Your details
First name: 
Last name: 
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
I agree with this as long as the reports don’t fall under the freedom of information act!
Registration of greyhounds, industry participants, trial tracks:
I agree All, OWNERS, Trainers and trail tracks should be licensed as we are now.
I do not believe Muscle men or Vets should have to be licensed for trainers to use them. No matter if vets or muscle man are licensed trainers will still use their favourite ones.
Registration of greyhound racing clubs:
Yes all race clubs should be licensed. But I also believe GRNSW should run all race clubs. Not private companies
Penalties:
Yes I fully agree. Should have set out fines.
I don’t feel that GWIC should share any private information of trainers. Or owners that could fall into the wrong hands. I believe licensed trainers should have to provide an updated police check every two years when licensing is due. Harsher penalties should be handed down to those being caught
Other issues:
Privacy & confidentiality
Publication of your details:
Publish my submission but do not publish my name
Acknowledgement:
I agree to the above statement.
Dear Review,

The review is strongly supported with the following procedural comments and amendments.

**Realistically, the revolutionary nature of the focus on welfare and the construction of the Greyhound Racing ACT 2017 and the subordinate legislation under the regulations will attract a large range of amendments overtime. I support amendments being sought at the beginning of the review as being more cost productive than facing amendments later.**

There is concern amongst people that whatever is decided will be locked in legislation for a long period so I think that peoples anxieties would be lessened if the process involving subordinate legislation was included in the initial information.


Where licensing has been extended to 3 years it is recommended that the period be extended to 5 years. Reason most sponsors ask for 5 year periods. 1 year to make the mistakes, 1 year to fix the mistakes , 1 year to recover costs, 2 years to get the full benefit.

**Annual report of GRNSW needs to be expansive. There is a need for subordinate regulation written by the Commission to guarantee a comprehensive report and budget reporting guidelines.**

The review needs to explain why the recommendation for further greyhound participants does not include vets or welfare organization people caring for greyhounds.

The review needs to write subordinate legislation with regards to privacy rules associated with the release of information to prescribed receivers. There appears to be a misuse of information damaging to participants of greyhound racing on the internet sites.

Cheers, John Tracey 29th June 2019.
GREYHOUND RACING REGULATION 2019 (PROPOSED REGULATION)
SUBMISSION BY
THE COALITION FOR THE PROTECTION OF GREYHOUNDS

Introduction
The proposed Greyhound Racing Regulation 2019 (Proposed Regulation) is made to provide updated legislative support and administrative detail for the Greyhound Racing Act 2017 (the Act). Interested organisations and individuals have been invited to provide a submission on any matter relevant to the Proposed Regulation. The following submission is made by the Coalition for the Protection of Greyhounds (CPG).

Concern
Clause 8 of the Proposed Regulation specifies when a greyhound is to be registered. The CPG is concerned that the Proposed Regulation contains no provision for the Greyhound Welfare and Integrity Commission (GWIC) to track and monitor the welfare of a greyhound throughout its entire lifecycle once it has been transferred from the racing register to the companion animal register.

The Proposed Regulation enables industry participants to ‘retire’ greyhounds no longer required by the industry and register the greyhound as a companion animal. Once registered as a companion animal the Proposed Regulation will enable the owner of the newly registered companion greyhound to euthanise the greyhound.

While it is generally understood that the GWIC will track and monitor greyhounds on the greyhound racing register the CPG seeks a Regulation that specifies that the GWIC must also track and monitor greyhounds registered as a companion animal under the Companion Animals Act 1998.

The CPG believes that this lack of tracking and monitoring of greyhounds registered as companion animals is not in the best interest of greyhound welfare. It is also noteworthy that this is contrary to Recommendations 73 and 79 of the Greyhound Industry Reform Panel, both of which were accepted by the Government.

Greyhound Industry Reform Panel
The Greyhound Industry Reform Panel made the following recommendations:

Recommendation 73. A new greyhound racing register should be established and managed by the integrity commission to capture the identity and whereabouts of all greyhounds through their lifecycle. (Bolding by CPG).

Recommendation 79. Owners of greyhounds should be principally responsible for the welfare of their greyhounds for their full natural life including ensuring their suitability to be rehomed at any stage of their lives. (Bolding by CPG).
The Reform Panel stated:

“McHugh found that whole of lifecycle registration was important for permanent identification, tracking change of ownership and overall lifetime care. He concluded that the lack of transparency had been an unfortunate feature of the industry and that there was a lack of certainty about requirements for greyhounds no longer registered to race.

We recommend the integrity commission be required to administer a registration scheme covering all greyhounds in the industry for their entire lifecycle. The proposed new racing register, together with the new licencing scheme, will enable increased oversight by the new integrity commission and improve the data available about euthanasia rates, bred to race ratios and transfers interstate which will help inform future improvements to animal welfare.

The new registration scheme will be updated by breeders when greyhounds are microchipped at 12 weeks, and registered owners for all other stages of a greyhound’s life, including when it is reared, educated, trained, retires from racing or when it is deceased.”

The CPG Position

The CPG supports recommendations 73 and 79 of the Greyhound Industry Reform Panel. These recommendations support the position that the GWIC track greyhounds for their entire lifecycle. The Proposed Regulations do not provide for this and are therefore contrary to the recommendations of the Reform Panel and the Government acceptance of the Reform Panel’s recommendations.

The CPG seeks a Regulation that specifies that GWIC will track and monitor greyhounds on the companion animals register.

Compliance with the Act

The CPG amendment is in compliance with Clauses 42 and 48 of the Greyhound Racing Act 2017 which state:

42 Greyhounds generally
(1) A greyhound racing industry participant must not own, breed or keep a greyhound (whether or not the greyhound is owned, bred or kept in connection with greyhound racing) unless the greyhound is registered from the time the greyhound is 12 weeks old or such later time as may be prescribed by the regulations.

Maximum penalty: 100 penalty units.

Note. A greyhound registered under this Act is not required to be registered under the Companion Animals Act 1998. At present, the age at which any companion animal (which includes a greyhound) is required to be registered under that Act is 12 weeks.

(2) The owner of a registered greyhound must comply with any conditions to which the registration of the greyhound is subject.
Maximum penalty: 1,000 penalty units in the case of a corporation and 200 penalty units in the case of an individual.

48 Registration of greyhounds
(1) The Commission may, in accordance with the regulations, register a greyhound.
(2) The Commission may refuse to register a greyhound if it is of the opinion that it would be in the best interests of the greyhound racing industry to do so.
(3) The Commission may, on the registration of a greyhound or at any later time, impose conditions on the registration. Any such condition may be varied or revoked by the Commission.

**CPG Proposed Amendment**

The CPG seeks a Regulation to be included in the Greyhound Racing Regulation 2019 that:

(a) requires GWIC to track and monitor greyhounds on the companion animals register.

(b) gives GWIC the powers to track and monitor greyhounds on the companion animals register.

Eleonora Gullone, PhD
President
Coalition for the Protection of Greyhounds

Dennis Anderson
Vice President
Coalition for the Protection of Greyhounds
Dear Madam/Sir

Thank you for the opportunity to make a submission to the draft Greyhound Racing Regulation 2019. The Greens believe that the greyhound racing industry is incompatible with animal welfare and should be shut down. The industry continues to tolerate the deaths of thousands of dogs. Figures from the Greyhound Welfare and Integrity Commission (GWIC) show that 40% of greyhounds leave the industry dead.

The Special Commission of Inquiry into the Greyhound Racing Industry in NSW found that "of the 97,783 greyhounds that were bred in New South Wales in the last 12 years, the evidence suggests that somewhere between 48,891 and 68,448 dogs were killed because they were considered too slow to pay their way or were unsuitable for racing" and that "10-20% of trainers engaged in the barbaric practice of live baiting, where a vocal minority of trainers believed live baiting was necessary even after the Four Corners exposure and where large sections of the industry must have known that live baiting was occurring but did nothing to stop it."

Despite these stark findings of the Special Commission, the NSW Government continues to permit this industry to exist and subsidise it with public money. We believe that if Greyhound Racing is to continue in New South Wales, the regulations should be as strong as possible in order to attempt to reduce deaths, injuries and animal cruelty.

Please find our detailed comments on the proposed regulation below.

1. Support for expanding the definition of a greyhound racing industry participant.

The Regulations propose to expand the definition of a greyhound racing industry participant to a wider range of people, including: people who provide health services to greyhounds, people who handle greyhounds, people who artificially inseminate greyhounds, proprietors of trial tracks, officials at trial and race tracks, persons who offer applications for financial interests in greyhounds and people who manage ownership of greyhounds.

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2 Special Commission of Inquiry into the Greyhound Racing Industry in NSW, Volume 1, Page 1
3 Special Commission of Inquiry into the Greyhound Racing Industry in NSW, Volume 1, Page 6
We support the expansion of GWIC’s powers to monitor, investigate and regulate people in these classes of participant, as greyhounds in their care are at risk of mistreatment and cruelty, especially due to the widespread industry use of ‘muscle men’ in place of qualified veterinarians. The Special Commission of Inquiry into the Greyhound Racing Industry in NSW found that “muscle men often use, for treating greyhounds, drugs that are unregistered and unlabelled, and not intended for use for greyhounds” and “that the widespread treatment of greyhounds by muscle men, engaged by industry participants, places many greyhounds at significant risk of harm”

GWIC needs to be vigilant to ensure that any person who provides health services to greyhounds is qualified to do so, and are not engaging in painful procedures such as blistering, sclerosing, pin firing and needling.

To date, GWIC has not been effective in monitoring greyhound racing participants. For example, the recent case of Charles Sultana, who was found guilty of seven counts of being in charge of an animal and failing to provide vet treatment, was identified by the RSPCA, not by GWIC. GWIC needs additional budget, drawn from Greyhound Racing NSW and not from the taxpayer, to effectively utilise these new powers.

2. Proposed Register of Greyhounds is insufficient and fails to establish lifecycle tracking.

The Regulation proposes to require the Commission to keep registers of registered greyhounds. The regulation as written completely fails in the objective of whole of life cycle tracking and care, which is incongruent with the recommendations of the Special Commission of Inquiry into the Greyhound Racing Industry in NSW, the Greyhound Industry Reform Panel and even the industry’s proposed guarantees to reform greyhound racing.

There is still no plan to track greyhounds once they have been adopted. The proposed register would allow an owner to adopt out an animal to a relative or associate, who would then be free to dispose of the animal to the local pound or have the animal euthanised, with the owner having discharged their responsibilities. This is an ongoing concern which has been a risk for some time and which has not been addressed. Page 9 of the “Chief Executive Brief PN25/106—Greyhound Euthanasia Considerations and Emergency Euthanasia Provisions” of Greyhound Racing NSW states, "There remains a risk that a greyhound owner may submit to GRNSW a Notification of Retirement form advising their greyhound has been retired as a pet to friend or family member. As the greyhound is no longer registered with GRNSW, this friend or family member could immediately take the greyhound to the local council with the intention that the greyhound be euthanized".

Despite this risk being raised many times by the Greens and animal welfare groups, there is still no commitment to lifetime tracking. We believe that there should be a requirement to monitor the welfare of all greyhounds that exit the industry alive to ensure they are cared for throughout their entire life cycle.

In addition, any register needs to be publically available in order for the public to identify dogs that have been killed, for example after receiving a treatable injury.

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4 Special Commission of Inquiry into the Greyhound Racing Industry in NSW, Volume 2, Page 179
3. Annual reporting requirements of Greyhound Racing NSW and Greyhound Welfare Integrity Commission are not sufficient.

The proposed annual reporting requirements of the Greyhound Racing Welfare Integrity Commission are completely inadequate. The requirements appear to be designed to hide negative animal welfare outcomes of greyhound racing. For example, the only way for the public to know how many dogs are killed each year is to submit costly Government Information (Public Access) Act 2009 (GIPA) applications.

This complete lack of transparency, especially for an industry that is regulated by law and receives a significant amount of public money, is unacceptable.

At a minimum, GWIC should be required to publish full statistics on the following in its annual report:

- Greyhounds Euthanised:
  - Euthanised due to injury
  - Euthanised due to illness
  - Euthanised due to age
  - Euthanised by a registered vet on-track from an injury
  - Euthanised due to being deemed ‘Not Suitable for Re-homing’
  - Euthanised due to Unsuccessful Re-homing
  - Greyhounds Registered as leaving the industry
  - Greyhounds retired as a pet to self (participant)
  - Greyhounds retired by the participant to a private person (non-participant)
  - As a pet through Greyhounds as Pets
  - Greyhounds Exported, including destination countries.
  - Surrendered to another agency, such as RSPCA NSW or a Council facility (including details of participants charged by GWIC as a result of abandoning the animal and whether or not that animal is euthanized at that facility).
  - Deceased from track injuries (reported by GWIC as ‘sudden deaths’)

- The details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed. GWIC should also publish any transfers of greyhounds that happen after an individual is charged with a drug offence.

Greyhound Racing NSW should be required to publish how many greyhounds were tested by Greyhounds as Pets, the failure rate, how many dogs are euthanised in the care of Greyhounds as Pets and how many dogs that have failed Greyhounds as Pets are subsequently put down.

4. Strong support for information sharing.

We strongly support the increase in powers to share information contained on registers with animal welfare bodies, law enforcement and other Government agencies and bodies. This power is important to allow greyhound
racing participants who engage in animal cruelty, live baiting or other criminal acts to be identified and prosecuted and to save the lives of animals who are at risk.

5. The proposed Penalty Infringement Notice (PIN) penalties are not strong enough.

The regulation proposes to introduce Penalty Infringement Notices as an alternative or in addition to prosecution for offences under the Greyhound Racing Act 2017. Such offences include contravening the code of practice, registration offences and the keeping of any animal that is reasonably capable of being used as a lure in connection with the trialling, training or racing of greyhounds.

While we understand prosecutions are sometimes lengthy and difficult and that Penalty Notices can be issued more quickly, they should be used in addition to prosecutions, not in their place. In addition, the proposed penalties in the regulation are too small to be a significant deterrent and should be increased by a factor of at least five times.


A key part of the Greyhound Industry Reform Panel was the introduction of a ‘puppy bond’. This recommendation was issued more than two years ago and is yet to be adopted. Greyhound Racing NSW themselves as recently as 2018 stated that they are “firmly of the view that the imposition of a ‘pup bond’ is an essential measure to control breeding and to ensure that the welfare for greyhounds across NSW is paramount. The pup bond is one of a number of important measures to reduce wastage proposed to be introduced by the new GRNSW leadership. These measures were recommended by the Greyhound Industry Reform Panel and approved by NSW Government in February 2017”.

The Regulation should include the clear provision for introduction of a Puppy Bond.

Please do not hesitate to contact our offices for further information.

Kind Regards

Mehreen Faruqi
SENATOR FOR NSW

Abigail Boyd
MEMBER OF THE NSW LEGISLATIVE COUNCIL

AUSTRALIAN GREENS SPOKESPERSON FOR ANIMAL WELFARE

NSW GREENS SPOKESPERSON FOR ANIMAL WELFARE

Online submission: on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Wed, Jul 10, 2019 at 9:32 PM
To: @racing.nsw.gov.au

Your details
First name: 
Last name: 
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

Other issues:
The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other crime.

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name

Acknowledgement: I agree to the above statement.
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

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The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other...
Online submission: Rachelle El Hage on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Thu, Jul 11, 2019 at 3:10 PM
To: @racing.nsw.gov.au

Your details
First name: Rachelle
Last name: El Hage
Organisation:
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number:

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

Registration of greyhounds, industry participants, trial tracks:
The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
No comment.

Penalties:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

Other issues:
This is important to allow for participants who engage in cruelty to be identified and prosecuted, and to save the lives of animals at risk. This does not establish a puppy bond, as promised by NSW Government. This should be included.

Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.
Your details

First name: [REDACTED]
Last name: [REDACTED]
Organisation: [REDACTED]
Postal address: [REDACTED]
Suburb: [REDACTED]
State: [REDACTED]
Postcode: [REDACTED]
Email: [REDACTED]
Contact phone number: [REDACTED]

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):

I believe greyhound owners must have to report all births, deaths & re-homing to provide transparent business due to the well-being of a living thing. I do not believe in greyhound racing, yet if it has to be legal, it must be more governed.

Registration of greyhounds, industry participants, trial tracks:

The Commission must be held responsible for any greyhound that dies due to the racing industry. The industry has cost too many lives to still be so free in business. Greater regulations will hopefully HP greyhounds be seen as more than a commodity & instead as a living, breathing creature that should be treated with dignity and respect, in life and death.

Registration of greyhound racing clubs:

Rescue groups should be permitted to know the going ons in racing clubs, so as to create transparency, seeing as these groups are what keeps the greyhound industry running.

Penalties:

I believe all breaches in accordance with the Commission should be awarded higher penalties due to the disregard of any regulations results in greyhound deaths. Death should be considered as a disregard for the regulations, and should therefore be punished accordingly.

Other issues:

Greyhound racing is a barbaric way of human entertainment and should no longer be seen as entertainment. However, if it is still deemed legal, we must have stricter restrictions that really punish person's who have a disregard for a life.

Privacy & confidentiality

Publication of your details: Publish my submission but do not publish my name

Acknowledgement: I agree to the above statement.
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent.

We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other criminal activities to be identified and prosecuted.
Online submission: Phill Craswell on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Sat, Jul 13, 2019 at 6:30 AM
To: racing.nsw.gov.au

Your details
First name: Phill
Last name: Craswell
Organisation: [redacted]
Postal address: [redacted]
Suburb: [redacted]
State: [redacted]
Postcode: [redacted]
Email: [redacted]
Contact phone number: [redacted]

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
Registration of greyhounds, industry participants, trial tracks:
Registration of greyhound racing clubs:
Penalties:

Other issues:
The greyhound industry is abhorrent and corrupt. Dogs are overbred and the wastage is unacceptable. Racing is cruel and injuries to hounds happen far too often with many dogs being put down. Australia does not need to continue with this barbaric cruel ‘sport’.

Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.
Online submission: Brendan Radford on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Sat, Jul 13, 2019 at 7:08 PM
To: Racing@nsw.gov.au

Your details
First name: Brendan
Last name: Radford
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
Registration of greyhounds, industry participants, trial tracks:
Registration of greyhound racing clubs:
Penalties:
Other issues:
Privacy & confidentiality 
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.
Online submission: on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Sun, Jul 14, 2019 at 12:13 PM
To: @racing.nsw.gov.au

Your details
First name: 
Last name: 
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
Registration of greyhounds, industry participants, trial tracks:
Registration of greyhound racing clubs:
Penalties:

Other issues:

The greyhound industry is cruel and barbaric. We wouldn't expect our pet dogs or cats to race for money, and we should not be expecting it of greyhounds. Would you treat your pet dog in this way? Ban greyhound racing for good and treat all animals the way they deserve.

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name
Acknowledgement: I agree to the above statement.
Online submission: on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Sun, Jul 14, 2019 at 9:56 PM
To: @racing.nsw.gov.au

Your details
First name: 
Last name: 
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
There are two greyhound tracks in the City of Wollongong, and there is a lot of concern regarding the welfare and survival of greyhounds involved in racing. It is essential that the most stringent reporting standards are required of GRNSW and GWIC. There is a systemic issue that greyhounds considered too slow to pay their way or otherwise unsuitable for racing are disposed of. I am concerned that the Annual Reporting requirements for both the GRNSW and GWIC on animal welfare and integrity matters fail to provide transparency. I am alarmed that this reporting standard is will prevent the public knowing how many dogs are killed by this industry. There is a well known saying, you can manage what you can't measure.

Registration of greyhounds, industry participants, trial tracks:
I am concerned that the proposed register of greyhounds fails to ensure lifetime tracking and care. What protections are there against the loophole where "adopted" greyhounds cease to be monitored by GWIC, even when they are adopter is the owner or trainer? GWIC should continue to monitor what happens to greyhounds once they are adopted. To fail to do so risks the under-reporting of "wastage" within the greyhound industry.

