

Improving Welfare Outcomes for Tasmanian Greyhounds

Project Report

July 2024



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1 Overview

1.1 Governance in the greyhound racing industry

It is widely accepted that there are entrenched animal welfare issues in the greyhound racing industry, whether that be in Tasmania, nationally or internationally.

As a result, there are increasing community concerns about the lack of transparency, the lack of independent animal welfare oversight, and the amount of public money being invested into the sport. This has resulted in a significant decline over recent years in the industry worldwide.

Australia is now one of only seven countries in the world with a commercial greyhound racing industry — but it's by far the biggest. There are 58 active greyhound tracks in Australia, including two in Tasmania. By comparison, the United Kingdom has 21 tracks, Ireland has 17, New Zealand six, and the United States and Mexico have one each.

Over the past five years, there have been a number of reviews into the racing industry in various Australian state jurisdictions.

Most of these reviews have made strong recommendations as to the need to improve governance standards in the industry generally; and also specifically relating to animal welfare standards. Unfortunately, there has been little progress in implementing many of these recommendations.

A robust and contemporary integrity framework is essential in ensuring improved animal welfare outcomes.

These principles must underpin such a framework:

- All participants in the industry have an obligation to support and meet both animal welfare and integrity objectives;
- Industry governance must be effective and the processes that underpin probity and integrity should be simple, efficient and transparent;
- The industry's integrity system must be robust with education, compliance, and enforcement functions that are funded appropriately,
- Commercial and regulatory functions should be clearly separate; and
- The system must be easily understood by participants and the community.

At present in Australia, there is no perfect state/jurisdiction model for the governance of the greyhound racing industry. Across the board, the lack of effective external regulation and enforcement measures has in effect resulted in self-regulation by the industry.

Some people will never agree that animals should be used for human entertainment. Others argue greyhound racing is an intrinsic part of the Australian culture.

However, our world is changing – and community attitudes to acceptable behaviours are also changing. Activities involving human-animal relationships, especially when animals are used for entertainment, will have to move with these changes.

Leading industry participants recognise this.

After the ABC's 7.30 report in 2019 about the unfathomably cruel treatment of what has been euphemistically called "thoroughbred wastage", Hall of Fame thoroughbred trainer, Lee Freedman, said "if we don't make real changes, the court of public opinion will bury racing". While he was speaking about thoroughbred racing, this is equally true of the greyhound industry.

The NSW Greyhounds Welfare Integrity Commission (GWIC) is on record as stating:

"The laws, rules, and codes which the Commission administers are designed to align as closely as possible with existing community expectations about welfare and integrity."

Participants who adhere to these requirements not only protect themselves from penalty but also assist in protecting the reputation, and therefore the future, of greyhound racing. ... Genuine public confidence in greyhound racing can only be built by demonstrating high standards of welfare, integrity, and compliance within the industry.” (Greyhound Welfare and Integrity Commission, 2021 Annual Report)

The Tasmanian greyhound racing industry must recognise its failing social licence if longevity is a priority.

If greyhound racing is to have a future within this state, then it must be built upon transparency and cooperation between all stakeholders. The industry must also recognise that the financial costs of ensuring welfare for the lifetime of animals are an essential component of business. Welfare costs must not be viewed as optional, and must not be left to be funded by the government.

The key animal welfare issues identified within the Tasmanian greyhound industry include:

- overbreeding;
- inability to track greyhounds as they move through their racing life;
- outdated euthanasia policy;
- limited data transparency, lack of data verification, and an overreliance on self-reported data;
- uneven funding between operational and regulatory functions; and
- lack of clarity with respect to the respective roles of local government, RSPCA Tasmania, ORI, other private rehoming organisations, Tasracing’s GAP, and the Tasmanian police.

These issues require fundamental changes to the governance and operation of the industry if it is to have a future in this state.

Key amongst these changes must be the implementation of a comprehensive lifecycle tracking system for all greyhounds. This is necessary to address community concerns about the overbreeding of dogs in the industry and the perception that there is unnecessary euthanasia of dogs that are unsuccessful in racing or are retired.

