

Greyhounds Australasia (GA) comprises representatives from jurisdictional controlling bodies in Australian States and Territories, and New Zealand (the GA Directors).

The charter of GA is to support these jurisdictions via encouragement of a holistic approach to the Australasian greyhound racing industry.

GA provides its stakeholders with value-added services and industry practices that support integrity and sustainability and which maximise returns while keeping greyhound welfare at the centre of all decisions.

By reason of the State/Federal political system, each controlling body administers greyhound racing within its own jurisdiction, with GA being the support arm to enable national consistency and uniformity wherever possible.

A number of committees provide recommendations for the consideration of the GA Board including:

GA Welfare Working Party, responsible for the implementation of the National Welfare Strategy, which was endorsed by the GA Board in May 2014.

GA Rules and Integrity Committee, responsible for recommending new and amended national greyhound racing rules (GARs) to protect and enhance the integrity of the industry and the welfare of greyhounds and other animals.

GA Veterinarians & Analysts Committee, responsible for advising the GA Board on matters related to prohibited substances and their detection, research eligible for GA's financial support, breeding related matters, analytical issues, greyhound and other animal welfare matters, integrity matters, disease and quarantine issues. They provide expert opinion where rules regarding welfare and or prohibited substances are being discussed.

GA Racing Committee, responsible for advising the GA Board on matters including the AGRA Group Race Calendar, prize money and funding policies.

The National Integrity Conference, where Chief Stewards from each controlling body of Australia and New Zealand meet twice a year, instigates the process of bi-annual national rule changes and makes recommendations on other regulatory matters affecting, or likely to affect, controlling bodies. Matters arising from this conference are routinely considered by the relevant GA committee before recommendations for regulatory change are put to the GA Board.

Tasracing is an effective contributor on all GA committees. Tasracing representatives demonstrate a consistently strong desire to harmonise rules, policies, strategies and other actions across all jurisdictions wherever possible, believing that participants from all jurisdictions benefit from a collaborative approach to decision making.

Tasracing CEO Dr Eliot Forbes is a highly effective GA Director and member of GA's Veterinarians & Analysts Committee. He displays a strong bias towards the welfare of the greyhound in all discussions and provides a unique all codes governance perspective to GA decision making.

2.0 GA's animal welfare role

The Australasian greyhound industry has been focused on greyhound welfare since the establishment, in 1996, of the first industry funded greyhound adoption program in Victoria. National standards of care are considered some of the best in the world and reflect state and local government laws and regulations.

Since 1975, the number of greyhound litters whelped for racing has declined by over 50 per cent and by over 11 per cent since 2000. Despite that progress, GA accepts that there are far too many greyhounds being euthanased unnecessarily and that a significant contribution to this problem is that there are many more greyhounds being bred than are required to fill current race meeting requirements.

The industry is extremely aware that the welfare of its racing animals, before, during and after their racing careers, is of paramount importance. In May 2014, the GA Board endorsed the National Greyhound Welfare Strategy. In an historic moment, representatives from all Australian states and territories, including Tasracing, agreed on uniform standards of care, education, accountability and enforcement to ensure the best possible outcome for greyhounds at every stage of their lifecycle. The strategy is one year into its three year implementation.

Specifically, the strategy will result in:

- 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 controls over breeding regulation and the promotion of more responsible breeding practices
- A requirement that all greyhounds are 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 all greyhound properties
- A star rating system for all greyhound facilities at which greyhounds are housed during their lifecycle
- A tiered system of trainer licence types which will stipulate how many greyhounds a trainer can train
- Ongoing enhancements to each state's Greyhound Adoption Programs to maximise the re-homing opportunities of all retired greyhounds
- New measures to maximise racing opportunities and ensure all greyhounds have the ability to reach their true potential

Within the first nine months of implementation, agreement had been reached on improved greyhound vaccination and breeding controls with new national rules ready for introduction on 1 July 2015. In addition, trainer education content has been drafted, new trainer licence categories approved and preparations for licencing all owners, breeders, whelpers, rearers, breakers and educators are well advanced.

In May 2015, GA reviewed the National Greyhound Welfare Strategy and determined to significantly increase the focus on reducing breeding volumes and re-homing more greyhounds through industry Greyhound Adoption Programs (GAP). As a result, GA developed a "Towards Zero Euthanasia" framework that has received strong support from all jurisdictions including Tasmania.