Registration of greyhound racing clubs:
No comment.

Penalties:
The proposed penalties are completely inadequate as a deterrent, especially considering the amounts of money that can be made on racing and betting. The penalties should operate in parallel to prosecution, not be a replacement for it. Considering that the Four Corners expose on greyhound racing showed numerous greyhound racing participants expressing support for live baiting, it is clear that the penalty infringement notices must be strengthened and increased.
Considering the continuation of the greyhound industry, inspite of the findings of the Special Commission of Inquiry, it is essential that these regulations be monitored and reviewed to ensure that they are stringently being followed and a providing animal welfare.

Other issues:

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name
Acknowledgement: I agree to the above statement.
Online submission: MELISSE Reynolds on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Mon, Jul 15, 2019 at 10:09 AM
To: @racing.nsw.gov.au

Your details
First name: MELISSE
Last name: Reynolds
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Regulations propose to expand the definition of a greyhound racing industry participant to a wider range of people, including: people who provide health services to greyhounds, people who handle greyhounds, people who artificially inseminate greyhounds, proprietors of trial tracks, officials at trial and race tracks, persons who offer applications for financial interests in greyhounds and people who manage ownership of greyhounds. We support the expansion of GWIC’s powers to monitor, investigate and regulate people in these classes of participant, as greyhounds in their care are at risk of mistreatment and cruelty, especially due to the widespread industry use of ‘muscle men’ in place of qualified veterinarians. The Special Commission of Inquiry into the Greyhound Racing Industry in NSW found that “muscle men often use, for treating greyhounds, drugs that are unregistered and unlabelled, and not intended for use for greyhounds” and “that the widespread treatment of greyhounds by muscle men, engaged by industry participants, places many greyhounds at significant risk of harm” 4 GWIC needs to be vigilant to ensure that any person who provides health services to greyhounds is qualified to do so, and are not engaging in painful procedures such as blistering, sclerosing, pin firing and needling. To date, GWIC has not been effective in monitoring greyhound racing participants. For example, the recent case of Charles Sultana, who was found guilty of seven counts of being in charge of an animal and failing to provide vet treatment, was identified by the RSPCA, not by GWIC. GWIC needs additional budget, drawn from Greyhound Racing NSW and not from the taxpayer, to effectively utilise these new powers.

Registration of greyhounds, industry participants, trial tracks:
The Regulation proposes to require the Commission to keep registers of registered greyhounds. The regulation as written completely fails in the objective of whole of life cycle tracking and care, which is incongruent with the recommendations of the Special Commission of Inquiry into the Greyhound Racing Industry in NSW, the Greyhound Industry Reform Panel and even the industry’s proposed guarantees to reform greyhound racing. There is still no plan to track greyhounds once they have been adopted. The proposed register would allow an owner to adopt an animal to a relative or associate, who would then be free to dispose of the animal to the local pound or have the animal euthanised, with the owner having discharged their responsibilities. This is an ongoing concern which has been a risk for some time and which has not been addressed. Page 9 of the “Chief Executive Brief PN25/106—Greyhound Euthanasia Considerations and Emergency Euthanasia Provisions” of Greyhound Racing NSW states, “There remains a risk that a greyhound owner may submit to GRNSW a Notification of Retirement form advising their greyhound has been retired as a pet to friend or family member. As the greyhound is no longer registered with GRNSW, this friend or family member could immediately take the greyhound to the local council with the intention that the greyhound be euthanised”. Despite this risk being raised many times by the Greens and animal welfare groups, there is still no commitment to lifetime tracking. We believe that there should be a requirement to monitor the welfare of all greyhounds that exit the industry alive to ensure they are cared for throughout their entire life cycle. In addition, any register needs to be publicly available in order for the public to identify dogs that have been killed, for example after receiving a treatable injury.
Registration of greyhound racing clubs:

3. Annual reporting requirements of Greyhound Racing NSW and Greyhound Welfare Integrity Commission are not sufficient. The proposed annual reporting requirements of the Greyhound Racing Welfare Integrity Commission are completely inadequate. The requirements appear to be designed to hide negative animal welfare outcomes of greyhound racing. For example, the only way for the public to know how many dogs are killed each year is to submit costly Government Information (Public Access) Act 2009 (GIPA) applications. This complete lack of transparency, especially for an industry that is regulated by law and receives a significant amount of public money, is unacceptable. At a minimum, GWIC should be required to publish full statistics on the following in its annual report:

- Greyhounds Euthanised:
  - Euthanised due to injury
  - Euthanised due to illness
  - Euthanised due to age
  - Euthanised by a registered vet on-track from an injury
  - Euthanised due to being deemed 'Not Suitable for Re-homing'
  - Euthanised due to Unsuccessful Re-homing
  - Greyhounds Registered as leaving the industry
  - Greyhounds retired by the participant to a private person (non-participant)
  - Greyhounds Exported, including destination countries
  - Surrendered to another agency, such as RSPCA NSW or a Council facility (including details of participants charged by GWIC as a result of abandoning the animal and whether or not that animal is euthanized at that facility)
  - Deceased from track injuries (reported by GWIC as 'sudden deaths')

- The details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed.

GWIC should also publish any transfers of greyhounds that happen after an individual is charged with a drug offence. Greyhound Racing NSW should be required to publish how many greyhounds were tested by Greyhounds as Pets, the failure rate, how many dogs are euthanised in the care of Greyhounds as Pets and how many dogs that have failed Greyhounds as Pets are subsequently put down.

Penalties:

We strongly support the increase in powers to share information contained on registers with animal welfare bodies, law enforcement and other Government agencies and bodies. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other criminal acts to be identified and prosecuted to save the lives of animals who are at risk. The regulation proposes to introduce Penalty Infringement Notices as an alternative or in addition to prosecution for offences under the Greyhound Racing Act 2017. Such offences include contravening the code of practice, registration offences and the keeping of any animal that is reasonably capable.

Other issues:

Privacy & confidentiality

Publication of your details: Publish my full submission including my name

Acknowledgement: I agree to the above statement.
GWIC and GRNSW reporting requirements have not been acceptable in matters of integrity and transparency in matters of greyhound racing. Annual reporting requires keeping a 'clean' and 'public respectability' image of greyhound racing. This has lead to failure of public access to true information and failure of transparency. GWIC and GRNSW were created and are funded to provide disclosure/true information to the public. They need to provide this service. Information to be shared to the public (without right for information requirements) - Number of deaths*
Number of pups born Number of dogs killed by GAP *for track deaths, it needs to be reported what was the reason for death. Investigation to follow to determine cause of death so can report on reason of death. Very vague 'reasons' attributing to death have previously been reported.

There has been a lack of life time tracking, as was promised. Clearly this needs rectifying in progress to reform. Supportive of a provision of health services to greyhounds. A loop hole of welfare is trainers or owners 'adopting' the greyhound only to dispose of the dog through killing, or transfer to dire conditions including export of the dog overseas. Public needs to be able to gain access to information (current) to each greyhound - ie alive/deceased - monitoring of the greyhound throughout its life is required.

Penalties have thus far been inappropriate to the offence. Gross negligence of implementing penalties appropriate to the offence.

A step is to improve information sharing between welfare, law, racing & government so that each is fully informed and additionally can take ownership. The puppy bond as has lacked a presence, needs to be introduced. Solution: ban racing (track deaths, drugging & overbreeding are inherent).
functions and reports of the greyhound welfare and integrity commission and greyhound racing nsw (grnsw):

the annual reporting requirements for both the greyhound welfare integrity commission (gwic) and greyhound racing nsw (grnsw) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. both of these bodies are established in law and given the amount of public money the nsw government gives to the industry, they should be required to be much more transparent. we know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. as a minimum, gwic must be required to report the number of greyhounds killed each year and for what reason and grnsw should report the number of dogs that fail the industry ‘greyhounds as pets’ program, and track what happens to those greyhounds. further, gwic should be required to publish full statistics on greyhounds being euthanised including if it was done due to injury, illness, age, by registered on-track vet, not suitable for rehoming, unsuccessful rehoming, leaving the industry, retired as pet to self, retired by the participant to non-racing participant, through gap, exported including the country of export, surrendered to another agency, deceased due to track injury. details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed, and any transfer of that greyhound during a suspension period. public money is being spent on an industry which takes punters’ money and full disclosure of these types of matter should be made.

registration of greyhounds, industry participants, trial tracks:

the nsw greyhound racing industry must pay the cost for gwic utilising these expanded powers, not the taxpayer. the proposed register of greyhounds does not deliver the nsw government’s promise for lifetime tracking of greyhounds. the ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where gwic no longer monitors the animal, which can then be killed. the regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them. in addition, any register needs to be publicly available in order for the public to identify dogs that have been killed, for example after receiving a treatable injury.

registration of greyhound racing clubs:

no comment

penalties:

the penalties provided are completely inadequate and not in proportion with the offences as detailed in the greyhound racing act 2017. penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

other issues:

the proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other government agencies and bodies is supported. regulation
fails to establish a puppy bond as promised by Govt. The solution to deal with issues in the industry - shut it down

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name

Acknowledgement: I agree to the above statement.
Greyhound Racing Regulation 2019
Office of Racing
GPO Box 7080
SYDNEY NSW 2001

By email: racing.admin@racing.nsw.gov.au

18 July 2019

Dear Sir/Madam,

RE: THE DRAFT GREYHOUND RACING REGULATION 2019

Humane Society International (HSI) is the world’s largest conservation and animal welfare organisation with over 10 million supporters globally. We have more than 25 years’ experience in Australia working actively to assist governments to further the protection of animals and the environment through appropriate regulation and enforcement.

HSI feels strongly that the use of greyhounds for racing and gambling is inhumane and should be prohibited. The industry repeatedly puts financial considerations before the welfare of the dogs with routine cruelty inflicted on the dogs and high levels of criminality. We regret that Australia is one of just 8 countries in the world that continues to allow this industry. Stronger regulations are urgently needed, particularly when this industry is subsidised by the NSW public, many of whom oppose it.

We recommend the following:

- The annual reporting proposed by GIWC fall short of those expected and demonstrate a clear lack of transparency. Full statistics on greyhounds euthanized need to be provided as well as full details on drug offences including the name of the dog, the trainer and owner involved. Full details on the Greyhounds as Pets program have also been omitted and they should be disclosed.

- The Register of greyhounds does not fulfil its purpose of tracking each dog for its whole life cycle, failing to meet the recommendations of the Special Commission of Inquiry into the Greyhound Racing Industry in NSW and the Greyhound Industry Reform Panel. The draft allows an owner to adopt a greyhound to an associate or relative who could then dispose of the animal at a pound or let it be euthanized. Instead, the responsibility should remain with the owner and this point needs to be urgently addressed. This greyhound register must also be made public for transparency. Lifetime tracking of every greyhound that exits the racing industry is critical if they are seriously committed to genuine reform.

- HSI supports the amended definition of ‘greyhound racing industry participant’ because this will help to ensure that those who provide health services to
greyhounds are sufficiently qualified. This amendment will allow the Greyhound Welfare and Integrity Commission (GIWC) to operate more efficiently and counteract any wrongdoing.

- The proposed penalty notices outlined in Schedule 1 need to be significantly stronger in order to act as a suitable deterrent, preventing individuals from offending.

- HSI is strongly opposed to the over-breeding of greyhounds each year in Australia, and believes that no animal should die in the name of sport, gambling or entertainment. It seems that the ‘puppy bond’ recommended by the Greyhound Industry Reform Panel in 2017 has not been incorporated into this draft, and HSI supports its introduction because it would serve to reduce the serious problem of wastage.

Thank you again for the opportunity to provide comments on the draft Greyhound Racing Regulation 2019. Please forward any correspondence in relation to this submission by email to georgie@hsi.org.au. Thank you again for the opportunity to comment.

Yours sincerely,

Georgie Dolphin
Program Manager – Animal Welfare
Humane Society International
Online submission: [REDACTED] on the proposed Greyhound Racing Regulation 2019

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Wed, Jul 17, 2019 at 12:44 PM

To: [REDACTED]@racing.nsw.gov.au

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Your details
First name: [REDACTED]
Last name: [REDACTED]
Organisation: [REDACTED]
Postal address: [REDACTED]
Suburb: [REDACTED]
State: [REDACTED]
Postcode: [REDACTED]
Email: [REDACTED]
Contact phone number:

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

Registration of greyhounds, industry participants, trial tracks:
The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution. The Regulation should include the clear provision for introduction of a Puppy Bond. In conclusion, the Greyhound Racing industry has proven time and again that it is unable to reform. This regulation is a tiny step forward, it will not prevent the deaths and suffering of thousands of dogs.

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name
Acknowledgement: I agree to the above statement.
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution. Other issues: The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other criminal acts to be identified and prosecuted and to save the lives of animals who are at risk. The Regulation fails to clearly establish a puppy bond, as was promised by the NSW Government. The Regulation should include the clear provision for introduction of a Puppy Bond. In conclusion, the Greyhound Racing industry has proven time and time again that it is unable to reform and whilst this regulation is a tiny step forward, it will not prevent the deaths and suffering of thousands of dogs. The only solution is to ban greyhound racing in NSW.

I included ‘other issues’ in the box above as you have not provided enough space here!
Publication of your details:
Publish my submission but do not publish my name

Acknowledgement: I agree to the above statement.
Online submission: [Redacted] on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au>  Wed, Jul 17, 2019 at 5:00 PM
To: [Redacted]@racing.nsw.gov.au

Your details
First name: [Redacted]
Last name: [Redacted]
Organisation: [Redacted]
Postal address: [Redacted]
Suburb: [Redacted]
State: [Redacted]
Postcode: [Redacted]
Email: [Redacted]
Contact phone number: [Redacted]

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):

Reporting requirements need to be extended to not just include a summary of injuries to dogs participating in races (clause 5 d) to what happened to them: "how many were euthenised because of treatable injuries? *how many were dumped on greyhound adoption charities (take this dog or we euthenise it)? Further to details of greyhound adoption programs managed or supported by the GRNSW (including the number of dogs adopted): "how many were assessed by GAP as unsuitable and then euthenised? *how many were rejected by GAP and then rehomed by the charities?"

I strongly support the registration of other industry participants such as muscle men. However, annual registration would be more effective at keeping track of people than 3 yearly. The proposed greyhound racing register does not satisfy Recommendation 73 of the Greyhound Industry Review Panel "to capture the identity and whereabouts of all greyhounds throughout their lifecycle." A dog can be easily reclassified as a companion animal and then euthenised or dumped in a pound without any reference to GWIC. Introducing a Puppy Bond as recommended by the review panel would go some way to giving some monetary value to unsuccessful or retiring dogs and assist the GWIC to keep track of them as the owner would have to apply to the GWIC for the bond to be refunded.

Registration of greyhound racing clubs:

The penalties are inadequate and do not act as a sufficient disincentive to those breaching the rules. Perhaps increase them tenfold. The Other Issues field is not working properly so I am commenting here. It is more than 2 years since the NSW government undertook to implement 121 of the Greyhound Industry Review Panel's recommendations. Progress has been painfully slow. In the 9 months since GWIC began 1773 greyhounds left the industry and of them 660 are known to be dead, or almost 40%. Retired is often a euphemism for dead. Recommendation 79 said that owners should be principally responsible for the welfare of their greyhounds for their full natural life including ensuring their suitability to be rehomed at any stage of their lives. If GAP assesses a dog as unsuitable for rehoming the owner must be made to take some responsibility for this, and not just allowed to dispose of his problem by killing the dog. If GAP is motivated to reject a certain number of dogs because the demand for rehoming is too great, that problem needs to be addressed. There needs to be a limit on the number of dogs bred in order to reduce the appalling rate of 'wastage' which still persists. Again, a Puppy Bond would help address this. If the lives and welfare of greyhounds cannot be protected the industry must be closed. The situation described in Justice McHugh's report does not seem to have changed much in the years since the ban was reversed.

Other issues:
Support information sharing.

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name details.

Acknowledgement: I agree to the above statement.
Your details
First name: 
Last name: 
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds. the greyhound industry as a whole as demonstrated by the commission has no regard for mandated reporting requirements and will do what it can to subvert information, conceal illegal practices, and generally ignore whatever regulations are placed on them - as they have done for decades.

Registration of greyhounds, industry participants, trial tracks:
The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
The commission should be concentrating on shutting down clubs and not registering new ones.

Penalties:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution. as is consistently demonstrated by industry participants, the blatant disregard for the law alongside their disregard for the welfare of animals, will not be changed by ineffectual penalties.

Other issues:
Utilising a character restricted text box for ‘other issues’ is demonstrative of the inability of government to regulate anything let alone an industry hell bent on animal abuse. Shut it Down.

Privacy & confidentiality
Publication of your details: 

Acknowledgement: I agree to the above statement.
Dear Sir or Madam,

Please find my submission below for the Greyhound Racing Regulation

14 - Conditions on registration of greyhound racing industry participant

- I propose that all greyhound trainers achieve a Certificate II in Racing Greyhounds before achieving registration. Greyhounds are a breed with requirements that are different to other dog breeds, therefore the trainers must be qualified.
- Once a trainer has been suspended, it should not be legal for trainers to transfer their registration to a close friend or family member. This is because in the past the suspended trainer continues to train the greyhounds in a cruel manner behind the scenes.

Schedule 1 Penalty notice offences

- Current penalties are too low to be considered a deterrent and should be a minimum of $5,000 and jail sentences should be included.

Schedule 2 Savings and transitional provisions

- 100% agree

Lack of euthanasia clauses

It needs to be placed in this regulation when a greyhound is suitable for euthanasia. Currently too many greyhounds are being euthanized for treatable injuries and because they are “unsuitable for rehoming”. I also request that that is removed from the form and that the Racing Industry takes a rescue viewpoint rather than one of euthanasia.

Lack of a Puppy Bond

A $500 puppy bond so that greyhounds can be tracked throughout their life has been proposed previously by the GWIC but not actioned. This is necessary for minimising unauthorised killings that happen on farms.

Best regards,
Greyhound Racing Regulation 2019

1 message

Thu, Jul 18, 2019 at 10:42 AM

July 18th 2019

The Office of Racing, Sydney

Dear Sir,

We wish to make it clear in the strongest possible way, that we adamantly do not want any of our private details to be shared with RSPCA and the NSW Animal Welfare League as proposed in Division 4 20 (a) & (b).

These organisations do not support greyhound racing, and NSWAWF is constantly attacking the industry.

Given their antipathy towards the industry, we believe that neither organisation is worthy of being included as outlined in Division 4 20 (a) & (b).

We trust that our strong disagreement will be considered,

Yours faithfully,
Submission to the RIS on Greyhound Racing Regulation 2019.

18 July 2019

From: [redacted]

First, it is necessary to record that government policy – the basis of this document – is flawed to the extent that it was constructed on a personal whim of the Premier and then-Racing Minister and attracted significant opposition from the people of NSW as well as industry members. Its methodology has been criticised by the Auditor General, while the background data from the McHugh Commission contained serious errors.

Second, such “policy” was then restated under the aegis of a poorly titled Reform Panel which had little expertise in greyhounds and/or racing. The report of that Panel was never reviewed or debated but is heavily used in this RIS.

Third, the major change involved the separation of the former GRNSW into two separate organisations – a new GRNSW and GWIC with the latter to be funded by the former and GWIC to be responsible solely to government. Such a move is not justified by any rational reasoning or by efficiency measures and has previously failed (ie the former GHRRA) in NSW and is disruptive in Queensland. Effectively, it also leaves GRNSW with an unrestrained obligation to fund GWIC.

Fourth, (see p11) the greyhound allocation of “benefits” from the POC tax and wagering tax parity were arbitrarily discounted below activity levels by a Minister who clearly selected methods which would discriminate against greyhound racing.

In total, government policy has significantly disadvantaged greyhound racing relative to other racing codes and to broader principles of fairness and objectivity. This is unacceptable and will continue to form a basis for criticism of government as long as it persists.