1.2 Background to this report

The purpose of this report is to review ways in which welfare outcomes for Tasmanian greyhounds can be improved.

Of particular importance are the issues relating to lifecycle traceability, including:

- traceability ending upon retirement;
- lack of traceability for greyhounds sent interstate;
- lack of traceability for greyhounds sent overseas;
- lack of traceability for greyhounds coming into the state; and
- options for improving rehoming outcomes, recognising the limitations of the TasRacing GAP program.

Whole of life tracking is the only way to ensure improved welfare outcomes for racing greyhounds. To be effective and credible, such a system must track greyhounds for the whole of their natural life including birth to death record-keeping, not tracking a dog merely while it is actively engaged in racing, and tracking all greyhound pups, whether they are named and/or micro-chipped or not.

However, there are a number of other measures which must be taken in order to ensure improved welfare outcomes and to improve accountability and transparency.

One key area is that of co-ordination and consistency across the regulatory bodies involved in the racing industry.

The Joint Select Committee in their 2016 report on Greyhound Racing in Tasmania identified that there needed to be a review of the communication methods between Tasracing, ORI, animal welfare agencies, and industry stakeholders to ensure welfare is maximised (Joint Select Committee, 2016 cited in Hutton McCarthy, 2021).

Little has changed in the eight years since that report. It is to be hoped that the passage of *the Racing Regulation and Integrity Bill 2024* and the *Racing Regulation and Integrity (Consequential Amendments) Bill 2024* will address these shortcomings.

1.3 Summary of Recommendations

This report provides an overview of greyhound welfare initiatives within Australia's other states and territories. After detailed investigations and careful consideration of the information gathered, this report proposes the development and implementation of a Tasmanian Greyhound Traceability System (TGTS).

The establishment of the new Racing Integrity Committee and its relationship with Tasracing will be relevant to how this is achieved. This relationship will need to recognise the need for change, and the importance of improving transparency and accountability across the industry.

In order to deliver this outcome, it is recommended that the government undertake the following steps:

1.3.1 Industry reporting

- Implement of Recommendation 30 of the 2016 Joint Select Committee Report into Greyhound Racing in Tasmania in full.

This proposed that the government establish standards and identify benchmarks for improving animal welfare outcomes in the greyhound industry, and that the relevant information should be included in Tasracing's annual report.

- As a minimum, require Tasracing to publish biannual comprehensive reports that include the following data:
 - the number of greyhounds in Tasmania and their status;
 - the number of litters in the period;
 - the present rehoming capacity of the industry and performance statistics for each accredited rehoming organisation;
 - detailed review of injuries;
 - detailed review of causes of death (including euthanasia);
 - the import and export of greyhounds; and
 - retirement outcomes for greyhounds.
- Tasracing should be required to provide detailed and specific information about greyhound welfare programs in their annual report, including budget to actual financial information.

1.3.2 Traceability systems

- Immediately mandate the adoption of the NSW eTrac system with improvements to ensure that identified loopholes are addressed, and that there is a commitment to continuous improvement.
- This system should include a series of mandatory check-in requirements for all greyhounds, as follows:
 - 6 months for pre-racing greyhounds;
 - 6 months for racing greyhounds; and
 - 12 months for retired greyhounds.
- Introduce changes to existing legislation and regulations in order to further strengthen governance and animal welfare outcomes of the eTrac system.
- Require Tasracing to allocate appropriate funding for these measures from within its current government appropriation.

1.3.3 Rehoming and rehabilitation

- Recognising the serious oversupply issues in the industry, require applications for breeding, with the number of breeding applications allowed each year restricted in proportion to the rehoming capacity of the industry.
- Amend the *Animal Welfare Act 1993 (Tas)* to expand the definition of abandonment to explicitly require the rehoming of greyhounds.
- Immediately implement Recommendation 18 of the 2016 Joint Select Committee report on Greyhound Racing in Tasmania.