“Towards Zero Euthanasia” describes the most significant challenge facing the greyhound racing industry and identifies the levers available to controlling bodies to significantly reduce the number of greyhounds whelped and significantly improve the number of greyhounds successfully re-homed.

It is anticipated that all controlling bodies, including Tasracing, will use a combination of the following to limit the humane euthanasia of greyhounds to circumstances where this is the last and only option:

- Significantly increase breeding related fees and direct funds to industry adoption programs (GAP)
- Licence all racing greyhound service providers (whelpers, rearers, breakers, educators) and their properties, in addition to trainers and their properties, to optimise greyhound tracking
- Mandate the following to secure participant licence renewal:
 - satisfactory completion of owner, trainer, breeder, whelper, rearer, breaker and educator education
 - Satisfy a compliance team audit of the licenced participant’s property
- Remove Breeder Incentive Schemes and direct funds to GAP
- Introduce a mandatory re-homing requirement of all owners
- Remove participant fees to enter a greyhound into GAP
- Establish satellite GAPs to improve owner/trainer access to the program
- Engaging and redeploy current trainers to manage the satellite GAPs
- Launch a national GAP to more effectively communicate the benefits of greyhound pet ownership, access to adoption opportunities, and national standards of program care and responsibility
- Review current prizemoney and redistribute funds into an expanded GAP

3.0 Building the industry’s social licence to operate

GA understands the value of having not just a legal licence to operate but also a social licence to operate.

GA’s recent leadership in the critical areas of greyhound welfare and industry integrity stems from the Board’s commitment to expanding its influence from its traditional areas of annual national rule changes, greyhound naming, DNA kit distribution, frozen semen insemination database management and production of the industry’s stud book.

In the second half of 2014, before the Four Corners program “Making a Killing” aired, GA researched internal and external stakeholder perceptions of the Australasian greyhound industry and identified the most significant issues facing the industry based on the gap that existed between stakeholder expectations of industry performance and their perception of industry performance.

The research identified that there were two contributors to reputation risk to the industry – the technical risks (or hazards) and the outrage (or emotional reaction) to industry events. The hazards were the tangible evidence of welfare and integrity measures such as the quality of kennels, compliance regimes, the drug testing program, licencing policies and the design of race tracks. The research identified that the industry was reasonably well advanced in identifying and managing these hazards. The research found that the industry was less well advanced in its capacity

to identify and manage the outrage triggers. It found that stakeholders had, and were likely to have, very significant and negative emotional responses to a perceived lack of industry responsiveness, trust and certainty.

Dr Forbes was one of nine GA Directors interviewed for this study.

GA Directors identified the following as the industry's key issues:

1. Disposal of pre-raced racing greyhounds
2. Disposal of retired greyhounds
3. Perception of race fixing/doping
4. Injuries to greyhounds
5. Perception of criminal activity
6. Exports of Australian greyhounds

GA Directors did not identify live baiting as in the top six industry issues and the Board and management were deeply shocked when evidence to the contrary emerged.

Highly involved external stakeholders (animal rights and welfare groups and social welfare groups) identified the following as the industry's key issues:

1. Perceptions of race fixing/doping
2. Injuries to greyhounds
3. Disposal of pre-raced greyhounds
4. Disposal of retired greyhounds

Animal rights and welfare groups did not identify live baiting in its top four industry issues.

The community identified the following as the industry's key issues:

1. Responsible gambling
2. Disposal of pre-raced greyhounds
3. Training conditions
4. Living conditions

The community did not identify live baiting in its top four issues.

Animal welfare was identified as by far the most significant industry issue with the potential for animal rights and welfare groups driving negative reputation for the industry through triggering moral outrage in the public over issues such as the volume or methods used to discard dogs.

GA Directors believed that the biggest gaps between its expectations of itself and how it rated its performance were on the issues of disposal of pre-raced greyhounds, the disposal of retired greyhounds and the exportation of Australian greyhounds.

Those external stakeholders most highly involved in our industry believed that we were furthest away from meeting their expectations on the matters of export and living conditions. These stakeholders believed the industry should be attaining perfect or near perfect performance on both of these matters.

The community had relatively low expectations of the industry in comparison with the industry's own expectation and those of highly involved animal welfare, animal rights and social welfare groups. The biggest gaps were on the issues of disposal of pre-raced greyhounds and export.