As to the detailed proposals, I make only one comment:

101(2)(e) Clause 20

The suggestion that GWIC should share information willy nilly with outside organisations is to deny the normal rights of participants to privacy. In particular, offering data to the ATO or any animal welfare groups is unacceptable. The ATO is well able to access such information on its own and does so on a routine basis. Animal welfare groups have been found to use illegal means to obtain private information – and are still doing so. Indeed, state governments are working out how to stop this abuse as we speak. Their anti-racing bias alone disqualifies them from offering useful contributions – ie it runs contrary to the stated objectives of both GRNSW and GWIC.

I except RSPCA from these comments to the extent that it is so authorised under current legislation - albeit on welfare matters, not racing as such.
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):

The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed 'unsuitable to be rehomed'. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhounds, industry participants, trial tracks:

The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution. Regarding Other issues below:

The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other criminal acts to be identified and prosecuted and to save the lives of animals who are at risk. The Regulation fails to clearly establish a puppy bond, as was promised by the NSW Government. The Regulation should include the clear provision for introduction of a Puppy Bond. In conclusion, the Greyhound Racing industry has proven time and time again that it is unable to reform and whilst this regulation is a tiny step forward, it will not prevent the deaths and suffering of thousands of dogs. The only solution is to ban greyhound racing in NSW.

Other issues:

Privacy & confidentiality

see box above "penalties", this box is too small!
Publication of your details:
Publish my submission but do not publish my name
Acknowledgement: I agree to the above statement.
Online submission: Regine Matolcsy on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Thu, Jul 18, 2019 at 12:36 PM
To: @racing.nsw.gov.au

Your details
First name: Regine
Last name: Matolcsy
Organisation:
Postal address:
Suburb:
State:
Postcode:
Email:
Contact phone number:

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
Registration of greyhounds, industry participants, trial tracks:
Registration of greyhound racing clubs:
Penalties:

Other issues:

Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.

I support the expansion of GWIC’s powers to monitor and regulate the industry as up to today GWIC has not been effective in monitoring greyhound racing participants.

Annual reporting requirements of greyhound racing NSW and greyhound welfare commission are not sufficient. There exists a complete lack of transparency in an industry that is regulated by law and receives public funding.

Penalties to unlawful behaviour in the greyhound racing industry are much too small to be a true deterrent. New regulations should also include a clear provision for the introduction of a "puppy bond".

The greyhound racing industry is incompatible with animal welfare and the ethical behaviour of people living in a developed country. As long as the industry is allowed to continue the strongest possible regulations should be in place to protect the vulnerable dogs. The aim is to abolish this industry.
Online submission: Matthew Goldman on the proposed Greyhound Racing Regulation 2019

Your details

First name: Matthew
Last name: Goldman
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The proposed requirements are grossly inadequate. The industry, as the beneficiary of public funding, must be completely transparent, without exceptions. Every single dog that is killed must be openly, transparently and publicly reported on.

Registration of greyhounds, industry participants, trial tracks:
There needs to be stronger, legislated and government funded and supported lifetime tracking of this industry's animals. This means that adopting a greyhound to yourself - a well known and well established practice in the industry - to exploit a loophole needs to be forbidden, as well as monitored and enforced. The expansion of the definition of 'industry participants' is a good idea.

Registration of greyhound racing clubs:
The penalties are woefully inadequate. The purpose of a penalty is to act as a deterrent; under the proposed regulation they would be little more than an inconvenience. The consequences need to be severe and immediate in order to be effective.

Other issues:
The failure of the NSW Government to introduce the puppy bond, as promised, is shameful and should be a priority. Additionally, it is incumbent upon the NSW Government - and not the greyhound racing industry, who rightly cannot be trusted to do so - to monitor and enforce this.

Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.
Online submission: [REDACTED] on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Thu, Jul 18, 2019 at 1:04 PM

To: [REDACTED]@racing.nsw.gov.au

Your details
First name: [REDACTED]
Last name: [REDACTED]
Organisation: [REDACTED]
Postal address: [REDACTED]
Suburb: [REDACTED]
State: [REDACTED]
Postcode: [REDACTED]
Email: [REDACTED]
Contact phone number: [REDACTED]

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
With respect to Part 2, division 5 – Annual report of GRNSW- The annual report should also
include the above information, namely 1) the number of greyhounds whelped. 2) The number of
greyhounds rehomed in retirement through industry programs or other programs. 3) The number
of greyhound’s euthanised with a differentiation to distinguish between retired and euthanised.

Registration of greyhounds, industry participants, trial tracks:

With respect to section Division 4 of part 3 which Provides for the making of regulations requiring
the Commission to keep registers containing information about greyhounds, industry participants
and trial tracks; Clause 19 Proposes to require the Commission to keep registers of registered
greyhounds, industry participants and trial tracks. I respectfully request that registers should also
include 1) the number of greyhounds whelped. 2) The number of greyhounds rehomed in
retirement through industry programs. 3) The number of greyhound’s euthanised with a
differentiation to distinguish between retired and euthanised.

Registration of greyhound racing clubs:

Penalties:

Other issues:

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name

Acknowledgement: I agree to the above statement.
Online submission: Jo Hobson on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Thu, Jul 18, 2019 at 4:41 PM

To: racing.nsw.gov.au

Your details
First name: Jo
Last name: Hobson
Organisation: -
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The annual reporting from both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) regarding animal welfare needs to be improved. More information needs to be released about the number of greyhounds injured, killed and euthanised by the industry. There needs to be much more transparency.

Registration of greyhounds, industry participants, trial tracks:
There needs to be lifetime tracking of all greyhounds so that the public can feel confident about the welfare and fate of the many dogs in the industry. The proposal to widen the definition within the industry to include health services and others who come in contact with the racing greyhounds is supported.

Registration of greyhound racing clubs:

Penalties:
Penalties are totally inadequate and need to be increased. Penalties should not mean that prosecution is not pursued - both disciplinary options need to be used. There needs to be mandatory life bans as well as increased jail terms for live baiting.

Other issues:
Information exchange between the greyhound racing industry, animal welfare bodies, plus Government and law enforcement bodies is strongly supported.

Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.
Online submission: Lisa Ryan on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Thu, Jul 18, 2019 at 5:01 PM

To: digital.publishing@industry.nsw.gov.au

Your details
First name: Lisa
Last name: Ryan
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
No comment

Penalties:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

Other issues: This field will not allow sufficient space to comment!

Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.

https://mail.google.com/mail/u/0?ik=c85505dd9f&view=pt&search=all&permthid=thread-f%3A1639378635657492230&simpl=msg-f%3A16393786...
SUBMISSION REGARDING THE PROPOSED GREYHOUND RACING REGULATION 2019 (NSW)

19 July 2019

All correspondence regarding this submission should be directed to the following:

Paula Hough
Vice President and Deputy General Counsel, Asia-Pacific
PETA Australia
PaulaH@peta.org.au
A. About PETA Australia

People for the Ethical Treatment of Animals (PETA) Australia is the local affiliate of PETA US – the world's largest animal rights organisation – and is opposed to speciesism.

PETA works through public information, research, lobbying, celebrity involvement, and protest campaigns to focus international attention on the exploitation and abuse of animals as living test tubes in laboratories, for their flesh, for their skin, and for entertainment.

B. PETA's Comments on the Draft Greyhound Racing Regulation 2019 (NSW)

PETA has had the opportunity to review the submission prepared by the Coalition for the Protection of Greyhounds (CPG) and endorses the comments and recommendations made therein regarding steps that must be taken to alleviate at least a small part of the misery endured by greyhounds used for racing. Our additional comments follow.

PETA shares the concerns put forth by the CPG regarding the lack of provision for the Greyhound Welfare and Integrity Commission to track and monitor the welfare of greyhounds throughout their lives. In order to submit an accurate annual report, which is a function of the Commission, all dogs must be tracked from birth to death.

Greyhound Racing NSW (GRNSW) has advised that 7,500 greyhounds would need to be whelped each year in order to meet a racing schedule similar to that of the 2015–16 financial year.\(^1\) Since greyhounds have a life expectancy of between 12 and 15 years, the vast majority of these dogs will need to become registered "companion" animals either when they are 12 months old – and deemed too slow to race – or at retirement age, when they are around 4 years old. Even though breeding has decreased in recent years,\(^2\) freedom of information requests show that almost 40% of racing greyhounds have died from disease or injuries sustained at the track or have been euthanised.\(^3\)

It is unrealistic to pretend that the number of people available to adopt these animals will keep up with such a breeding schedule. And greyhounds who have been discarded from the industry and registered as companion animals


will continue to add to the population of animals languishing in shelters around Australia. More than 200,000 animals are already euthanised every year for lack of good homes, and the large number of homeless greyhounds must compete for adoption.

PETA submits that New South Wales should follow the example set by the Victorian government in 2017 when it introduced a cap on the number of female dogs a breeder can keep. Ultimately, no more dogs should be bred each year than the number of homes that can be found by GRNSW adoption programmes for greyhounds discarded by the industry.

Community expectations are that issues regarding the welfare of greyhounds bred for racing can be addressed only by putting an end to the racing industry. Continuing to regulate and reform an industry that is not supported by the vast majority of New South Wales constituents is out of step with public sentiment. Implementing the suggestions put forward by the CPG, PETA, and other animal protection groups is the very least the government can do.

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5See Domestic Animals Act 1994 (Vic) ss 54B, 58AA.
Inquiry into greyhound racing regulation NSW

Who we are

Australian Ethical Investment Limited was established in 1986 to manage the retirement and other savings of Australians in an environmentally and socially responsible way. Today we manage over $3 billion in superannuation and managed funds for over 45,000 Australians.

As a super fund we invest with long term interests and responsibilities across society and the economy. This perspective is important to consider alongside the voices of individual companies, industries and civil society groups which often focus on narrower business, social or environmental interests. Our broader perspective is embodied in our Ethical Charter (https://www.australianethical.com.au/australian-ethical-charter/).

We recognise that animals are sentient and have the capacity to suffer.1 Our Ethical Charter requires us to seek out investments which provide for and support the dignity and wellbeing of animals and avoid any investments which unnecessarily cause them harm. Applying these principles, we do not support greyhound racing (or generally, uses of animals for human entertainment purposes which puts animals at risk of harm).

As investors, we assess companies in a range of industries and sectors and across various issues including with respect to aspects of governance and culture. For example, we reviewed closely the findings of the Banking Royal Commission and we are currently monitoring the Aged Care Royal Commission. Both Commissions demonstrate the importance of good governance, transparency, accountability and an ethical culture to ensure the sustainability of a business or industry. Conversely, they also demonstrate the longer-term damage and instability that can result from organisations prioritising short term gains at the expense of integrity. We comment on the proposed regulations, and some aspects of the regulatory framework, from this perspective.

Our submission

Introduction

Thank you for the opportunity to make a submission to the draft Greyhound Racing Regulation 2019. Australian Ethical Investment believes that the greyhound racing industry is incompatible with animal welfare and we do not support its continuation. The Special Commission of Inquiry into the Greyhound Racing Industry in NSW uncovered evidence of systemic governance and cultural issues within the industry, such as:

- although illegal, the practice of live baiting was condoned by many industry participants. Between 10 and 20% of trainers engaged in live baiting and considered this criminal conduct 'necessary' and many others knew that live baiting was occurring but did nothing to stop it;

- the industry treated greyhounds as dispensable commercial commodities and preferred the commercial interests of the industry to the animal welfare interests of greyhounds. Of the 97,783 greyhounds that

were bred in NSW in the 12 years leading to the inquiry, between 48,891 and 68,448 dogs were killed because they were too slow or otherwise unsuitable for racing; and

- Greyhound Racing NSW sought to deceive the public about the number of deaths and injuries on tracks to avoid criticism of the industry.

Given this government has determined that the greyhound racing industry should continue in NSW (and that it should in part be supported by tax payer funding) it is the responsibility of this government to insure the industry has the highest standards of governance, transparency and accountability. However, we assess there to be loopholes and weaknesses in the current and proposed regulatory framework that we think could allow some of the damning practices identified by the Special Commission of Inquiry to continue.

**We support expanding the definition of a greyhound racing industry participant**

We understand that currently the Greyhound Welfare and Integrity Commission (GWIC) has limited powers to monitor individuals who participate in the industry due to the narrow definition of ‘greyhound racing industry participant’. We support the expanded definition of a greyhound racing industry participant as proposed in the draft regulations.

**The proposed register of greyhounds is insufficient**

It is critical that the regulations provide for life cycle tracking of individual greyhounds. The proposed regulations would require the GWIC to keep registers of registered greyhounds but does not provide tracking of greyhounds that have been adopted. This would allow an owner to ‘adopt’ out an animal to a relative or associate who would then be free to dispose of the animal. In our view this is a significant loophole in the regulations and needs to be closed. One practical way to do this may be to only allow an animal to be registered as adopted if they are adopted through appropriate greyhound adoption agencies.

**Annual reporting requirements are insufficient**

From a transparency, accountability and public trust perspective, it is critical that the GWIC provides the public with information to properly assess the racing industry’s treatment of the animals in its care and the GWIC’s oversight of the industry. In our view this should include disclosures (on an annual basis) of:

- the number of dogs that have died or been euthanised (and the reason),
- the number of dogs that have been retired or exited the industry (and where they went),
- the number of dogs that have been exported (although we think this should be banned or heavily restricted),
- the number of dogs that have been surrendered to another agency (and the reason), and
- the GWIC’s use of its investigation and enforcement powers. We think it important that the public has confidence in the GWIC’s oversight of the industry and this can only be achieved if the GWIC is transparent in how it investigates greyhound racing participants and discloses the enforcement action it has taken. In other contexts where there is a risk of exploitation of vulnerable people or animals (such as in aged care, or in human rights and animal welfare supply chain assessments) the use of unannounced audits is considered one of the more effective tools for identifying illegal or unethical conduct.

In addition, the industry should disclose the number and the nature of charges (perhaps without naming the individuals) laid against industry participants relating to the treatment of greyhounds, such as abandonment or
drug offences. There should also be disclosures relating to Greyhound as Pets, including how many dogs are euthanised in their care.

We support the increase in powers relating to information sharing

Information contained on registers should be shared with animal welfare bodies, law enforcement and other Government agencies and bodies. This is important to ensure that greyhound racing participants who engage in animal cruelty, live baiting and other criminal acts are identified and the animals whose lives are at risk can be saved.

Penalties need to be high enough to be a deterrent

It is important that the GWIC is properly armed to effectively deter, prosecute and punish those who are engaged in animal cruelty to improve community confidence, particularly having regard to the findings of the Special Commission of Inquiry into the Greyhound Racing Industry in NSW, the lack of community confidence, the need to lift standards in the industry, and the need to prevent animal cruelty. The penalties proposed are manifestly inadequate to achieve this, particularly having regard to the fact owners are paid appearance money for each dog they put in the race, which could offset a penalty; industry participants may have other financial incentives to not comply with law and regulations; and there has been historically poor enforcement of animal welfare protections in this industry which may mean industry participants think there is a good chance their contravening conduct will not be detected. Civil and criminal penalties and infringement notices for many insider trading and corporate offences have significantly increased recently, partly to take account of the fact that wrongdoing of this type is often difficult to detect and prosecute. Similar considerations apply in this context.

We strongly recommend a review of the penalties to demonstrate the commitment of the government to stamp out illegal and cruel practices, setting the penalties at a level that will have a real deterrence effect, rather than being regarded as a risk worth taking.

We thank you again for the opportunity to contribute to this inquiry and we hope it will result in genuine improvements to the treatment and welfare of greyhounds in NSW.

Yours sincerely

Phil Vernon
Managing Director

T 612 8276 6243 | M 0407 169 528 | E pvernon@australianethical.com.au
Online submission: on the proposed Greyhound Racing Regulation 2019

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Thu, Jul 18, 2019 at 7:36 PM
To: @racing.nsw.gov.au

Your details
First name:
Last name:
Organisation:
Postal address:
Suburb:
State:
Postcode:
Email:
Contact phone number:

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):

These reporting requirements are UNACCEPTABLE. There is no transparency. It is designed to prevent members of the public from knowing how many greyhounds are killed by the industry. It MUST include the number of dogs killed each year following racetrack injuries or being deemed "unsuitable to rehome" by the industry funded adoption program, GAP. GRNSW MUST include these "unsuitable" dogs in reporting and the dogs MUST be trackable.

Registration of greyhounds, industry participants, trial tracks:

Div 1 s8 needs to include a proviso that the registration of a companion greyhound to a racing participant or associate also carry lifetime tracking of the dog. It's a well known loophole whereby participants register unwanted dogs as companion animals to circumvent the euthanasia reporting provisions. Div2- s11 is supported Div2 s12-needs a mandatory "good character" test for prospective participants. Similarly Div 2 s14. An industry that counts members of outlaw motorcycle gangs, drug cheats and criminals amongst its participants is a poor excuse for an industry in this century.

Registration of greyhound racing clubs:

no comment

Penalties:

The penalties are woefully inadequate and need to be strengthened as a deterrence for the many participants who drug their greyhounds and engage in race fixing, dog neglect and greyhound cruelty. The ability to appeal the penalties needs to be curtailed.

Div4-the NSW government promised a puppy bond, to help the independent rehoming organisations. There is NO lifetime tracking of greyhounds as promised. Lifetime tracking MUST be mandatory. Div 4 s20- supported, to allow racing participants who engage in live baiting etc to be identified and prosecute

Other issues:

Privacy & confidentiality

Publication of your details: Publish my submission but do not publish my name

Acknowledgement: I agree to the above statement.
We recommend expanding the annual reporting requirements of the Greyhound Racing Welfare Integrity Commission. • The current proposal lacks transparency and does not allow the public and interested stakeholders to accurately assess and understand the negative animal welfare outcomes of greyhound racing. • We recommend proactive release of information by GRNSW and GWIC, as encouraged and stipulated by the Government Information (Public Access) Act 2009 (GIPA). • We propose that GWIC be required to publish comprehensive statistics in its annual report, including the following: - Greyhounds Euthanised: ○ Euthanised due to injury ○ Euthanised due to illness ○ Euthanised due to age ○ Euthanised by a registered vet on-track from an injury ○ Euthanised due to being deemed 'Not Suitable for Re-homing' ○ Euthanised due to Unsuccessful Re-homing ○ Greyhounds Registered as leaving the industry ○ Greyhounds retired as a pet to self (participant) ○ Greyhounds retired by the participant to a private person (non-participant) ○ As a pet through Greyhounds as Pets ○ Greyhounds Exported, including destination countries. ○ Surrendered to another agency, such as RSPCA NSW or a Council facility (including details of participants charged by GWIC as a result of abandoning the animal and whether or not that animal is euthanized at that facility). - Deceased from track injuries (reported by GWIC as ‘sudden deaths’) - The details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed. GWIC should also publish any transfers of greyhounds that happen after an individual is charged with a drug offence. • We are concerned about the lack of transparency of the Greyhounds as Pets program, specifically the high failure rate of greyhounds tested and unacceptable euthanasia rates of greyhounds in the care of Greyhounds as Pets. We have a keen interest, as does the public, government regulators and funding bodies, in understanding how Greyhounds as Pets operates, and the extent to which the industry (via Greyhounds as Pets) is enacting genuine reform and safeguarding of animal welfare. • Greyhound Racing NSW should be required to publish how many greyhounds were tested by Greyhounds as Pets, the failure rate, how many dogs are euthanised in the care of Greyhounds as Pets and how many dogs that have failed the Greyhounds as Pets assessment are subsequently put down. • We believe the proposed reporting requirements are insufficient as they allow for the continued reporting of information which is misleading and fails to disclose the full and accurate outcomes for greyhounds processed via Greyhounds as Pets. • This information will ultimately allow for GWIC and GRNSW to fully understand, assess, and improve the Greyhounds as Pets program and the industry’s animal welfare efforts. We strongly support the increase in powers to share information contained on registers with animal welfare bodies, law enforcement and other government agencies and bodies. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other criminal acts to be identified and prosecuted and to save the lives of animals who are at risk.