- This required mandatory education and training on contemporary animal welfare standards and the provisions of the *Animal Welfare Act 1993* be required for all licensed participants within the greyhound industry.
- Immediately implement Recommendation 15 of the 2016 Joint Select Committee report on Greyhound Racing in Tasmania, namely that the Government commission an independent review of the (Tasracing) Greyhound Adoption Program and other adoption services. This review is to include examination of existing funding and resources for greyhound rehoming/adoption programs as well as investigating additional mechanisms to support such programs with a view to increasing the number of greyhounds rehomed.
- Ensure all accredited greyhound adoption providers are equally and adequately funded to rehabilitate and rehome retiring greyhounds and greyhounds deemed unsuitable for racing.
- Task TasRIC with developing a scheme to ensure that every greyhound will have access to the necessary resources to ensure their quality of life once they have left the industry.

1.3.4 Other measures

- Commit to immediate and complete implementation all outstanding recommendations of previous reviews and reports, including (but not limited to) the 2016 Joint Select Committee Report. Specifically, this should include making continued government funding of the greyhound racing industry conditional on upholding contemporary animal welfare outcomes
- During its current term of office, commit to development of a clean-sheet replacement Animal Welfare Act that will ensure our laws reflect both contemporary community expectations and best practice, and set the scene for the next two decades of animal welfare regulation. At the same time, maintain a program of review and amendment of the current Act.
- As a matter of urgency, require TasRacing to:
 - review and update the Tasmanian Rules of Racing, to ensure animal welfare is accorded the highest priority; and
 - develop and implement a comprehensive Code of Practice for greyhounds.
- During its current term of office, commit to the establishment of a cross agency Animal Welfare Commission based on the Victorian model, and task it with developing an Animal Welfare Plan.

This plan should include specific provisions relating to improving welfare outcomes and the implementation of life cycle traceability systems for racing animals, including greyhounds.

Whilst Tasracing and the Racing Integrity Commissioner would retain responsibilities for development and implementation of lifecycle tracking systems for all racing animals, the Animal Welfare Commission would monitor the industry's progress and performance in relation to these matters and include reporting on these matters as part of the Animal Welfare Plan.

- In the short term, require the Office of Local Government to work with LGAT as the representative of local councils to develop and implement a new state-wide registration system for racing greyhounds.

Once the Animal Welfare Commission is established, responsibility for management of dog registrations and kennel licencing (including those for greyhounds) should be shifted from councils to the new body.

2 The importance of social licence

Public confidence is vital to the sustainability of the Tasmanian greyhound racing industry.

In order to ensure the community can have confidence in the industry, there must be a robust and transparent framework based on these principles:

- maintaining public confidence in the racing of animals in Tasmania where it is legal; and
- ensuring that all persons either participating or betting in the industry act with integrity; and
- ensuring adequate safeguards are in place for the welfare of animals within and retired from the industry.

These principles were described within a Queensland racing inquiry as the “general framework for the industry’s social license to operate” (MacSporran, 2015 cited in McCarthy, 2021, p. 209).

It is clear that the Tasmanian greyhound racing industry has much to do if it is to maintain a social licence and become financially viable when the current government funding deed expires in 2029.

The comments of former High Court Justice Michael McHugh in his 2016 report into the greyhound racing industry in NSW are relevant today to the industry in Tasmania:

“Public confidence in the industry is ... vital if it is to continue. Establishing or restoring public confidence may never occur - but it is unlikely to occur if the status quo is maintained. A lack of public trust and confidence does more than impede GRNSW’s “strategic objectives”, whatever they might be; it threatens the very existence of the industry. A greyhound racing industry cannot survive unless animal welfare standards consistent with community expectations are introduced and public confidence is re-established and maintained. That is not a “strategic objective”. It is a given.” (McHugh, 2016c, p.186).

It is clear that there is little public confidence in the capacity of the Tasmanian greyhound racing industry to meet contemporary community expectations, especially with regards to animal welfare standards.

For example, 13,619 people signed a petition calling on the state government to end the public funding of greyhound racing in Tasmania which was tabled in the parliament in June 2022. This represents the largest e-petition ever brought before the Tasmanian Parliament.