The study, completed in December 2014, noted the potential for community shock and significant outrage if NGOs successfully targeted the industry and highlighted certain facts with graphic images in the way that occurred with live export.

The absence of live baiting as a significant issue for the industry to manage may be put down to a lack of evidence that the practice existed both from within controlling bodies (as reflected in the responses of the GA Directors who are either controlling body Chairs or CEOs) and outside the industry including those most highly involved in our future – the animal rights and welfare groups.

Building on this research, and on the back of evidence that live baiting exists, or has recently existed, in the industry, GA has helped controlling bodies plan their industry recovery strategy designed to restore public and government confidence and build its social licence to operate. The key components of those plans are:

1. Changing the industry culture to one of respect (for all animals, authority and each other)
2. Committing to a significant program of reform that eradicates live baiting and eliminates the unnecessary euthanasia of greyhounds
3. Building credibility (by generating reform agreements with our most significant critics)
4. Establishing and committing to a national industry vision
5. Aligning industry participants on the case for change
6. Improving transparency (by publishing animal welfare performance against metrics agreed to by those same critics and government)
7. Keeping the public and governments informed of progress

4.0 New National Lure Rules

In media interviews during and immediately following the Four Corners program that showed evidence of live baiting in Victoria, New South Wales and Queensland, the GA CEO Mr Scott Parker advised that GA would be reviewing all national and local lure related rules and penalties.

That review took place immediately and with effect on 30 April 2015, new national rules have been in place that:

- Allow a person to only use or have in their possession at any place where greyhounds are, or are to be kept, trained or educated or prepared to race, or racing, a lure that is approved by the Controlling Body
- Impose a penalty of not less than 10 years disqualification and a fine of a sum not exceeding such amount as specified in the relevant Act or Rules
- Impose a penalty of not less than five years disqualification and up to \$20,000 for any person who witnesses but fails to report the use of a lure contrary to the rules to their controlling body

See Appendix A for the full new national lure rules (GARs)).

5.0 Tasracing's support of national uniformity

Tasracing's greyhound racing model operates quite differently from other racing jurisdictions and together with its small size, offers a unique point of view on important matters of debate within GA. With training and venues supervised by Tasracing staff or club officials, it is able to offer an educated and consistent external perspective on industry challenges while always appreciating that other jurisdictions may face significantly greater complexity in overcoming those same challenges.

The Australasian greyhound racing industry operates without borders such that a greyhound can be racing in one jurisdiction one week and another jurisdiction the next. The confidence and trust in racing authorities is optimised by participants relying on one set of rules wherever possible.

Tasracing understands the importance of generating participant support to achieve industry alignment with change including national greyhound racing rule uniformity. The Tasracing participant consultation model is one of the best in Australia and discussions within it are routinely referred to by Tasracing representatives in GA forums and seen as a valuable guide to likely participant reaction to proposed change.

Tasracing always seeks to cooperate with other GA members in articulating the industry's welfare and integrity challenges and finding solutions that seek to benefit all participants, not just Tasmanian participants.

GA appreciates that Tasracing relies on the provision of resources from Racing Services Tasmania to commit to nationally consistent rules, policies and strategies and the task of negotiating the necessary outcomes with that body to enable Tasmanian greyhound racing to benefit from its controlling body's participation in the national debate on significant matters.

Tasracing is an extremely valuable member, providing a consistent, influential voice from a unique perspective that often improves outcomes. Tasracing's commitment to greyhound racing integrity and the welfare of the greyhound and all animals is beyond question and GA is proud to support its Board, CEO and team with this submission.

Appendix A

New Lure GARs effective 20 April 2015NEW RULES

R86A Approved types of Lures (approved by GA Board 27/3/15)

A person shall only use or have in their possession at any place where greyhounds are, or are to be kept, trained or educated or prepared to race, or racing, a lure that is approved by the Controlling Body.