Registration of greyhounds, industry • The proposed register does not facilitate lifetime tracking, which was a key recommendation by the Special Commission of Inquiry into the Greyhound Racing Industry in NSW and the Greyhound Industry Reform Panel, and as proposed by Greyhound Racing NSW (GRNSW). •
The proposed register does not track greyhounds once they become adopted / transferred to the companion animal register. We are concerned that this creates a viable loophole which will enable owners to easily dispose of greyhounds via transferring ownership of the greyhound as a pet (either as their own pet, or adopted by a family member or associate), allowing the animal to be euthanised. • The industry, government, and stakeholders acknowledge that rates of euthanasia remain unacceptably and unsustainably high. The current proposal will increase the risk of continued unnecessary greyhound deaths, and fails to safeguard and provide oversight for vulnerable greyhounds who are deemed unsuitable for racing. • The industry and the Greyhound Racing Welfare Integrity Commission (GWIC) must understand and have oversight over the true and ultimate fates of all racing greyhounds. For example, many greyhounds deemed by the Greyhounds as Pets program to be ‘unsuitable for re-homing’ are commonly advertised to give away for free on websites such as Gumtree, by owners who state that they are unable to continue to care for the greyhound. Lifetime tracking is essential to ensure such vulnerable greyhounds do not ‘fall through the cracks’ of scrutiny, which has been the case for too long. • We strongly recommend the register be made available to the public online.

Registration of greyhound racing clubs:

Penalties:

Other issues:

The Regulation should include the clear provision for introduction of a Puppy Bond. A key part of the Greyhound Industry Reform Panel was the introduction of a ‘puppy bond’. This recommendation was issued more than two years ago and is yet to be adopted.

Privacy & confidentiality

Publication of your details: Publish my submission but do not publish my name

Acknowledgement: I agree to the above statement.
Online submission: Maria Salome Rocha Luna on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au>  Thu, Jul 18, 2019 at 8:06 PM
To: @racing.nsw.gov.au

Your details
First name: Maria Salome
Last name: Rocha Luna
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):

The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent.

We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as 'unsuitable to be rehomed'. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry 'Greyhounds as Pets' program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required.

The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhounds, industry participants, trial tracks:

The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other crimes.

Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.
Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent.
We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required.
The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.
The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other crimes...
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution. The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live bailing or other crime.
Online submission: Eleanor Sum on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Thu, Jul 18, 2019 at 8:55 PM

To: racing.nsw.gov.au

Your details
First name: Eleanor
Last name: Sum
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare are unacceptable and seem designed to prevent the public knowing how many dogs are killed by this industry. They should be required to be much more transparent since both of these bodies are established in law and supported through the public money the NSW Government gives to the industry. It has been documented that hundreds of dogs are killed each year after suffering treatable injuries or being deemed as 'unsuitable to be rehomed'. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason. GRNSW should also report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

Registration of greyhounds, industry participants, trial tracks:
I strongly support the proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government's promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

Other issues:
The proposal for information sharing is strongly supported. The Regulation fails to clearly establish a puppy bond, as was promised by the NSW Government. The Regulation should include the clear provision for introduction of a Puppy Bond.

Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.
Dear Sir/Madam,

RE: DRAFT GREYHOUND RACING REGULATION 2019

Thank you for the opportunity to make a submission in relation to the above. This Regulation should provide stringent and extensive operating requirements for the greyhound industry – if the preferred option of banning racing is not adopted.

My comments on the identified areas of the Regulation follow.

1. Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW

Given public outcry regarding the number of greyhounds killed in the industry, and that Greyhound Racing NSW (GRNSW) has admitted ‘these [wastage] figures are still shocking and unacceptable’ (24/05/2018, GRNSW News), transparency should be broader and at a minimum include statistics of greyhounds killed each year and the reasons for such “wastage”. This should include after greyhounds are rehomed, noting that the loophole described below would allow the industry to warp the statistics by “rehoming” greyhounds before euthanasia.

2. Registration of greyhounds, industry participants and trial tracks

The broader definition of greyhound racing industry participant is supported as providing more avenues for the monitoring of the welfare of greyhounds in the racing industry. However s8 should be amended to provide for registration of a greyhound for life. The current drafting provides a loophole for the industry to adopt greyhounds out to themselves or associates in order to euthanise those animals without reporting requirements.

3. Registration of greyhound racing clubs

No comment.

4. Penalties

The penalties prescribed are paltry and disproportionate to the offences committed. For example offences under s42 carry penalties of only $275 for a first offence or $550 for any
subsequent offences, yet the registration of a greyhound and compliance with the conditions of its registration (as this section requires) are the cornerstone of the protection of greyhounds and the regulation of the industry and therefore of utmost importance. A well regulated industry that supports best practice should deter non-compliance with heavy penalties, particularly for re-offending behaviour.

The penalties as a whole provide an inadequate deterrent and seem, if anything, likely to encourage non-compliance by providing less harsh penalties than provided for under the Act. Relative to the financial gain of the industry, and the recent exposure of common illegality in the industry and problems with monitoring, it seems likely that without the penalties being significantly increased, industry participants may choose to take the “gamble” or even “pay the price” to not comply.

5. Other issues

It is supported that s20 allows the Commission to provide information to other bodies, however it is noted that the Commission is not compelled to provide that information and may refuse to provide information requested provided that reasons for the refusal are supplied. If the industry is to be transparent and has “nothing to hide”, the refusal should only be permitted on reasonable grounds or a similar benchmark, rather than at the sole discretion of the Commission.

Further, GRNSW and the NSW Government supported that puppy bonds be established, yet this appears to have been overlooked in the Regulation. This should be incorporated as an additional safeguard in the industry.

In summary the Regulation does little to provide reassurance that the industry will be adequately monitored and controlled.

The harm done to the greyhounds in the industry though cruel practices, injuries and becoming waste products is disproportionate to the benefits of the industry.

The public interest is that community expectations regarding the humane treatment of greyhounds be the paramount consideration over the vested financial interests of stakeholders in the industry. Greyhound racing should be banned in NSW, as was previously announced and as has been enacted in other jurisdictions.

If greyhound racing is not to be banned, then strict and rigorous monitoring and regulation are necessary to ensure that the practices are the “least cruel” they can be, and that breaches are picked up and severely penalised to discourage future offending conduct. All of this should be done at the cost of the industry, not the taxpayers; I do not support the taxes I pay being used to subsidise a wealthy and inherently cruel industry.

Thank you for your consideration.

Regards,
Dear Sir/Madam,

Thank you for the opportunity to make a submission regarding the Greyhound Racing Regulation 2019. After many years as a greyhound foster carer, I believe the industry should be shut down, mainly due to poor animal welfare and public deception. There remains unacceptable high death and injury rates within the industry, with the huge problem of overbreeding remaining. The ‘puppy bond’ that was promised by the Industry Reform Panel has yet to be implemented, which would aid in ensuring limited breeding and help improve the welfare for all greyhounds bred into the industry. This ‘puppy bond’ is absolutely essential in moving forward.

I am incredibly angry that public money is still being given to the industry, despite little change since the McHugh report (2016) and the subsequent formation of the Welfare Panel, and are hugely concerned that while racing continues, greyhounds will ultimately suffer.

The annual reporting, and reporting in general, remains exceptionally poor and is more evidence of industry deception. It appears to hide specific reasons for euthanasia and post retirement destinations. There is currently inadequate documentation regarding the outcomes for these dogs. It also fails to record dogs that have been and still are being, exported overseas, including their location. Unless the dogs are tracked for life, their future outcome can be compromised. Another promise that has yet to be implemented.

Information needs to be available to the public in order to gain any trust in the industry. With the public sharing of industry information, including participants that have been involved in criminal acts, especially animal cruelty, greyhounds may have a greater chance of protection. This would aid in the elimination of these individuals from the industry and improve overall welfare and public perception. Greyhound Racing also needs to increase penalties for breeches of the Greyhound Racing Act 2017, thus acting as a deterrent and showing the public that the industry is serious about earning back respect.

Currently the GWIC have failed in monitoring racing participants, whilst appearing reluctant to implement many of its own recommendations. I feel extra money from the industry, not the taxpayer, would allow for greater competency, control and power in this area, especially regarding animal cruelty and appropriate medical treatment of the dogs. The term ‘Greyhound racing participant’ needs to include all persons involved in the industry, from owners, investors, handlers and officials, to those who provide care and veterinary assistance to the dogs. As an independent regulator, they need increased industry support to penalise those participants tarnishing the industry, no matter who they are.

Thank you for your time,
Submission responding to the proposed  
Greyhound Racing Regulation 2019

Overview

This submission provides feedback to the NSW Government on Greyhound Racing Regulation 2019, under the Greyhound Racing Act 2017.

About the Greyhound Clubs NSW

Greyhound Clubs NSW (GCNSW) was formed in 2018 as part of the Greyhound Clubs Australia umbrella. GCNSW looks to continue the work of the ‘Alliance’ formed in 2016 which worked to overturn the Greyhound Prohibition Bill.

All NSW TAB Clubs are members of GCNSW.

Impact; assessment of options

Preferred Option: Option 2 – Maintain the Status Quo

GCNSW believes that it is necessary to maintain the status quo, extending the 2018 Regulation and transitional provisions, for a period of twelve months.

Whilst the GCNSW appreciates the importance for the continued the implementation of the NSW Greyhound Industry Reform Panel’s recommendations, it is the view of the GCNSW that this needs to be staged accordingly. The NSW greyhound racing industry is still going through the process of establishing its current footprint. At the time of writing this submission, the registration process in NSW is yet to be finalised. Given this and the range of regulatory and process changes still in train the GCNSW believes strongly in an extension of the current Regulation.

The revised NSW Code of Practice is expected to commence consultation in the near future which will result in the need for additional modification and adjustment. For Clubs consultation on minimum track standards and facilities is currently being undertaken, as
well as Clubs and Track audits. Given this critical industry consultation is still in process, and form a strong part of the Draft Regulations, it is imperative an extension is undertaken.

The successful implementation of the regulation framework, and the overall reform of the greyhound racing industry is dependent on the active engagement of our Clubs and participants in the change process. Therefore, it is essential we structure changes within a timeframe that will enable all stakeholders to be fully engaged in the journey.

As a consequence of the above concerns and current industry concerns with the draft Regulations, the GCNSW strongly recommends the current regulation be extended for a period of twelve months, following which implementation of the new regulation be undertaken.

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**Option 1 – Make the proposed regulation**

Option 1 is not the preferred option of the GCNSW at this stage, due to the reasons as outlined above. Notwithstanding the above position, the GCNSW has outlined its concerns with the proposed regulations within the below table to aid in the development of a future draft.

The GCNSW understands that a range of stakeholders have already made submissions that reinforce the below points;
### GCNSW Submission to Greyhound Racing Regulation 2019

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<tr>
<td>Part 1 Preliminary</td>
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</table>
| 3(1) | Definition of *greyhound racing industry participant*:  
(e) a person who provides such health services to greyhounds as are prescribed by the regulations.  
(f) any other person who is of a class of persons associated with greyhound racing that is prescribed by the regulations for the purposes of the definition. | 11(1) | Expands the definition of greyhound racing industry participant to include persons who are not veterinarians but provide health services to a greyhound. | • The GCNSW supports the registration of officials operating at race meetings, however raises concerns regarding the burden of costs. Staff and volunteers who are required to be registered due to the nature of their employment should not have to bear the burden of costs. At the current time Club funding and prizemoney returns are not sufficient to sustain increased costs of compliance.  
Roll out timelines are also a concern on the implementation of this regulation. |
| | | 11(3) | Expands the definition of greyhound racing industry participant to include:  
• persons who handle a greyhound  
• persons who artificially inseminate greyhounds  
• proprietors of trial tracks  
• officials at a trial track or race (starters, judges and lure operators)  
• persons who offer, or invite applications for, an interest in a greyhound  
• persons who manage the ownership of a greyhound on | |
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<tr>
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<td></td>
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<td>behalf of two or more other persons who, jointly, own the greyhound</td>
<td>implementation and compliance. GCNSW believes the draft plan for the licencing framework, education and Code of Practice are first required before progression of Regulations, to aid industry engagement and consultation. Through this work the GCNSW believes industry stakeholders would be able to understand recognition of other formal qualifications as part of obtaining a licence. This might include members of Chiropractic or Physiotherapy profession, which have undertaken further study of animal physiology. This understanding would ease current concerns with the draft regulation.</td>
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<td>• GCNSW believes strongly that an owner, particularly those within syndications, should be exempt from formal police checks. GCNSW supports the needs for fit and proper tests for Syndicate Managers and persons which are to take care and control of a greyhound. Given however a fit and proper test does not apply to</td>
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July 19, 2019

GCNSW response to draft Regulation
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<thead>
<tr>
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<td>ownership within other racing codes or for persons owning greyhounds after their racing careers, GCNSW does not believe this imposition should apply on all owners. Given current industry demographics, it is important to make the industry accessible for overall feasibility. This currently hinders greyhound ownership.</td>
</tr>
<tr>
<td>Part 2 Greyhound Welfare and Integrity Commission</td>
<td>10(c) Provides for the Commission to delegate functions to any person or body prescribed in the regulations.</td>
<td>4</td>
<td>Delegates the functions of the Commission to a committee established under section 13 of the Act.</td>
<td>Supported.</td>
</tr>
</tbody>
</table>
| 15(b)  | Provides that the annual report of the Commission must include a report on the implementation of the Commission’s strategic plan and other matters required by the regulations. | 5 | Expands annual reporting requirements for the Commission. | To support industry transparency, GCNSW would support further reporting requirements in line with NSW Government sector. This may include:  
- Human Resource levels and banding  
- Complaints made against the organisation to external parties |
<table>
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<tr>
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<tr>
<td>Part 3 Greyhound Racing New South Wales</td>
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<tr>
<td>28(3)</td>
<td>Prescribes the annual reporting requirements of GRNSW to include such other particulars contained in regulations.</td>
<td>6</td>
<td>Expands annual reporting requirements for GRNSW.</td>
<td>To promote industry transparency, the GCNSW would support further reporting requirements in line with NSW Government sector. This may include:</td>
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<tr>
<td>Part 5 Control and regulation of greyhound racing industry</td>
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<tr>
<td>48(1)</td>
<td>Prescribes the Commission authority to register greyhounds in accordance with the regulations.</td>
<td>7 &amp; 8</td>
<td>Proposes the Commission’s registration process for a greyhound.</td>
<td>GCNSW believes current fees are already onerous upon participants and therefore the implementation of a yearly keeping of greyhounds’ fee is not be supported. Lifetime registration should instead be maintained.</td>
</tr>
<tr>
<td>49(1)</td>
<td>Prescribes the Commission</td>
<td>12 &amp; 13</td>
<td>Proposes the Commission’s</td>
<td>GCNSW supports registrations being extended to three</td>
</tr>
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</table>

July 19, 2019 GCNSW response to draft Regulation 6
<table>
<thead>
<tr>
<th>Section</th>
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</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>authority to register industry participants in accordance with the regulations.</td>
<td></td>
<td>registration process for industry participants.</td>
<td>years.</td>
</tr>
<tr>
<td>50(1)</td>
<td>Prescribes the Commission authority to register trial tracks in accordance with the regulations.</td>
<td>16 &amp; 17</td>
<td>Proposes the Commission’s registration process for trial tracks.</td>
<td>Supported, however given GRNSW currently oversee track maintenance and some minor funding to trial tracks, the mechanics of this needs further attention.</td>
</tr>
<tr>
<td>53(1)</td>
<td>Prescribes GRNSW authority to register racing clubs in accordance with the regulations.</td>
<td>21 &amp; 22</td>
<td>Proposes GRNSW’s registration process for racing clubs.</td>
<td>Clause 22(1) The GCNSW recommends the registration period for greyhound racing clubs be extended to five years. This is to ensure industry certainty and confidence. It is imperative that Club Boards and management be afforded the opportunity to make medium to long term planning and return on investment decisions with racing certainty available to them.</td>
</tr>
</tbody>
</table>

Part 9 Miscellaneous

| 92      | Provides the Minister power to delegate functions to a person or body defined in the regulations. | 24 | Proposes for the Minister’s delegation to apply to the Executive Director, Liquor, Gaming and Racing, Department of Customer Service. | Supported. |

July 19, 2019 GCNSW response to draft Regulation
<table>
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<tr>
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</thead>
<tbody>
<tr>
<td>96</td>
<td>Enables offences under the proposed Act or the regulations to be dealt with by way of penalty notices.</td>
<td>Schedule 1</td>
<td>Proposes each offence for which a penalty notice may be issued and the amount payable under any such penalty notice.</td>
<td>Schedule 1 - Penalties Section 39 – Contravene provision of Code of Practice known as “offence provision”. Given that the new Code of Practice has yet to be released for public consultation, GCNSW is unable to make comment on the reasonableness or otherwise of the penalty suggested. This further enforces GCNSW’s overall view that the status quo should remain, and the 2018 regulation be extended for twelve months.</td>
</tr>
<tr>
<td>100</td>
<td>Provides the Chief Commissioner or chief executive officer of the Commission to certify evidence for relevant matters as prescribed by the regulations.</td>
<td>25</td>
<td>Expands the relevant matters that can be certified as evidence.</td>
<td>Supported.</td>
</tr>
<tr>
<td>101(2)(a)</td>
<td>Provides for the making of applications for the registration of greyhounds, industry participants, racing</td>
<td>7, 12, 16 &amp; 21</td>
<td>Proposes authority for the Commission to accept applications and fees for the registration of greyhounds, industry participants,</td>
<td>Supported.</td>
</tr>
<tr>
<td>Section</td>
<td>Regulation making power under the Act</td>
<td>Clause</td>
<td>Scope of the proposed regulation</td>
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<tr>
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<td>clubs and trial tracks (including application fees) to be prescribed by regulation.</td>
<td></td>
<td>racing clubs and trial tracks.</td>
<td></td>
</tr>
<tr>
<td>101(2)(b)</td>
<td>Provides for the making of regulations for any matter relating to the registration of greyhounds, industry participants, racings clubs and trial tracks.</td>
<td>8, 13, 17 &amp; 22</td>
<td>Proposes the terms and duration of registration for greyhounds, industry participants, racing clubs and trial tracks.</td>
<td>13(1) GCNSW is supportive of a three-year licence period for participants. 22 (1) Registration of Greyhound Clubs should be extended to five years to provide for club stability and allow clubs to make long term financial decisions, conditional upon meetings Club Governance and Standard requirements.</td>
</tr>
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<td></td>
<td>15(1) 18(1)</td>
<td></td>
<td>Specifies that industry participants and proprietors of trial tracks must provide certain information and details to the Commission for the purposes of registration.</td>
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<tr>
<td>101(2)(c)</td>
<td>Provides for the making of regulations in respect of the identification of greyhounds.</td>
<td>9(a)</td>
<td>Proposes specific conditions for the identification of a greyhound to apply to the registration of a greyhound.</td>
<td>Supported.</td>
</tr>
<tr>
<td>101(2)(d)</td>
<td>Provides for the making of regulations requiring the</td>
<td>19</td>
<td>Proposes to require the Commission to keep registers of registered</td>
<td>19(2) GCNSW is concerned with the level of detail that is to be kept in registers, given the sharing of</td>
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<tr>
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<tr>
<td></td>
<td>Commission to keep registers containing information about greyhounds, industry participants and trial tracks.</td>
<td>20</td>
<td>greyhounds, industry participants and trial tracks.</td>
<td>information available under Clause 20. GCNSW recommends that the data kept within registers should be limited and records cleaned regularly to ensure current data is maintained.</td>
</tr>
</tbody>
</table>
| 101(2)(e) | Provides for the making of regulations to specify the bodies the Commission is allowed to share information containing within a register. |        | Proposes for the Commission to share information from registers with specified bodies, including animal welfare groups, GRNSW, local councils, law enforcement and government agencies. | GCNSW is extremely concerned with the operation of this clause, and the potential for the privacy of participants to be breached through the sharing of information available on the registers. 
Whilst GCNSW appreciates that information sharing needs to occur in relation to the investigation and prosecution of animal welfare related matters, or to assist in rehoming efforts, the need to protect the privacy of participants is paramount. 
In particular, GCNSW is concerned with the role of the RSPCA and Animal Welfare League, given their conflicted role as both inspectorate within the industry as well as vocal animal welfare lobbying group. 
GCNSW needs to be assured that the privacy of participants and officials are maintained and information shared from the Commission is used strictly for specific purpose. |
<table>
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<tr>
<td>101(2)(i)</td>
<td>Prescribes the making of</td>
<td>14</td>
<td>Proposes specific conditions on</td>
<td>14(c) GCNSW is concerned with the making of policies</td>
</tr>
</tbody>
</table>