R86B Offences Relating to Luring and Baiting

- (1) A person who, in the opinion of the Stewards or Controlling Body-
 - (a) uses in connection with greyhound training, education or preparation to race, or racing, any live animal, animal carcass or any part of an animal whether as bait, quarry or lure, or to entice, excite or encourage a greyhound to pursue it or otherwise; or
 - (b) attempts to possess, or has possession of, or brings onto, any grounds, premises or within the boundaries of any property where greyhounds are, or are to be trained, kept or raced, any live animal, animal carcass or any part of an animal for the purpose of being, or which might reasonably be capable of being, or likely to be, used as bait, quarry or lure to entice or excite or encourage a greyhound to pursue it; or
 - (c) causes, procures, permits or allows a greyhound to pursue or attack any live animal, animal carcass or any part of an animal;
 - (d) fails to use reasonable endeavours to prevent a greyhound pursuing or attacking any live animal, animal carcass or any part of an animal; or
 - (e) is in any way directly or indirectly involved in committing, or is knowingly concerned with, such conduct as set out in (a), (b), (c) or (d) of this Rule; or
 - (f) aids, abets, counsels or procures any person to commit such conduct as set out in (a), (b), (c) or (d) of this Rule; or
 - (g) is convicted in any Court of an offence in relation to the use of, or having in their possession, any live animal, animal carcass or part of an animal in connection with greyhound training, education or preparation to race, or racing

shall be disqualified for a period of not less than 10 years and, in addition shall be fined a sum not exceeding such amount as specified in the relevant Act or Rules, unless there is a finding that a special circumstance exists, whereupon a penalty less than the minimum penalty may be imposed.”

- (2) A person who witnesses conduct as set out in (1)(a), (1)(b), 1(c), or 1(d) above but fails to report that conduct to the Controlling Body as soon as reasonably practicable shall be disqualified for a period of not less than 5 years and/or fined a sum not exceeding twenty thousand (\$20,000) dollars.

R86C Reporting and other matters

- (1) For the purposes of Rules 86A to 86C:
‘training’ shall include, in addition to those activities otherwise defined as ‘training’ in the Rules, any activities whereby a greyhound is exposed to any item for the purpose or effect, or that would have the likely effect, of enticing, exciting or encouraging it to pursue, entice or excite, or that causes such reaction from a greyhound.

- (2) Where any officer, employee, member, visitor or contractor of a Club has knowledge of, or suspects, an offence may be occurring contrary to Rule 86A or Rule 86B on any ground under the control or management of a Club, that Club shall report the matter forthwith to the Controlling Body. A failure to do so may result in the licence of that Club being cancelled, either for a specified period or permanently, and the Club may be penalised pursuant to these Rules.
- (3) Where any manager, employee, member, visitor or contractor has knowledge of, or suspects, an offence may be occurring contrary to Rule 86A or Rule 86B on any ground under the control or management of a licensee or manager of a greyhound trial track or greyhound training facility, the trial track or training facility manager shall report the matter to the Controlling Body forthwith. A failure to do so may result in the registration of the track or facility and of any person concerned with the management of that track or facility being cancelled, either for a specified period or permanently, and any such person may be penalised pursuant to these Rules.
- (4) Any person penalised under Rule 86A, Rule 86B or Rule 86C (or any equivalent Rule) in any jurisdiction shall not be entitled to make any application to the Controlling Body for any licence or registration or to be an owner of any registered greyhound.
- (5) A person shall not be in breach of Rule 86B(1)(b) where the animal is kept on or at the premises as a domesticated pet or is kept for rural or agricultural purposes with prior notification to and approval from the Controlling Body. For the purpose of this sub-rule, notification must be in the manner and form required by the Controlling Body for this exclusion to apply.
- (6) Nothing in Rule 86B or Rule 86C serves to create an offence in association with the normal, routine feeding of meat to greyhounds, provided that such source of feed has been obtained in accordance with all applicable legislation and regulations relating to the acquisition of such food items and the welfare of the animals involved and is not being or intended to be used for any other purpose.
- (7) For the purposes of this Rule, an animal shall be deemed to include any bird.

Replace definition of 'lure' with the following

"lure" means any item, natural or man-made, that is used in any way, by any person with the intention or effect of encouraging or inciting a greyhound to pursue, attack or excite it by responding to such stimuli, and 'quarry' and 'bait' shall have a similar meaning.

AMENDED RULES

R86 (ad) "unless authorised by stewards or Controlling Body, keeps on or brings onto a racecourse or trial track or training track or facility or a surrounding area, as defined by a Controlling Body, a live animal other than a greyhound"

R86 (af) "uses an animal for any purpose connected with greyhound racing or training in a manner which amounts to maltreatment of an animal or is improper or illegal"