GCNSW recommends:

- That the Commission limits the detail being contained within registers which will be available for data sharing;
- GCNSW does not see the need for open sharing of any information with the bodies listed 20(1)(g) through to (j) as these are not relevant to the functions of the Commission or in line with the recommendations of the reform panel;
- That the sharing of information to the bodies listed is limited to only detail confirming that the participant is a registered participant, greyhound or trial track;
- That the Commission has in place a strong privacy policy that outlines to participants how their data is collected, held, and what the remedies are in case of a breach.
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<tr>
<td></td>
<td>regulations to specify conditions to which the registration of industry participants apply.</td>
<td>10(1)</td>
<td>Proposes several notification requirements for industry participants to include where there is a change of ownership, a change in premises of a greyhound, the death of a greyhound and where the greyhound ceases to be a greyhound for which the Act applies.</td>
<td>10(3)(a) GCNSW recommends the timeframe for change in ownership be extended to 7 days to provide for participants to have undertaken transport of the greyhound and confirmed the greyhound has safely arrived.  10(3)(b) GCNSW recommends the timeframe for a change in the premises extended to 7 days to provide for participants to have undertaken transport of the greyhound and confirmed the greyhound has safely arrived.</td>
</tr>
<tr>
<td>101(2)(j)</td>
<td>Provides for the notification requirements for registered greyhounds to be specified by the regulations.</td>
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GCNSW and participants need to be assured that policies drafted by the Commission will go through the NSW Government policy development framework, including adequate consultation and evidence which allows for comprehensive participant feedback prior to implementation.
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<tr>
<td>101(5)</td>
<td>Enables the regulations to create an offence punishable by a penalty not exceeding 100 penalty units.</td>
<td>10(3)</td>
<td>Proposes offences relating to an industry participant’s failure comply with relevant notification requirements.</td>
<td>Notification requirements should be extended to 7 days to enable participant to transport the greyhound.</td>
</tr>
<tr>
<td></td>
<td>15(3)</td>
<td></td>
<td></td>
<td>23(1) At times it is necessary for individuals who are not greyhound racing participants to enter participant only areas at greyhound tracks. For example, sponsors of greyhound races, special guests invited to undertake presentations, performers, educators, media, maintenance etc. GCNSW recommends that an extension of this clause is necessary to provide the stewards, and the registered club with capacity to authorise entry to participant only areas, with appropriate identification required.</td>
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<tr>
<td></td>
<td>18(3)</td>
<td></td>
<td>Proposes an offence for a person to enter a participant only area at a licenced racecourse or greyhound trial track unless they are a registered industry participant.</td>
<td>GCNSW would also raise the cost to implement security to manage the regulation requirements.</td>
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<td>23</td>
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<td>Finally, GCNSW would raise at the current time the regulations do not allow GWIC to warn off a non registered person from all tracks, where behaviour has been in appropriate at a NSW venue. GCNSW believes</td>
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<tr>
<td>Section</td>
<td>Regulation making power under the Act</td>
<td>Clause</td>
<td>Scope of the proposed regulation</td>
<td>GCNSW Response</td>
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<tr>
<td>Schedule 4, Part 1, Clause 1</td>
<td>The regulations may contain provisions of a savings or transitional nature consequent on the enactment of this Act or any Act that amends this Act.</td>
<td>Schedule 2</td>
<td>Proposes savings and transitional provisions apply to all forms of registration, renewal of registration and conditions. The regulation extends the transition period in clause 8 of Schedule 4 to 1 July 2020. This provides the Commission opportunity to remake the Rules.</td>
<td>Extension of 2018 regulation has been proposed by GCNSW. Further work on the licencing framework is required before understanding a future position.</td>
</tr>
</tbody>
</table>

there is merit in consideration of this.
<table>
<thead>
<tr>
<th>Part, Division, Clause</th>
<th>Submission(s)</th>
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<tbody>
<tr>
<td>Part 3 Division 1, Clause 8</td>
<td>There is no particular reason in our view that a greyhound could not be registered by the Greyhound Welfare and Integrity Commission (<em>the Commission</em>) and also appear on the companion animals register. Consequently, we believe subclause (b) need not be included.</td>
</tr>
</tbody>
</table>
| Part 3 Division 1, Clause 9 | There are welfare issues associated with ear tattooing and while this is currently done it may change in the future for welfare reasons. Consequently, the possible use of other methods should be covered. The ear brand requirement exists in the Rules 111 and 111A of the Commission.  
  
  Suggest subclause (b) be amended to read as follows:  
  "(b) an additional method of uniquely identifying the greyhound approved by the Commission."
  
  This way all that is required to vary it will be the Commission varying the rules.                                                                                                                                                                                                                                                                                                                                     |
| Part 3 Division 1, Clause 10| The clause should require the provision of information concerning the breeding and whelping of a greyhound.                                                                                                                                                                                                                                                                                                                                                                                      |
| Part 3 Division 2, Clause 11| Subclause 2(b) appears to imply that all sorts of health services could be provided by the owner. The wording probably needs to change so that it reflects the management of the health and well-being of the greyhound directly or under the direction of a health services provider. Furthermore it is often a trainer, whelper or rearer that will manage the health and well-being not just the owner.  
  
  Subclause 3(d) is incomplete and should include swabbing and have an all-inclusive reference such as other official duties as identified by the Commission.  
  
  Subclause 3(e) may be problematic in that an entity may offer an interest in a greyhound where syndication is proposed. Entities involved have been previously been referred to as a promoter. Suggest subclause 3(e) be amended to allow promotion for syndication.                                                                                                                                                                                                                       |
| Part 3 Division 2, Clause 14 | Subclause 14(c) is restricted to welfare. Suggest amending it to broaden the reach by adding "and any other policies" between the words "greyhounds" and "published". |
| Part 3 Division 4, Clause 19 | Subclause 19(1) does not cover all register needs. There is a need to add to such register a register of breeding and whelping events and a register of retired greyhounds. |
| Part 3 Division 5, Clause 21 | Subclause 21(1) assumes a greyhound racing club already exists. The formation of a greyhound racing club may be dependent on the ability to become registered and the person (or persons) proposing the club need some clarity in advance. Suggest the wording of subclause 21(1) be amended by inserting the words "on behalf of an existing greyhound racing club or proposed greyhound racing club" be inserted between "apply" and "to". |
| Part 4, Clause 23 | Subclause 23(1) is far too restrictive as it restricts access to restricted areas to registered greyhound racing industry participants only. That does not provide a mechanism for other persons that may be legitimately authorised to be there. There are several Commission and GRNSW staff who may have legitimate reasons for being in restricted areas. In addition, veterinary surgeons are not greyhound racing industry participants but are needed. Taken literally, the clause even precludes stewards and even the Commission’s Commissioners entering a participant only area as they are not greyhound racing industry participants. The clause needs to be amended to allow certain persons including specified Commission, GRNSW, Club management and other persons who have reason to access participant only areas to be authorised to do so. The Chief Steward and/or the Senior Steward at a particular greyhound race meeting should have the delegation to allow one-off access to these areas on a case by case basis. |
Feedback submission - Greyhound Racing Regulation 2019

1 message

Fri, Jul 19, 2019 at 1:34 PM

to: racing.admin@racing.nsw.gov.au

1. Support for expanding the definition of a greyhound racing industry participant.
   Approve.

2. Proposed register of greyhounds.
   Fails on lifecycle tracking; register must be made public.

3. Information sharing.
   Approve.

4. Penalty Infringement Notice (PIN) penalties.
   Too weak.

5. Puppy bond.
   Fails to establish.

Please publish my submission but do not publish my name.

Regards, [Redacted]
To Whom it may concern

Dear Sir/Madam

We the undersigned greyhound racing participants have great concerns and are alarmed by the recent GWIC proposed policy changes. In particular we are disturbed by the following data sharing policy. We recently were required to renew our Registration with GWIC and there was no mention that our personnel information would be shared with other departments. The RSPCA and the Animal Welfare league have both been instrumental in trying to shut our industry down so our concern is how this information will be used, also if members decide to no longer participate in Greyhound racing what will happen to our personnel information, will it be shared with other organizations? I have personally been a victim of IDENTITY fraud and my wife and I now have to prove who we are.

The RSPCA are a business that have millions of dollars invested and kill thousands of DOGS and Cats every year yet they persecute Greyhound Racing because of a couple of bad apples. PLEASE don’t allow our personnel information to be Shared. If the Animal Welfare League were to release any details of Greyhound members to animal activists our rights will be diminished.

quote

Commission to keep registers
(1) The Commission is to keep registers of the following: (a) registered greyhounds, (b) registered greyhound racing industry participants, (c) registered greyhound trial tracks.

20 Commission may share information in registers
(1) The Commission may share information contained in a register kept by the Commission under this Division with the following:

(a) the RSPCA,
(b) the NSW Animal Welfare League,
(c) a council (within the meaning of the Local Government Act 1993),
(d) GRNSW, (e) the NSW Police Force, the Australian Federal Police or the police force of another State or a Territory,
(f) a body that, under the law of the Commonwealth, another State or a Territory, is responsible for the control or management of greyhound racing or the racing of other animals, in that jurisdiction,
(g) the Australian Financial Security Authority,
(h) the Australian Securities and Investments Commission,
(i) the Australian Transaction Reports and Analysis Centre,
(j) a government sector agency of the State or the Commonwealth.

(2) A person or other body referred to in subclause (1) may request access to information contained in a register kept by the Commission under this Division.
(3) If the Commission refuses a request for access to information contained in a register the Commission is to provide reasons for the refusal.
Submission responding to the proposed
Greyhound Racing Regulation 2019

Overview

This submission provides feedback to the NSW Government on the Greyhound Racing Regulation 2019, under the Greyhound Racing Act 2017.

About the NSW GBOTA

The NSW Greyhound Breeders, Owners and Trainers (NSW GBOTA) is a member organisation that provides services to its membership relating to participation in the greyhound racing industry. These services include provision of commercial racing operations and advocacy in the interests of its membership.

NSW GBOTA is governed by a Board of Directors and professional management based at Wentworth Park, Glebe. Further information is available at the NSW GBOTA website: http://www.gbota.com.au/.

NSW GBOTA operates greyhound race meetings throughout NSW, including at the State's premier greyhound track Wentworth Park, the sole metropolitan venue in NSW. TAB operations include Bulli, Bathurst, Gosford, Lismore and Maitland, as well as TAB/non-TAB operations at Gunnedah and Temora. Appin Way is also utilised as a training facility.

NSW GBOTA also operates a network of branches throughout NSW (25 in total) which provide greyhound racing participants with the opportunity to meet on a monthly basis and progress issues of significance to the industry and discuss their ongoing participation.
Impact; assessment of options

Preferred Option: Option 2 – Maintain the Status Quo

The NSW GBOTA believes that it is necessary to maintain the status quo, extending the 2018 Regulation and transitional provisions, for a period of twelve months.

Whilst the NSW GBOTA appreciates the importance of continuing the implementation of the NSW Greyhound Industry Reform Panel’s recommendations, it is the view of the NSW GBOTA that this needs to be staged accordingly. The NSW greyhound racing industry is still going through the process of establishing its current footprint. At the time of writing this submission, the registration process in NSW is yet to be finalised. Given this and the range of regulatory and process changes still in train the NSW GBOTA believes strongly in an extension of the current Regulation.

The revised NSW Code of Practice is expected to commence consultation in September 2019, which will result in the need for additional modification and adjustment. Further, the draft regulations propose to impose severe penalties related to offence provisions contained within the Code of Practice, which has not yet been through appropriate industry consultation.

The successful implementation of the regulation framework, and the overall reform of the greyhound racing industry is dependent on the active engagement of our participants in the change process. Therefore, it is essential we structure changes within a timeframe that will enable our participants to be fully engaged in the journey.

As a consequence of the above, and current industry concerns with the draft Regulations, the NSW GBOTA strongly recommends the current regulation be extended for a period of twelve months, following which implementation of the new regulation be undertaken.
Option 1 – Make the proposed regulation

Option 1 is not the preferred option of the NSW GBOTA at this stage, due to the reasons already outlined. Notwithstanding the stated position, the NSW GBOTA has outlined its concerns with the proposed regulations within the below table to aid in the development of a future draft.

The NSW GBOTA understands that a range of participants have already made submissions that echo the below points. As the recognised NSW greyhound industry advocacy entity, the NSW GBOTA’s position seeks to be reflective of the industry and its members; which includes consultation with our stakeholders.

This submission seeks to demonstrate progressive and industry protective thinking of the NSW GBOTA, which recognises sensible regulation as a cornerstone to reaching a viable NSW greyhound industry.
### NSW GBOTA Submission to Greyhound Racing Regulation 2019

<table>
<thead>
<tr>
<th>Section</th>
<th>Regulation making power under the Act</th>
<th>Clause</th>
<th>Scope of the proposed regulation</th>
<th>NSW GBOTA Response</th>
</tr>
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<tbody>
<tr>
<td>Part 1 Preliminary</td>
<td></td>
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<tr>
<td>3(1)</td>
<td>Definition of <em>greyhound racing industry participant:</em> (e) a person who provides such health services to greyhounds as are prescribed by the regulations. (f) any other person who is of a class of persons associated with greyhound racing that is prescribed by the regulations for the purposes of the definition.</td>
<td>11(1)</td>
<td>Expands the definition of greyhound racing industry participant to include persons who are not veterinarians but provide health services to a greyhound.</td>
<td>The NSW GBOTA is strongly concerned with over regulation of registrations.</td>
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<td></td>
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<td>11(3)</td>
<td>Expands the definition of greyhound racing industry participant to include:</td>
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<td></td>
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<td>• persons who handle a greyhound</td>
<td>• The NSW GBOTA supports the registration of officials operating at race meetings, however raises concerns regarding the burden of costs. Staff and volunteers who are required to be registered due to the nature of their employment should not have to bear the burden of costs. At the current time Club funding and prizemoney returns are also not sufficient to sustain increased costs of compliance.</td>
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<td>• persons who artificially inseminate greyhounds</td>
<td>• Extending the licencing framework can be beneficial. Industry concerns relate to the implementation of such licencing, costs associated to meet licencing and policing the implementation. The NSW GBOTA believes the draft plans of the licencing framework,</td>
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<td>behalf of two or more other persons who, jointly, own the greyhound</td>
<td>education and Code of Practice are first required, before progression of Regulations. Through this work the NSW GBOTA believes industry stakeholders would be able to understand recognition of other formal qualifications as part of obtaining a licence. This might include members of Chiropractic or Physiotherapy profession, which have undertaken further study of animal physiology.</td>
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<td>• The NSW GBOTA believes strongly that an owner, particularly those within syndications, should be exempt from formal police checks. The NSW GBOTA worked with former industry regulators to have this condition removed to open the gateways to greyhound ownership.</td>
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<td></td>
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<td>The NSW GBOTA supports the need for fit and proper tests for Syndicate Managers and persons which are to take care and control of a greyhound. Given a fit and proper test does not apply to ownership within other racing codes or</td>
</tr>
<tr>
<td>Regulation making power under the Act</td>
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<td>Scope of the proposed regulation</td>
<td>NSW GBOTA Response</td>
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<td>for persons owning greyhounds after their racing careers, the NSW GBOTA does not believe the imposition should apply on all owners.</td>
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<td>Given current industry demographics, it is important to make the industry accessible for overall feasibility.</td>
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<td>Subclause 2(b) appears to imply that all sorts of health services could be provided by the owner. The wording probably needs to change so that it reflects the management of the health and well-being of the greyhound directly or under the direction of a health services provider. Furthermore it is often a trainer, whelper or rarer that will manage the health and well-being not just the owner.</td>
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<td>Subclause 3(d) is incomplete and should include swabbing and have an all-inclusive reference such as other official duties as identified by the Commission.</td>
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<td>Subclause 3(e) may be problematic in that an entity may offer an interest in a greyhound where syndication is proposed. Entities invovler have been previously</td>
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<td>been referred to as a promoter. Suggest subclause 3(e) be amended to allow promotion for syndication.</td>
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<tr>
<td>Part 2 Greyhound Welfare and Integrity Commission</td>
<td>10(c) Provides for the Commission to delegate functions to any person or body prescribed in the regulations.</td>
<td>4</td>
<td>Delegates the functions of the Commission to a committee established under section 13 of the Act.</td>
<td>Supported.</td>
</tr>
</tbody>
</table>
| 15(b)   | Provides that the annual report of the Commission must include a report on the implementation of the Commission’s strategic plan and other matters required by the regulations. | 5 | Expands annual reporting requirements for the Commission. | To enhance industry transparency, the NSW GBOTA would support further reporting requirements in line with NSW Government sector. This may include:  
  - Human Resource levels and banding  
  - Complaints made against the organisation to external parties  
  - Total fees received |
### Part 3 Greyhound Racing New South Wales

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
<th>Notes</th>
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</table>
| 28(3)  | Prescribes the annual reporting requirements of GRNSW to include such other particulars contained in regulations. | 6 Expands annual reporting requirements for GRNSW. | To enhance industry transparency, the NSW GBOTA would support further reporting requirements in line with NSW Government sector. This may include:  
- Human Resource levels and banding, including external contractors  
- Complaints made against the organisation to external parties  
- Clear separation of industry expenditure, including prizemoney, Club costs and infrastructure development |

### Part 5 Control and regulation of greyhound racing industry

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
<th>Notes</th>
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<tr>
<td>48(1)</td>
<td>Prescribes the Commission authority to register greyhounds in accordance with the regulations.</td>
<td>7 &amp; 8 Proposes the Commission’s registration process for a greyhound.</td>
</tr>
<tr>
<td>Section</td>
<td>Description</td>
<td>Proposed Change</td>
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<tr>
<td>49(1)</td>
<td>Prescribes the Commission authority to register industry participants in accordance with the regulations.</td>
<td>12 &amp; 13 Proposes the Commission’s registration process for industry participants.</td>
</tr>
<tr>
<td>50(1)</td>
<td>Prescribes the Commission authority to register trial tracks in accordance with the regulations.</td>
<td>16 &amp; 17 Proposes the Commission’s registration process for trial tracks.</td>
</tr>
<tr>
<td>53(1)</td>
<td>Prescribes GRNSW authority to register racing clubs in accordance with the regulations.</td>
<td>21 &amp; 22 Proposes GRNSW’s registration process for racing clubs.</td>
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<td>Part 9 Miscellaneous</td>
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| **92**  
Provides the Minister power to delegate functions to a person or body defined in the regulations. |
| **24**  
Proposes for the Minister’s delegation to apply to the Executive Director, Liquor, Gaming and Racing, Department of Customer Service. |

Supported.

| **96**  
Enables offences under the proposed Act or the regulations to be dealt with by way of penalty notices. |
| **Schedule 1**  
Proposes each offence for which a penalty notice may be issued and the amount payable under any such penalty notice. |

Schedule 1 - Penalties
Section 39 – Contravene provision of Code of Practice known as “offence provision”.

Given that the new Code of Practice has yet to be released for public consultation, the NSW GBOTA is unable to make comment on the reasonableness or otherwise of the penalty suggested.

This further enforces the NSW GBOTA’s overall view that the status quo should remain, and the 2018 regulation be extended for twelve months.
<table>
<thead>
<tr>
<th>Section</th>
<th>Suggestion</th>
<th>Supported</th>
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<tbody>
<tr>
<td>100</td>
<td>Provides the Chief Commissioner or chief executive officer of the Commission to certify evidence for relevant matters as prescribed by the regulations.</td>
<td>25</td>
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<tr>
<td>101(2)(a)</td>
<td>Provides for the making of applications for the registration of greyhounds, industry participants, racing clubs and trial tracks (including application fees) to be prescribed by regulation.</td>
<td>7, 12, 16 &amp; 21</td>
</tr>
<tr>
<td>101(2)(b)</td>
<td>Provides for the making of regulations for any matter relating to the registration of greyhounds, industry participants, racing clubs and trial tracks.</td>
<td>8, 13, 17 &amp; 22</td>
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<td>15(1)</td>
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<tr>
<td>18(1)</td>
<td>and proprietors of trial tracks must provide certain information and details to the Commission for the purposes of registration.</td>
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<tr>
<td>101(2)(c)</td>
<td>Provides for the making of regulations in respect of the identification of greyhounds.</td>
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<tr>
<td>9(a)</td>
<td>Proposes specific conditions for the identification of a greyhound to apply to the registration of a greyhound.</td>
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<tr>
<td>19</td>
<td>Proposes to require the Commission to keep registers of registered greyhounds, industry participants and trial tracks.</td>
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</table>

There are welfare issues associated with ear tattooing and while this is currently done it may change in the future for welfare reasons. Consequently, the possible use of other methods should be covered. The ear brand requirement exists in the Rules 111 and 111A of the Commission.

Suggest subclause (b) be amended to read as follows:

“(b) an additional method of uniquely identifying the greyhound approved by the Commission.”

This way all that is required to vary it will be the Commission varying the rules.

19(2) The NSW GBOTA is deeply concerned with the level of detail that is to be kept in registers, given the sharing of information available under Clause 20.

The NSW GBOTA recommends that the data kept within registers should be limited.

Subclause 19(1) does not cover all register needs. There is a need to add to such register a register of breeding and whelping events and a register of retired
<table>
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<tr>
<th>101(2)(e)</th>
<th>Provides for the making of regulations to specify the bodies the Commission is allowed to share information containing within a register.</th>
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<tbody>
<tr>
<td>20</td>
<td>Proposes for the Commission to share information from registers with specified bodies, including animal welfare groups, GRNSW, local councils, law enforcement and government agencies.</td>
</tr>
</tbody>
</table>

The NSW GBOTA is strongly concerned with the operation of this clause, and the potential for the privacy of participants to be breached through the sharing of information available on the registers.

Whilst the NSW GBOTA appreciates that information sharing needs to occur in relation to the investigation and prosecution of animal welfare related matters, or to assist in rehoming efforts, the need to protect the privacy of participants is paramount.

In particular, the NSW GBOTA is concerned with the role of the RSPCA and Animal Welfare League, given their conflicted role as both inspectorate within the industry as well as vocal animal welfare lobbying group.

The NSW GBOTA needs to be assured that the privacy of participants is maintained and information shared from the Commission is used strictly for specific purpose.

The NSW GBOTA recommends:

- That the Commission limits the detail being contained within registers which will be available for data sharing;
- The NSW GBOTA does not see the need for open sharing of any information with the bodies listed 20(1)(g) through to (j) as these are not relevant to the functions of the Commission or in line with the recommendations of the reform panel;

- That the sharing of information to the bodies listed is limited to only detail confirming that the participant is a registered participant, greyhound or trial track;

- Further, details of participants who are no longer registered participants, should not be recorded on the register, or information available to be shared with other parties.

- That the Commission has in place a strong privacy policy that outlines to participants how their data is collected, held, and what the remedies are in case of a breach.

| 101(2)(i) | Prescribes the making of regulations to specify conditions to which the | 14 | Proposes specific conditions on registration of an industry participant is to comply with the code of practice, | 14(c) The NSW GBOTA is concerned with the making of policies without an extensive and thorough consultation process and implementation framework. |
| 101(2)(j) | Provides for the notification requirements for registered greyhounds to be specified by the regulations. |
| 101(5) | Enables the regulations to |
| 10(1) | Proposes several notification requirements for industry participants to include where there is a change of ownership, a change in premises of a greyhound, the death of a greyhound and where the greyhound ceases to be a greyhound for which the Act applies. |
| 10(3) | Proposes offences relating to |

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A good example of this is the Raceday Hydration Policy, which was introduced to participants in 2017, without adequate consultation, and is now a policy which participants must adhere to.

The NSW GBOTA and participants need to be assured that policies drafted by the Commission will go through the NSW Government policy development framework, including adequate consultation and evidence which allows for comprehensive participant feedback prior to implementation.

10(3)(a) The NSW GBOTA recommends the timeframe for change in ownership be extended to 5-10 days to provide for participants to have undertaken transport of the greyhound and confirmed the greyhound has safely arrived.

10(3)(b) The NSW GBOTA recommends the timeframe for a change in the premises extended to 5-10 days to provide for participants to have undertaken transport of the greyhound and confirmed the greyhound has safely arrived.
<table>
<thead>
<tr>
<th>15(3)</th>
<th>Industry participant’s failure comply with relevant notification requirements.</th>
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<tr>
<td>18(3)</td>
<td>Proposes an offence for a person to enter a participant only area at a licenced racecourse or greyhound trial track unless they are a registered industry participant.</td>
</tr>
<tr>
<td>23</td>
<td>Days to enable participant to transport the greyhound.</td>
</tr>
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Subclause 23(1) is far too restrictive as it restricts access to restricted areas to registered greyhound racing industry participants only. That does not provide a mechanism for other persons that may be legitimately authorised to be there.

There are several Commission and GRNSW staff who may have legitimate reasons for being in restricted areas.

In addition, veterinary surgeons are not greyhound racing industry participants but are needed. From a Club level, at times it is necessary for special guests to enter the track, which would be considered a participant only area, for example, sponsors of greyhound races, special guests invited to undertake presentations, performers, educators, media, maintenance etc.

Taken literally, the clause even precludes stewards and even the Commission’s Commissioners entering a participant only area as they are not greyhound racing industry participants.

The clause needs to be amended to allow certain persons including specified Commission, GRNSW, Club
<table>
<thead>
<tr>
<th>Schedule 4, Part 1, Clause 1</th>
<th>The regulations may contain provisions of a savings or transitional nature consequent on the enactment of this Act or any Act that amends this Act.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Schedule 2</td>
<td>Proposes savings and transitional provisions apply to all forms of registration, renewal of registration and conditions.</td>
</tr>
<tr>
<td>Schedule 3</td>
<td>The regulation extends the transition period in clause 8 of Schedule 4 to 1 July 2020. This provides the Commission opportunity to remake the Rules.</td>
</tr>
<tr>
<td></td>
<td>Extension of 2018 regulation has been proposed by the NSW GBOTA. Further work on the licencing framework is required before understanding a future position.</td>
</tr>
</tbody>
</table>

management and other persons who have reason to access participant only areas to be authorised to do so. The NSW GBOTA recommends that an extension of this clause is necessary to provide the Chief Steward, and the registered club with capacity to authorise entry to participant only areas on a case by case basis, with appropriate identification required.
Your details
First name: [redacted]
Last name: [redacted]
Organisation: [redacted]
Postal address: [redacted]
Suburb: [redacted]
State: [redacted]
Postcode: [redacted]
Email: [redacted]
Contact phone number: [redacted]

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
Absolutely essential in the tracking and identification of what dogs are been disposed of for no fault of there own.
Registration of greyhounds, industry participants, trial tracks:
Clearly theses so called policies aren’t even taken into consideration, the industry should be fined every time they fail to do the wrong thing.
Registration of greyhound racing clubs:
Absolutely essential
Penalties:
Increase the cost of the fines .
Other issues:
Maybe NSW government should donate a percentage of profit to help organisations like FOTH, pick up there wrong doings in such a cruel and corrupt Industry. We volunteer based whilst the government makes billions of dollars and doesn’t help the common good of the animals.

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name
Acknowledgement: I agree to the above statement.
Online submission: Colin Cortie on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 8:57 AM
To: @racing.nsw.gov.au

Your details
First name: Colin
Last name: Cortie
Organisation: None
Postal address: 
Suburb:
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
This submission is based on the Greens submission regarding this regulation. As the owner of an ex-racing greyhound I strongly support the Green's position. The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

Registration of greyhounds, industry participants, trial tracks:
Provisions relate to applications, conditions of registration and requirements to provide information to the Commission. Division 4 of Part 3 relates to the registers which will be kept by the Commission and the Commission's ability to share information with specified agencies. The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government's promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as 'adopted' to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
Nil comment.

Penalties:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution. The penalties currently used clearly do not prevent re-offending or discourage rule breaking. In addition, they seem lower than the penalties that would be applied if these dogs were treated as pets in a normal house hold.
The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other crim...
Publication of your details:

Publish my full submission including my name

Acknowledgement: I agree to the above statement.
Online submission: on the proposed Greyhound Racing Regulation 2019

The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent.

We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution. I am going to include here part 5 ‘Other Issues’ as the field is too small to see what is written. 5. Other issues included in the proposed regulation include the miscellaneous provisions of Part 4, related to delegation, certificate evidence, information exchange and the repeal and saving of previous instruments. The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other criminal acts to be identified and prosecuted and to save the lives of animals who are at risk. The Regulation fails to clearly establish a puppy bond, as was promised by the NSW Government. The Regulation should include the clear provision for introduction of a Puppy Bond. In conclusion, the Greyhound Racing industry has proven time and time again that it is unable to reform and whilst this regulation is a tiny step forward, it will not prevent the deaths and suffering of thousands of dogs. The only solution is to ban greyhound racing in NSW.
Other issues:

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name
Acknowledgement: I agree to the above statement.
Your details
First name: 
Last name: 
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The only thing gwic has done is over regulated a once truely great sport. Gwic was simply put there to close the industry down everyone can see it. More rule an more governances is not what’s required... Supporting the non professional trainers and the smaller country clubs needs too be looked at

Registration of greyhounds, industry participants, trial tracks:
Agreed all participants need to be licensed but the registration process needs to be looked at.... neither racing nsw of harness racing nsw required police certificate to become an owner

Registration of greyhound racing clubs:
Registration period off three years I believe is great way off ciuting administrative cost

Penalties:
No issues what new penalty system

Other issues:
Please listen to the industry participants after it’s them that providing the entertainment and tab turnover

Privacy & confidentiality
Publication of your details:
Publish my submission but do not publish my name

Acknowledgement:
I agree to the above statement.
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent.

We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed 'unsuitable to be rehomed'. As a minimum, GWIC must be required to report the number of dogs that fail the industry 'Greyhounds as Pets' program, and track what happens to the greyhounds.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others how have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government's promise of lifetime tracking of greyhounds. The ability doe owners and trainers to register their dogs as 'adopted' to themselves or a close associate takes advantage of a loophole where GWIC no longer monitor the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry on longer wants them.

The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

More information needs to be shared between racing bodies, law enforcement, Government agencies to stop animal cruelty, live baiting or other criminal acts. Offenders to be prosecuted.

NSW Government /Regulation to establish a puppy body as was promised. BAN greyhound racing in NSW
Online submission: [redacted] on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 5:12 PM
To: [redacted] @racing.nsw.gov.au

Your details
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Last name: [redacted]
Organisation: [redacted]
Postal address: [redacted]
Suburb: [redacted]
State: [redacted]
Postcode: [redacted]
Email: [redacted]
Contact phone number: [redacted]

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW): Transparency is critical. The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

Registration of greyhounds, industry participants, trial tracks: Hold people accountable. The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs: Whatever form of governance exists, it must be accountable and effective.

Penalties: The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution. If penalties are not adequate, behaviour does not change.

Other issues: The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other crime

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name
Acknowledgement: I agree to the above statement.
NSW Department of Industry Mail - Online submission: [redacted] on the proposed Greyhound Racing Regulation 2019
Online submission: on the proposed Greyhound Racing Regulation 2019
1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 5:58 PM
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Your details
First name:
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Postal address:
Suburb:
State:
Postcode:
Email:
Contact phone number:

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
Registration of greyhounds, industry participants, trial tracks:
Registration of greyhound racing clubs:
Penalties:
Other issues:
Privacy & confidentiality
Publication of your details:
Acknowledgement:

There needs to be publicly available record keeping of the number of greyhounds bred and killed each year including bonds for puppies and birth to death accountability by the racing industry.

Transparency for the general public of the number of greyhounds killed, euthanased and bred each year. Each greyhound needs to be tracked by the integrity commission.

Clubs should be held accountable for overbreeding and deaths. GWIC should impose stricter regulation and accountability on clubs including no second chances and large fines.

No second chances for any misdemeanor or animal abuse. Large fines or jail terms for animal abuse. Stricter regulation on drug use and seizing of dogs if participants are abusing their dog. Also promoting a no abuse culture with other participants by education programs for industry users and gamblers on animal abuse and reporting abuse.

Puppy bonds need to be enforced strictly and managed by GWIC. No second chances on abuse and publicity and education campaigns on what animal abuse looks like. Greyhound racing does not deserve any second chances. No preconditions on rehoming. All greyhounds deserve to be pets.

Publish my submission but do not publish my name
I agree to the above statement.
Your details
First name: Laura
Last name: Bowden
Organisation: 
Postal address: 
Suburb: 
State: 
Postcode: 
Email: 
Contact phone number: 

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW): The annual reporting system requires full transparency and should include the number of greyhounds euthanised and full reasons for their death, the number of greyhounds exported overseas and the names of the countries, retired greyhounds where and whom, eg other agency, individuals. How many were euthanised through Greyhounds as Pets, how many greyhounds tested and failed. Full statistics required. Positive drug tests to be published - name of trainer and penalties imposed.

Registration of greyhounds, industry participants, trial tracks: Support expansion of the powers and funding of GWIC not from the taxpayer’s pockets but from the greyhound industry. I strongly object to my hard earned taxes supporting a cruel and dying industry. Broaden the definition of participant to include the terms specified in the Green’s submission. Anything short of that is not offering these lovely animals the protection they deserve.

Registration of greyhound racing clubs: I don’t have sufficient information to answer this and how this would benefit the welfare of greyhounds.

Penalties: The penalties are insufficient to act as a deterrent - they should be increased significantly. I support robust information sharing between the various agencies involved and the whole of life tracking system for the protection of greyhounds. What I support the most is the banning of the greyhound industry, close it down, save these animals, save on human suffering with gambling addictions.

Other issues:
Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.
Online submission: laurence hickey on the proposed Greyhound Racing Regulation 2019

3 messages

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 6:46 PM

To: @racing.nsw.gov.au

Your details
First name: laurence
Last name: hickey
Organisation:
Postal address: 
Suburb: 
State: 
Postcode: 
Email:
Contact phone number:

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):

Why aren't all registered greyhounds, or in a litter at birth, then tracked in their lifecycle. By not ensuring this is enforced it allows the unscrupulous owners and trainers to adopt out animals to friends, relatives and other parties - who then can dispose of the animal without any concerns of a regulatory body checking up on the animals well-being. By not being required to publish the numbers of greyhound deaths, flies in the face of the reforms created after the exposing of the use of live-baiting, illegal drug use and the killing of thousands upon thousands of perfectly healthy dogs.

Registration of greyhounds, industry participants, trial tracks:

Anyone connected with the industry needs to be subject to scrutiny and be required to follow regulations in regards to the well-being and health of all greyhounds. This needs to be installed and enforced by independent domains so as not to create a conflict of interest.

Registration of greyhound racing clubs:

All greyhound racing tracks, or training tracks need to be registered and monitored by the Greyhound Welfare Integrity Commission.

Penalties:

Just as the life bans were repealed in many cases, and other lengthy bans were greatly reduced; so, now we want to see a reduction in the fining and banning of unscrupulous operators in the industry. Once, it's off the front page and the public has forgotten about the terrible injustices inflicted upon the animal; then the industry get back to their dirty and insidious practice. Anyone caught should be banned and their dogs seized, not merely transferred over to their partner or relative.

Other issues:
Privacy & confidentiality
Publication of your details: Publish my full submission including my name
Acknowledgement: I agree to the above statement.

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[Quoted text hidden]

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 6:47 PM
To: @racing.nsw.gov.au
[Quoted text hidden]
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):

Your feedback

Annual reporting requirements of Greyhound Racing NSW and Greyhound Welfare Integrity Commission are not sufficient. The proposed annual reporting requirements of the Greyhound Racing Welfare Integrity Commission are completely inadequate. The requirements appear to be designed to hide negative animal welfare outcomes of greyhound racing. For example, the only way for the public to know how many dogs are killed each year is to submit costly Government Information (Public Access) Act 2009 (GIPA) applications. This complete lack of transparency, especially for an industry that is regulated by law and receives a significant amount of public money, is unacceptable. At a minimum, GWIC should be required to publish full statistics on the following in its annual report: ● Greyhounds Euthanised: ○ Euthanised due to injury ○ Euthanised due to illness ○ Euthanised due to age ○ Euthanised by a registered vet on-track from an injury ○ Euthanised due to being deemed 'Not Suitable for Re-homing' ○ Euthanised due to Unsuccessful Re-homing ○ Greyhounds Registered as leaving the industry ○ Greyhounds retired as a pet to self (participant) ○ Greyhounds retired by the participant to a private person (non-participant) ○ As a pet through Greyhounds as Pets ○ Greyhounds Exported, including destination countries. ○ Surrendered to another agency, such as RSPCA NSW or a Council facility (including details of participants charged by GWIC as a result of abandoning the animal and whether or not that animal is euthanized at that facility). ○ Deceased from track injuries (reported by GWIC as ‘sudden deaths’) ● The details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed. GWIC should also publish any transfers of greyhounds that happen after an individual is charged with a drug offence. Greyhound Racing NSW should be required to publish how many greyhounds were tested by Greyhounds as Pets, the failure rate, how many dogs are euthanised in the care of Greyhounds as Pets and how many dogs that have failed Greyhounds as Pets are subsequently put down. I support the expansion of GWIC's powers to monitor, investigate and regulate people in these classes of participant, as greyhounds in their care are at risk of mistreatment and cruelty, especially due to the widespread industry use of ‘muscle men’ in place of qualified veterinarians. The Special Commission of Inquiry into the Greyhound Racing Industry in NSW found that “muscle men often use, for treating greyhounds, drugs that are unregistered and unlabelled, and not intended for use for greyhounds” and “that the widespread treatment of greyhounds by muscle men, engaged by industry participants, places many greyhounds at significant risk of harm” 4 GWIC needs to be vigilant to ensure that any person who provides health services to greyhounds is qualified to do so, and are not engaging in painful procedures such as blistering, sclerosing, pin firing and needling. To date, GWIC has not been effective in monitoring greyhound racing participants. For example, the recent case of Charles Sultana, who was found guilty of seven counts of being in charge of an animal and failing to provide vet treatment, was identified by the RSPCA, not by GWIC. GWIC needs additional budget, drawn from Greyhound Racing NSW and not from the taxpayer, to effectively utilise these new powers.
The proposed Penalty Infringement Notice (PIN) penalties are not strong enough. The regulation proposes to introduce Penalty Infringement Notices as an alternative or in addition to prosecution for offences under the Greyhound Racing Act 2017. Such offences include contravening the code of practice, registration offences and the keeping of any animal that is reasonably capable of being used as a lure in connection with the trialling, training or racing of greyhounds. While I understand prosecutions are sometimes lengthy and difficult and that Penalty Notices can be issued more quickly, they should be used in addition to prosecutions, not in their place. In addition, the proposed penalties in the regulation are too small to be a significant deterrent and should be increased by a factor of at least five times.

Other issues:

Proposed Register of Greyhounds is insufficient and fails to establish lifecycle tracking.

Privacy & confidentiality

Publication of your details: Publish my full submission including my name

Acknowledgement: I agree to the above statement.

Annual reporting requirements of Greyhound Racing NSW and Greyhound Welfare Integrity Commission are not sufficient. The proposed annual reporting requirements of the Greyhound Racing Welfare Integrity Commission are completely inadequate. The requirements appear to be designed to hide negative animal welfare outcomes of greyhound racing. For example, the only way for the public to know how many dogs are killed each year is to submit costly Government Information (Public Access) Act 2009 (GIPA) applications. This complete lack of transparency, especially for an industry that is regulated by law and receives a significant amount of public money, is unacceptable. At a minimum, GWIC should be required to publish full statistics on the following in its annual report:

- Greyhounds Euthanised:
  - Euthanised due to injury
  - Euthanised due to illness
  - Euthanised due to age
  - Euthanised by a registered vet on-track from an injury
  - Euthanised due to being deemed ‘Not Suitable for Re-homing’
  - Euthanised due to Unsuccessful Re-homing
- Greyhounds Registered as leaving the industry
- Greyhounds retired as a pet to self (participant)
- Greyhounds retired by the participant to a private person (non-participant)
- Greyhounds as Pets
- Greyhounds Exported, including destination countries
- Deceased from track injuries (reported by GWIC as ‘sudden deaths’)
- The details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed.
- GWIC should also publish any transfers of greyhounds that happen after an individual is charged with a drug offence.
- Greyhound Racing NSW should be required to publish how many greyhounds were tested by Greyhounds as Pets, the failure rate, how many dogs are euthanised in the care of Greyhounds as Pets and how many dogs that have failed Greyhounds as Pets are subsequently put down.

Registration of greyhounds, industry participants, trial tracks:

I support the expansion of GWIC’s powers to monitor, investigate and regulate people in these classes of participant, as greyhounds in their care are at risk of mistreatment and cruelty, especially due to the widespread industry use of ‘muscle men’ in place of qualified veterinarians. The Special Commission of Inquiry into the Greyhound Racing Industry in NSW found that “muscle men often use, for treating greyhounds, drugs that are unregistered and unlabelled, and not intended for use for greyhounds” and “that the widespread treatment of greyhounds by muscle men, engaged by industry participants, places many greyhounds at significant risk of harm” 4 GWIC needs to be vigilant to ensure that any person who provides health services to
greyhounds is qualified to do so, and are not engaging in painful procedures such as blistering, sclerosing, pin firing and needling. To date, GWIC has not been effective in monitoring greyhound racing participants. For example, the recent case of Charles Sultana, who was found guilty of seven counts of being in charge of an animal and failing to provide vet treatment, was identified by the RSPCA, not by GWIC. GWIC needs additional budget, drawn from Greyhound Racing NSW and not from the taxpayer, to effectively utilise these new powers.

Registration of greyhound racing clubs:

The proposed Penalty Infringement Notice (PIN) penalties are not strong enough. The regulation proposes to introduce Penalty Infringement Notices as an alternative or in addition to prosecution for offences under the Greyhound Racing Act 2017. Such offences include contravening the code of practice, registration offences and the keeping of any animal that is reasonably capable of being used as a lure in connection with the trialling, training or racing of greyhounds. While I understand prosecutions are sometimes lengthy and difficult and that Penalty Notices can be issued more quickly, they should be used in addition to prosecutions, not in their place. In addition, the proposed penalties in the regulation are too small to be a significant deterrent and should be increased by a factor of at least five times.

Other issues: Proposed Register of Greyhounds is insufficient and fails to establish lifecycle tracking.

Privacy & confidentiality

Publication of your details: Publish my full submission including my name

Acknowledgement: I agree to the above statement.
Online submission: **[submit](mailto:digital.publishing@industry.nsw.gov.au)** on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 8:54 PM

To: [submit]@racing.nsw.gov.au

Your details

First name: [redacted]
Last name: [redacted]
Organisation: [redacted]
Postal address: [redacted]
Suburb: [redacted]
State: [redacted]
Postcode: [redacted]
Email: [redacted]
Contact phone number: [redacted]

Your feedback

The proposed annual reporting requirements of the Greyhound Racing Welfare Integrity Commission are completely inadequate. The requirements appear to be designed to hide negative animal welfare outcomes of greyhound racing. For example, the only way for the public to know how many dogs are killed each year is to submit costly Government Information (Public Access) Act 2009 (GIPA) applications. This complete lack of transparency, especially for an industry that is regulated by law and receives a significant amount of public money, is unacceptable. At a minimum, GWIC should be required to publish full statistics on the following in its annual report:

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  - Euthanised by a registered vet on-track from an injury
  - Euthanised due to being deemed ‘Not Suitable for Re-homing’
  - Euthanised due to Unsuccessful Re-homing
- **Greyhounds Registered as leaving the industry**
- **Greyhounds retired as a pet to self (participant)**
- **Greyhounds retired by the participant to a private person (non-participant)**
- **As a pet through Greyhounds as Pets**
- **Greyhounds Exported, including destination countries**
- **Surrendered to another agency, such as RSPCA NSW or a Council facility (including details of participants charged by GWIC as a result of abandoning the animal and whether or not that animal is euthanized at that facility)**
- **Deceased from track injuries (reported by GWIC as ‘sudden deaths’)**

The details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed. GWIC should also publish any transfers of greyhounds that happen after an individual is charged with a drug offence. Greyhound Racing NSW should be required to publish how many greyhounds were tested by Greyhounds as Pets, the failure rate, how many dogs are euthanised in the care of Greyhounds as Pets and how many dogs that have failed Greyhounds as Pets are subsequently put down.

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):

The proposed annual reporting requirements of the Greyhound Racing Welfare Integrity Commission are completely inadequate. The requirements appear to be designed to hide negative animal welfare outcomes of greyhound racing. For example, the only way for the public to know how many dogs are killed each year is to submit costly Government Information (Public Access) Act 2009 (GIPA) applications. This complete lack of transparency, especially for an industry that is regulated by law and receives a significant amount of public money, is unacceptable. At a minimum, GWIC should be required to publish full statistics on the following in its annual report:

- **Greyhounds Euthanised:**
  - Euthanised due to injury
  - Euthanised due to illness
  - Euthanised due to age
  - Euthanised by a registered vet on-track from an injury
  - Euthanised due to being deemed ‘Not Suitable for Re-homing’
  - Euthanised due to Unsuccessful Re-homing
- **Greyhounds Registered as leaving the industry**
- **Greyhounds retired as a pet to self (participant)**
- **Greyhounds retired by the participant to a private person (non-participant)**
- **As a pet through Greyhounds as Pets**
- **Greyhounds Exported, including destination countries**
- **Surrendered to another agency, such as RSPCA NSW or a Council facility (including details of participants charged by GWIC as a result of abandoning the animal and whether or not that animal is euthanized at that facility)**
- **Deceased from track injuries (reported by GWIC as ‘sudden deaths’)**

The details of all positive drug tests, including the name of the greyhound, owner and trainer and the penalty imposed. GWIC should also publish any transfers of greyhounds that happen after an individual is charged with a drug offence. Greyhound Racing NSW should be required to publish how many greyhounds were tested by Greyhounds as Pets, the failure rate, how many dogs are euthanised in the care of Greyhounds as Pets and how many dogs that have failed Greyhounds as Pets are subsequently put down.

Registration of greyhounds, industry participants, trial tracks:

The Regulations propose to expand the definition of a greyhound racing industry participant to a wider range of people, including: people who provide health services to greyhounds, people who handle greyhounds, people who artificially inseminate greyhounds, proprietors of trial tracks, officials at trial and race tracks, persons who offer applications for financial interests in greyhounds and people who manage ownership of greyhounds. We support the expansion of GWIC’s powers to monitor, investigate and regulate people in these classes of participant, as greyhounds in their care are at risk of mistreatment and cruelty, especially due to the widespread industry use of ‘muscle men’ in place of qualified veterinarians.

The Special Commission of Inquiry into the Greyhound Racing Industry in NSW found that “muscle men” are being used, for treating greyhounds, drugs that are unregistered and unlabelled, and not intended for use for greyhounds and that the widespread treatment of greyhounds by muscle men, engaged by industry participants, places many greyhounds at significant risk of harm. GWIC needs to be vigilant to ensure that any person who provides health services to greyhounds is qualified to do so, and are not engaging in painful procedures such as blistering, sclerosing, pin firing and needling. To date, GWIC has not been effective in monitoring greyhound racing participants. For example, the recent case of Charles Sultana, who was found guilty of seven counts of being in charge of an animal and failing to provide vettreatment, was identified by the RSPCA, not by...
GWIC. GWIC needs additional budget, drawn from Greyhound Racing NSW and not from the taxpayer, to effectively utilise these new powers.

2. Proposed Register of Greyhounds is insufficient and fails to establish lifecycle tracking. The Regulation proposes to require the Commission to keep registers of registered greyhounds. The regulation as written completely fails in the objective of whole of life cycle tracking and care, which is incongruent with the recommendations of the Special Commission of Inquiry into the Greyhound Racing Industry in NSW, the Greyhound Industry Reform Panel and even the industry’s proposed guarantees to reform greyhound racing. There is still no plan to track greyhounds once they have been adopted. The proposed register would allow an owner to adopt out an animal to a relative or associate, who would then be free to dispose of the animal to the local pound or have the animal euthanised, with the owner having discharged their responsibilities. This is an ongoing concern which has been a risk for some time and which has not been addressed. Page 9 of the “Chief Executive Brief PN25/106—Greyhound Euthanasia Considerations and Emergency Euthanasia Provisions” of Greyhound Racing NSW states, "There remains a risk that a greyhound owner may submit to GRNSW a Notification of Retirement form advising their greyhound has been retired as a pet to friend or family member. As the greyhound is no longer registered with GRNSW, this friend or family member could immediately take the greyhound to the local council with the intention that the greyhound be euthanized". Despite this risk being raised many times by the Greens and animal welfare groups, there is still no commitment to lifetime tracking. We believe that there should be a requirement to monitor the welfare of all greyhounds that exit the industry alive to ensure they are cared for throughout their entire life cycle.

Registration of greyhound racing clubs:

5. The proposed Penalty Infringement Notice (PIN) penalties are not strong enough. The regulation proposes to introduce Penalty Infringement Notices as an alternative or in addition to prosecution for offences under the Greyhound Racing Act 2017. Such offences include contravening the code of practice, registration offences and the keeping of any animal that is reasonably capable of being used as a lure in connection with the trialling, training or racing of greyhounds. While we understand prosecutions are sometimes lengthy and difficult and that Penalty Notices can be issued more quickly, they should be used in addition to prosecutions, not in their place. In addition, the proposed penalties in the regulation are too small to be a significant deterrent and should be increased by a factor of at least five times.

Other issues: of great concern to me in particular is the export of greyhounds to China, and I would advocate that this practice be prosecuted to the full extent of the law.

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name

Acknowledgement: I agree to the above statement.
Online submission: Trevor Hagney on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 9:36 PM
To: racing.nsw.gov.au

Your details
First name: Trevor
Last name: Hagney
Organisation:
Postal address: [Redacted]
Suburb: [Redacted]
State: [Redacted]
Postcode: [Redacted]
Email: [Redacted]
Contact phone number: [Redacted]

Your feedback

Clause 5- ANNUAL REPORTING BY THE COMMISSION. With the commission being responsible for the collection of all data pertaining to registered greyhounds, the following particulars should be included in it's annual report: -number of registered greyhounds transferred to interstate or overseas. -number of registered greyhounds transferred into NSW -number of litters whelped -total number of pups whelped -number of active broodbitches -number of active stud dogs -number of dogs retired to owners -number of dogs retired to third parties -number of dogs rehomed by GAP. These particulars would enhance transparency, give an accurate indication of dog movements and help formulate future strategic plans. Clause 6- ANNUAL REPORTING BY GRNSW. Any summary by GRNSW of adoption programs managed or supported by GRNSW should include: -number of dogs assessed -number of dogs accepted -number of dogs rejected -reasons given for rejections. These particulars would enhance transparency and give accurate information for planning further development of adoption programs.

REGISTRATION OF INDUSTRY PARTICIPANT Clause 11(1). Should include an exemption for a person who provides non invasive health services to a greyhound with permission of the owner, for no fee. The owner will accept all liability for any outcome of such service. Clause 11(3) Should include the exemption- Any person who handles a greyhound outside of a race or trial, with the permission of the owner, shall not need to be licenced as a greyhound industry participant. This would stop the need to licence family, friends, children, neighbours etc who help with day to day duties associated with the keeping of a greyhound, including grooming, bathing, exercising and feeding.

ANNUAL PAYMENT FOR THE KEEPING OF A GREYHOUND Clause 9a & 9b. The rationale behind this regulation has not been stated but can be assumed to be aimed at one of the following criteria. 1. IMPLEMENTATION OF A PUPPY BOND. This would be consistent with reform panel recommendations but may have too many negative impacts. Under NSW Productivity Commission guidelines one must assess costs versus benefits. This regulation creates more red tape, with administration costs to the commission and economic impacts to the owner. -this levy will increase the price of pups for sale -imposition of a bond will have a negative effect on breeding and industry sustainability. Current breeding numbers are already below sustainable levels, as witnessed by the inability of GRNSW to attract full fields for current race programming -recovery of the bond at retirement of a greyhound may lead to manipulation of the scheme by unlicensed parties or persons. 2. REGISTRATION FOR REVENUE PURPOSES. An annual registration fee for revenue purposes has no positive effect. As well as creating red tape it will discourage new ownership of greyhounds. Other racing codes do not charge annual registration fees and may seem more attractive to prospective owners if this regulation is enforced.

Registration of greyhound racing clubs: No comment
Penalties: No comment

Registration of greyhounds, industry participants, trial tracks:

Penalties: No comment

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
Other issues: INFORMATION SHARING - Should be limited to 1. information of ownership for lost dogs handed into a shelter. 2. information required in regard to legal or criminal proceedings.

Privacy & confidentiality
Publication of your details: Publish my full submission including my name

Acknowledgement: I agree to the above statement.
Online submission: on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 11:43 PM
To: racing.nsw.gov.au

Your details
First name:
Last name:
Organisation:
Postal address:
Suburb:
State:
Postcode:
Email:
Contact phone number:

Your feedback

Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
Part 2 of the proposed Regulation includes a number of annual reporting requirements for the Commission and GRNSW to promote increased industry transparency and accountability. The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

Divisions 1 and 2 of Part 3 relate to the registration of greyhounds, industry participants and trial tracks, which is the responsibility of the Greyhound Welfare and Integrity Commission under Greyhound Racing Act 2017 (the Act). Provisions relate to applications, conditions of registration and requirements to provide information to the Commission. Division 4 of Part 3 relates to the registers which will be kept by the Commission and the Commission's ability to share information with specified agencies. The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ’adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
No comment.

Penalties:
Penalty notice offences are set out in Schedule 1 of the proposed Regulation. Penalty notice offences form part of a suite of disciplinary options, which include disciplinary action under the NSW Rules of Racing and offences under the Act. The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

Other issues:
The proposal for information sharing between the greyhound racing bodies and animal w
Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name.
Acknowledgement: I agree to the above statement.
Online submission: [REDACTED] on the proposed Greyhound Racing Regulation 2019

1 message

digital.publishing@industry.nsw.gov.au <digital.publishing@industry.nsw.gov.au> Fri, Jul 19, 2019 at 11:49 PM
To: [REDACTED]@racing.nsw.gov.au

Your details
First name: [REDACTED]
Last name: [REDACTED]
Organisation: [REDACTED]
Postal address: [REDACTED]
Suburb: [REDACTED]
State: [REDACTED]
Postcode: [REDACTED]
Email: [REDACTED]
Contact phone number: [REDACTED]

Your feedback
Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW (GRNSW):
The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent. We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.

Registration of greyhounds, industry participants, trial tracks:
Provisions relate to applications, conditions of registration and requirements to provide information to the Commission. Division 4 of Part 3 relates to the registers which will be kept by the Commission and the Commission’s ability to share information with specified agencies. The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer. The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

Registration of greyhound racing clubs:
No comment.

Penalties:
The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

Other issues:
In conclusion, the Greyhound Racing industry has proven time and time again that it is unable to reform and whilst this regulation is a tiny step forward, it will not prevent the deaths and suffering of thousands of dogs. The only solution is to ban greyhound racing in NSW.

Privacy & confidentiality
Publication of your details: Publish my submission but do not publish my name
Acknowledgement: I agree to the above statement.
The NSW Government is clearly keen to see the continuation of the greyhound racing industry and simultaneously to introduce and enforce much higher standards of governance and animal welfare.

However, given the history of the many rogue players involved in greyhound racing in NSW, and the horrendous cruelty that was exposed, it clearly requires more detailed and rigorous oversight and a demand for greater transparency than other industries. It is reasonable to expect that some participants will continue to hide cruelty and seek to deceive the government and the public. As the breeding and training of greyhounds takes place almost completely out of view, self-regulation cannot be justified at any level. Oversight needs to be conducted by highly experienced professionals, who are 100% independent of the industry, who have substantial powers to enforce and prosecute and who will not be easily fooled or intimidated.

The proposed register of greyhounds is not enough to shine a light on cruel practices

There are two key issues that the proposed regulations are either not addressing at all or insufficiently.

The first relates to puppies. There does not appear to be anything to stop breeders killing puppies who appear to them unlikely to be lucrative. There is no register of pregnant greyhounds or of their litters. A requirement to report both should be included in the regulation and breeders should expect unannounced spot checks.

The second relates to the absurd loophole where breeders and trainers can claim a greyhound has been adopted by them or a friend or a relative at which point the greyhound is out of the system with no oversight or protection. Greyhounds should only be allowed to be adopted through proper greyhound adoption agencies and a detailed register must be maintained.

The proposed penalties are not enough

In addition to severe financial penalties, those caught inflicting cruelty should expect prosecution and jail. The base penalty for not adhering to key regulations should be removal from participating in the industry in any capacity ever again. The penalty for a greyhound being killed or severely injured during a race should be no less than the entire day’s combined prize money and the prospect of criminal charges where the cause was negligence or indifference.

The proposed small financial penalties under the infringement notices regime are not enough to be a deterrent.
GWIC must be transparent

Confidence in GWIC’s oversight of the industry is only possible if investigations, results and enforcement actions are transparent and publicly available. There needs to be greater cooperation between GWIC and other enforcement agencies, including the RSPCA and the police, with breeders and trainers having an unambiguous signal that unannounced checks will be made and the price for transgression will be high.

Puppy Bond is significantly overdue

The recommendation of a ‘Puppy Bond’ was made more than two years ago. It hasn’t happened. This proposal is supported by Greyhound Racing NSW to control breeding and to ensure the welfare of greyhounds. The bond is an important measure to reduce wastage (that term should be banned from use in the context of animals’ lives). If breeder or trainers can’t afford it, they are obviously not in a position to breed or train responsibly.

Vets must be required to keep records of all greyhounds they treat

The veterinary practices I spoke with when trying to obtain the medical history of the greyhound I adopted was extremely disappointing. They had no records, told me they see hundreds of greyhounds, don’t register names and don’t really know who owns them. That shows a frightening scale of unsupervised activity. None of the above is acceptable and vets should be made part of the frontline in enforcing proper governance of the industry.

Regards

Please publish my submission but do not publish my name
To whom it may concern

1. Support for expanding the definition of a greyhound racing industry participant.
   Approve.

2. Proposed register of greyhounds.
   Fails on lifecycle tracking; register must be made public.

3. Information sharing.
   Approve.

4. Penalty Infringement Notice (PIN) penalties.
   Too weak.

5. Puppy bond.
   Fails to establish.

Please publish my full submission including my name.

Regards,
RooiPing Lim
Dear Sir / Madam,

Racing Regulations 2019

1. Support for expanding the definition of a greyhound racing industry participant.
   Approve.

2. Proposed register of greyhounds.
   Fails on lifecycle tracking; register must be made public.

3. Information sharing.
   Approve.

4. Penalty Infringement Notice (PIN) penalties.
   Too weak. Much stronger penalties needed

5. Puppy bond.
   Fails to be established by these regulations.

I'm happy for you to publish my full submission including my name.

Kind Regards,

Matt Randall
Feedback submission Greyhound Racing Regulation 2019

1 message

vicki springett
To: racing.admin@racing.nsw.gov.au

Fri, Jul 19, 2019 at 8:08 PM

Please note my submission below.

1. Support for expanding the definition of a greyhound racing industry participant. 
   Approve.

2. Proposed register of greyhounds. 
   Fails on lifecycle tracking; register must be made public.

3. Information sharing. 
   Approve.

4. Penalty Infringement Notice (PIN) penalties. 
   Too weak.

5. Puppy bond. 
   Fails to be established by these regulations.

Publish my full submission including my name.

Regards,

Victoria Springett

---
Feedback submission - Greyhound Racing Regulation 2019

1 message

Saxon Strauss

To: "racing.admin@racing.nsw.gov.au" <racing.admin@racing.nsw.gov.au>  
Fri, Jul 19, 2019 at 9:25 PM

1. Support for expanding the definition of a greyhound racing industry participant.  
   Approve.
2. Proposed register of greyhounds.  
   Fails on lifecycle tracking; register must be made public.
3. Information sharing.  
   Approve.
4. Penalty Infringement Notice (PIN) penalties.  
   Too weak.
5. Puppy bond.  
   Fails to be established by these regulations.

- Publish my full submission including my name.
- I want my feedback submission to be treated as public

Regards, Saxon Strauss
Feedback submission - Greyhound Racing Regulation 2019

1. Support for expanding the definition of a greyhound racing industry participant.
   Approve.

2. Proposed register of greyhounds.
   Fails on lifecycle tracking; register must be made public.

3. Information sharing.
   Approve.

4. Penalty Infringement Notice (PIN) penalties.
   Too weak.

5. Puppy bond.
   Fails to be established by these regulations.

Publish my submission but do not publish my name.

Regards,
1. Support for expanding the definition of a greyhound racing industry participant.
   Approve.
2. Proposed register of greyhounds.
   Fails on lifecycle tracking; register must be made public.
3. Information sharing.
   Approve.
4. Penalty Infringement Notice (PIN) penalties.
   Too weak.
5. Puppy bond.
   Fails to be established by these regulations.

Publish my submission but do not publish my name.

Regards,
Feedback submission - Greyhound Racing Regulation 2019
1 message

Jacqui Pyke  
To: racing.admin@racing.nsw.gov.au

Fri, Jul 19, 2019 at 11:10 PM

Here is my submission

1. Support for expanding the definition of a greyhound racing industry participant.

Approve.

2. Proposed register of greyhounds.

Fails on lifecycle tracking; register must be made public.

3. Annual Reporting NOT Sufficient

Not enough information is available and at a minimum they should be tracking:

Euthanisation rates due to:

Injury
Illness
AGE

On track euthanisation

Euthanisation due to no suitable re-home

Also need to know how many are re-homed via GAP and by other organisations such as RSPCA, Council Run Pounds and charities such as Greyhound Rescue

4. Information sharing.

Approve.

5. Penalty Infringement Notice (PIN) penalties.

Too weak.

6 Puppy bond.

Fails to establish.

Publish my full submission including my name.

Regards,
Feedback submission - Greyhound Racing Regulation 2019

1 message

Fri, Jul 19, 2019 at 11:29 PM

Reply-To: [redacted]
To: racing.admin@racing.nsw.gov.au

1. Support for expanding the definition of a greyhound racing industry participant.
   Approve.

2. Proposed register of greyhounds.
   Fails on lifecycle tracking; register must be made public.

3. Information sharing.
   Approve.

4. Penalty Infringement Notice (PIN) penalties.
   Too weak.

5. Puppy bond.
   Fails to establish.

Please publish my submission but do not publish my name.
Submission on the Greyhound Racing Regulation 2019

19 July 2019

Office of Racing
GPO Box 7080
SYDNEY NSW 2001
By email: racing.admin@racing.nsw.gov.au

Contact: Jennifer Windsor
President, NSW Young Lawyers

Daniel Cung
Chair, NSW Young Lawyers Animal Law Committee

Contributors: Daniel Cung, Shar Doudman
The NSW Young Lawyers Animal Law Committee (Committee) makes the following submission in response to the draft Greyhound Racing Regulation 2019 (Regulation).

NSW Young Lawyers

NSW Young Lawyers is a division of the Law Society of New South Wales. NSW Young Lawyers supports practitioners in their professional and career development in numerous ways, including by encouraging active participation in its 16 separate committees, each dedicated to particular areas of practice. Membership is automatic for all NSW lawyers (solicitors and barristers) under 36 years and/or in their first five years of practice, as well as law students. NSW Young Lawyers currently has over 15,000 members.

The Animal Law Committee

The Committee comprises a group of over 400 members interested in animal welfare and laws regulating the treatment of animals. The Committee aims to raise awareness and provide education to the legal profession and wider community, while increasing understanding about the importance of protecting animals from abuse and neglect. A common theme amongst Committee members is a passion and desire to use their legal skills and the law to improve the welfare of animals.

Discussion

Functions and Reports of the Greyhound Welfare and Integrity Commission (the Commission) and Greyhound Racing NSW (GRNSW)

Under Part 2, the annual requirements for the Commission and GRNSW should be more extensive to ensure greater transparency and accountability within the industry. In particular, these bodies should be required to provide detailed information on the number of greyhounds euthanised within the industry, including for reasons such as injury, age, or being deemed unsuitable for re-homing. Evidence shows an alarming percentage of racing greyhounds die in NSW from injury at the track or from being euthanized – documents obtained under freedom of information laws showed this figure to be as high as 40%.

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Part 2 should also impose reporting requirements for the ‘Greyhound as Pets’ program coordinated by GRNSW, which is intended to re-home greyhounds that are retired from racing. The reporting requirements in the Regulation should require GRNSW to provide evidence of the number of greyhounds successfully re-homed through the program and information on what happens to greyhounds unable to be re-homed.

The NSW Office of Racing website states that ‘the NSW Government is committed to an ethical and sustainable greyhound racing industry based on high standards of animal welfare’. Transparency, through the reporting requirements proposed above, is essential if that object is to be achieved.

Registration of greyhounds, industry participants, trial tracks

The registration of greyhounds under Part 3 Division 1 should impose a further requirement to track each animal through their lifespan, not only until the end of the period for which a greyhound is registered. This is imperative to ensure transparency with respect to what happens to greyhounds after they are retired from racing in light of public concerns about the fate of “unwanted” retired racing greyhounds.

Under Part 3 Division 2, the proposed expansion of the definition of ‘greyhound racing industry participant’ to include a broader range of people increases the scope of who can be monitored under the Act. This is strongly supported in the interests of ensuring greater transparency and accountability within the industry. However, the industry should be called on to provide the necessary funding to the Commission to support the anticipated broadening of these monitoring powers, rather than it being funded by taxpayers.

Registration of greyhound racing clubs

No comment in relation to Part 3 Division 5.

Penalties

The penalties provided for in the draft Regulation are set at a very low level, by comparison to the penalties provided for under the Act. As one extreme example, the Act provides for fines (at current penalty unit rates) of up to $110,000 for corporations or $22,000 for individuals who commit offences under section 42(2). The proposed penalties under the Regulation are $275 for a first offence or $550 for a second or subsequent offence. That is, the penalty notice is between 0.25% and 1.25% of the statutory maximum fine. The

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proposed penalty notice amounts for other offences, even if not quite as extreme as section 42(2), are nonetheless in most cases only a few percent of the fines allowed under the Act.

While it is accepted that there are utilitarian benefits in the use of penalty notices, and that penalty notice amounts by their nature should not be expected to be anywhere close to the maximum fines permissible after a prosecution, they also must be set at amounts that will penalise wrongdoers and provide real deterrence. On that basis, the Committee recommends that the penalty notice amounts be increased (ideally, at least doubled), particularly for second and subsequent offences.

Further, while a matter going beyond the text of the Regulation itself, it is essential that penalty notices are not used to the exclusion of prosecution. That is especially so if there is to be such a large disparity between the penalty notice amounts and the penalties available upon prosecution under the Act.

Other issues

The proposal to share information between the Commission and animal protection bodies, law enforcement and other Government agencies and bodies under Part 3 Division 4 is strongly supported.

However, in the interests of furthering transparency, the Commission should be obligated to provide such information rather than the conditional wording of 'may share information', unless a compelling reason is provided for refusing the request.

A body whose request for information is refused should also be provided with a right of review – in the Committee’s view that could most easily be done by permitting appeals under the Administrative Decisions Review Act 1997 (NSW) (although it is acknowledged that would require a corresponding amendment to the authorising Act).

This is vital to ensure greyhound racing participants who engage in live baiting and other cruel and illegal practices can be identified and appropriately prosecuted.

Finally, the Regulation should include a provision for requiring a bond for each puppy bred in the industry, as recommended by the NSW Government’s Greyhound Industry Reform Panel and described as “essential” by Greyhound Racing NSW.3

Concluding Comments

NSW Young Lawyers and the Committee thank you for the opportunity to make this submission. If you have any queries or require further submissions, please contact the undersigned at your convenience.

Contact:

Jennifer Windsor
President
NSW Young Lawyers
Email: president@younglawyers.com.au

Alternate Contact:

Daniel Cung
Chair
NSW Young Lawyers Animal Law Committee
Email: alc.chair@younglawyers.com.au
Thank you for the opportunity to lodge a submission concerning the Draft Greyhound Racing Regulation 2019.

I have during previous Inquiries into Greyhound racing lodged comprehensive submissions outlining my strong opposition to the exploitation of Greyhounds for racing and gambling and the evidenced reasons why.

I continue to be very disappointed that in spite of the initial euphoria when the NSW government announced a complete ban on Greyhound racing, and in spite of the ongoing evidence of gross corruption, wrongdoing and most importantly, the ongoing suffering, cruelty and injury and death rates, it is still necessary to compile submissions on this subject.

There is no justification for the continuance of the NSW Greyhound racing industry which contributes to the suffering, cruelty, injury and death rate of thousands of dogs in addition to the known associated serious societal issues including drugs and gambling.

By their own statistics, the Greyhound Welfare and Integrity Commission (GWIC), confirm that 40% of Greyhounds leave the industry dead. This is totally unacceptable as is the ongoing use of public money to prop up what is an unsustainable venture. The NSW government's ongoing support of this industry is a support for legalised animal abuse and cruelty.

1. Functions and reports of the Greyhound Welfare and Integrity Commission and Greyhound Racing NSW

Part 2 of the proposed Regulation includes a number of annual reporting requirements for the Commission and GRNSW to promote increased industry transparency and accountability.

The Annual Reporting requirements for both the Greyhound Welfare Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) on animal welfare and integrity matters are unacceptable and are designed to prevent the public knowing how many dogs are killed by this industry. Both of these bodies are established in law and given the amount of public money the NSW Government gives to the industry, they should be required to be much more transparent.

We know hundreds of dogs are killed each year after suffering treatable injuries or being deemed as ‘unsuitable to be rehomed’. As a minimum, GWIC must be required to report the number of greyhounds killed each year and for what reason and GRNSW should report the number of dogs that fail the industry ‘Greyhounds as Pets’ program, and track what happens to those greyhounds.
2. Registration of greyhounds, industry participants and trial tracks

Divisions 1 and 2 of Part 3 relate to the registration of greyhounds, industry participants and trial tracks, which is the responsibility of the Greyhound Welfare and Integrity Commission under Greyhound Racing Act 2017 (the Act).

Provisions relate to applications, conditions of registration and requirements to provide information to the Commission. Division 4 of Part 3 relates to the registers which will be kept by the Commission and the Commission’s ability to share information with specified agencies.

The proposal to expand the definition of greyhound racing industry participants to include providers of health services to greyhounds and others who have contact with racing greyhounds is strongly supported. Dogs in the care of many of these new categories of participants are at risk and stringent monitoring by the Greyhound Welfare and Integrity Commission is required. The NSW greyhound racing industry must pay the cost for GWIC utilising these expanded powers, not the taxpayer.

The proposed register of greyhounds does not deliver the NSW Government’s promise for lifetime tracking of greyhounds. The ability for owners and trainers to register their dogs as ‘adopted’ to themselves or a close associate takes advantage of a loophole where GWIC no longer monitors the animal, which can then be killed. The regulation must include a mechanism for lifetime tracking of a greyhound so the public can establish what happens to greyhounds once the industry no longer wants them.

3. Registration of greyhound racing clubs

Division 5 of Part 3 contains provisions related to the registration of greyhound racing clubs, which is the responsibility of Greyhound Racing NSW under the Act.

No comment.

4. Penalties

Penalty notice offences are set out in Schedule 1 of the proposed Regulation. Penalty notice offences form part of a suite of disciplinary options, which include disciplinary action under the NSW Rules of Racing and offences under the Act.

The penalties provided are completely inadequate and not in proportion with the offences as detailed in the Greyhound Racing Act 2017. Penalties must be significantly increased and should be used in parallel with, not as a replacement for, prosecution.

5. Other issues

Other issues included in the proposed regulation include the miscellaneous provisions of Part 4, related to delegation, certificate evidence, information exchange and the repeal and saving of previous instruments.

The proposal for information sharing between the greyhound racing bodies and animal welfare bodies, law enforcement and other Government agencies and bodies is strongly supported. This power is important to allow greyhound racing participants who engage in animal cruelty, live baiting or other criminal acts to be identified and prosecuted and to save the lives of animals who are at risk.
The Regulation fails to clearly establish a puppy bond, as was promised by the NSW Government.

The Regulation should include the clear provision for introduction of a Puppy Bond. In conclusion, the Greyhound Racing industry has proven time and time again that it is unable to reform and whilst this regulation is a tiny step forward, it will not prevent the deaths and suffering of thousands of dogs. The only solution is to ban greyhound racing in NSW.

End...
To the Office of Racing,

Here is my response to the draft regulation. I was told verbally on Friday 19th that I could send my response on Monday.

A. **The Regulations do little to address the unacceptable disposal and killing of greyhounds and export by non-industry participants.**

One of the recommendations that came from the Greyhound Industry Reform Panel was ‘the life cycle management of all greyhounds’.

This is the reality: there is absolutely nothing stopping an industry participant reporting a change of ownership for their greyhound or greyhounds, and that person, who is not a greyhound racing participant, organises to get the greyhound killed. Non-industry participant can also organise to have the greyhound exported to countries like China. All the efforts to reduce the number of greyhounds killed is wasted if you don’t close this loop hole.

**Recommendations:**
1) GWIC needs to have access to the companion animals register and be diligent in checking the whereabouts of these dogs once they have left the industry.

2) Industry participants will be held responsible if they sell to a non-industry participant and the greyhound is exported to a country that Greyhounds Australasia do not issue passports for.

B. **The Regulations, Legislation and Recommendations from the Greyhound Industry Reform Panel are built on a falsehood which has been totally ignored: there are simply not enough homes for the greyhounds born in NSW.**

Where do you expect them all to go?

If you look at the total figures for greyhounds breed within Australia and New Zealand (the bulk being born in NSW), the following number of greyhounds were bred:

2009 – 12 564
2010 – 12 261
2011 – 12 882
2012 – 12 823
2013 – 13 010
2014 – 12 249
2015 – 12 480
2016 – 12 623
2017 – 8 890

These figures obtained from the Greyhounds Australasia Stud Book.

These figures should make it very clear:
1) The number of greyhounds being re-homed and adopted is nowhere near these figures. So where is the consideration about actually how many greyhounds can find homes?

2) As the bulk of greyhounds bred in NSW, NSW needs to give consideration about how many can be re-homed in the whole of Australia and even New Zealand, not just NSW.

Recommendations:
1) Research into how many greyhounds can be adopted in Australia, per year.
2) It must include the whole of Australia.
3) Once a figure is established then this figure needs to be the driving force for the cap on greyhounds bred.
4) The other alternative is that the industry and industry participants pay for a sanctuary where greyhounds can live.

If you don’t address A and B, then the whole of the life-cycle management and making industry participants responsible for what happens to greyhounds after they career has ended (or not even started), is absolutely pointless.

If animal welfare is a priority then the above needs to be the priority. Or are you just paying lips service to the animal welfare. Killing discarded greyhounds is not consistent with high animal welfare actions.

C. The annual report from the Commission needs to include the following:

- Greyhounds born
- Greyhounds in the industry. Greyhounds killed within 12 months of being adopted outside of the industry.
- Greyhounds killed and reasons for being killed
- Greyhound injuries, by injury type and track.

D. Every time a dog dies on the track or there are catastrophic injuries, an inquiry need to be carried out and a copy of the report available to the public.

On the 4th May at Nowra greyhound track, the catching pen closed prematurely. This resulted in a catastrophic injury to Double Flash and serious injuries to 2 other dogs. I can’t find any record of an inquiry happening into this incident. Why not? It simply is not good enough.

All catastrophic injuries need to have an inquiry and timely reports published. These should also go into the Commission’s report each year.

The residents of NSW are financially contributing to the industry now, whether we like it or not, and so everything must be transparent.

E. Penalties
The penalties are inadequate and do not reflect the position of the general public.

from [redacted]
Dear Sir/Madam

Introduction
We refer to the consultation on Greyhound Racing Regulation 2019. We apologise for missing the Friday 19 July deadline, and hope you will accept our short submission today.

About us
As our name suggests, we are a group of lawyers with an interest in the welfare of animals. Many of our members are also members of the Law Council of Australia. Some are also members of State law bodies. Our purposes are:
(a) to provide advocacy on animal welfare issues; and
(b) to promote community awareness of animal welfare; and
(c) to promote changes to the law that will benefit animals and/or advocacy by animal welfare advocates.

Submission
We have a particular interest in governance and effective law enforcement. In that vein, in our submission there should be:
- Greater transparency by the Greyhound Welfare and Integrity Commission to satisfy the public that the industry is behaving properly. For example, there should be full disclosure of the use of investigation and enforcement powers and of penalties imposed under the regime.
- Penalties sufficient to be effective to deter illegal activity. The proposed Penalty Notice penalties in the Regulations do not appear to be large enough to meet community expectations, particularly if there develops a tendency to rely on that regime rather than prosecution (where the penalties in the Act are significantly higher).

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1 We note apart from Penalty Notices, also the possible use of conditions on registration: The GWIC website about the proposed Code of Practice says “Breaches of the code of practice can be dealt with through requirements such as imposing a condition on registration....”
2 relating to live baiting and Code of Practice (to provide for minimum standards of care for greyhounds) offence provisions
We note that concerns such as these are topical and have been themes coming through in other regulatory contexts; and they have been the subject of much public debate, such as in the just-released APRA Capability Review, June 2019 (the discussion and recommendations in chapter 6, for example, in relation to greater transparency and reviewing the adequacy of penalties).

Our submission is that addressing these issues during the establishment phase would contribute to more effective regulation and go considerably further in restoring public confidence. This also more accords with the observations of the Greyhound Industry Reform Panel:

“Our aim is to put the promotion and protection of animal welfare at the centre of new industry arrangements and to impose the strictest measures in the country to address animal cruelty. We believe this is crucial to the future of greyhound racing in NSW and to build the community’s confidence in its integrity” (p.4).

We are aware of the submission prepared by Australian Ethical dated 18 July in relation to increasing the effectiveness of the proposed regulations. We support the submission, particularly the idea of fuller disclosure regarding the industry’s treatment of animals in its care.

Thank you for considering our submission despite its late lodgment.

Yours sincerely

Alan Shaw for Animal Welfare Lawyers