A 2023 report from EMRS commissioned by the Coalition for the Protection of Greyhounds found that 74% of Tasmanian taxpayers opposed government funding of greyhound racing, and that 43% of would consider changing their vote to support a party that promised to stop public funding for the industry.

A 2021 University of Adelaide report into the social impact of gambling in Tasmania found that 93% of Tasmanians did not participate in greyhound or horse racing during the survey period. Of the 7% that did participate, 3% bet less than once a month, 2% bet between 1 to 3 times a month, and only 1% bet four times a month or more.

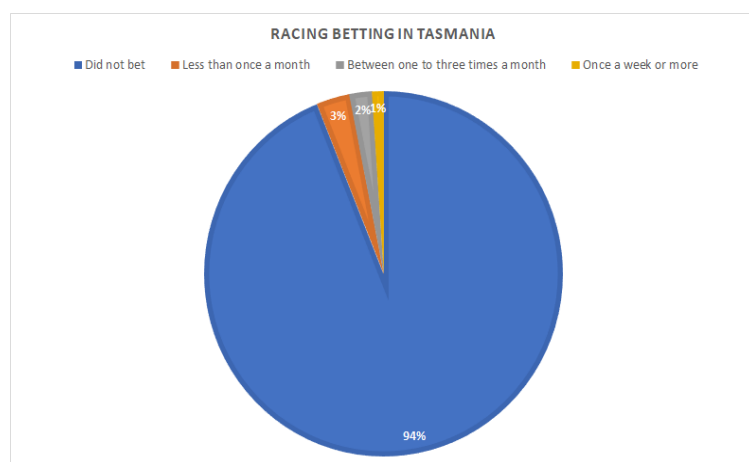


Figure 1: Racing Betting in Tasmania (The University of Adelaide, 2021)

RSPCA Tasmania commissions a quarterly independent survey of community attitudes across a number of issues related to animal welfare. This survey continues to confirm the fact that support for the greyhound racing industry is waning amongst Tasmanians. The majority of people do not support continued government funding for racing in general, and specifically for the greyhound industry.

In the most recent survey (March 2024):

- the majority of Tasmanians believed that mistreatment and abuse is tolerated in the racing industry (56%);
- less than one third agreed that racing animals are well looked after in their retirement (31%);
- almost half believed that race fixing is common (49%); and
- Tasmanians were evenly split in believing that racing in the state is transparent in their operations (42% disagreed, 43% agreed).

Perceptions of animal racing industry
Total population

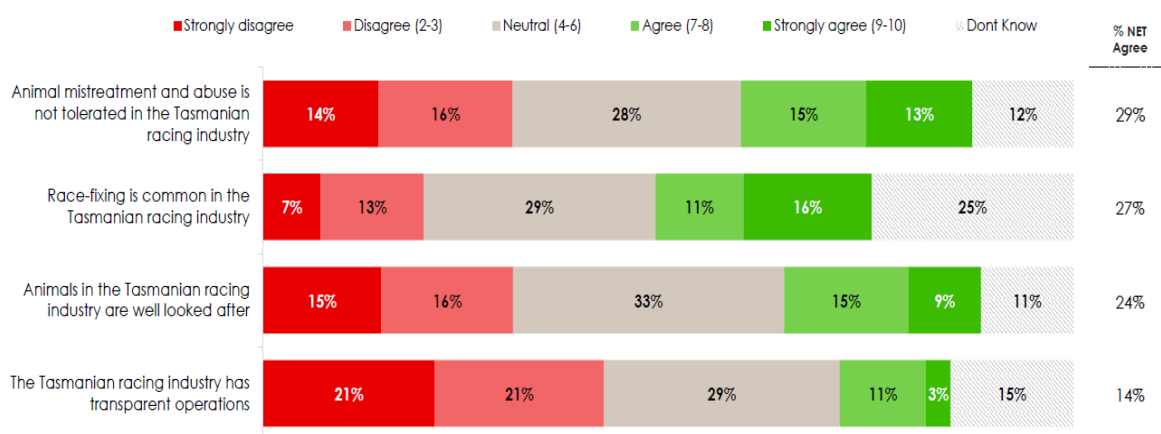
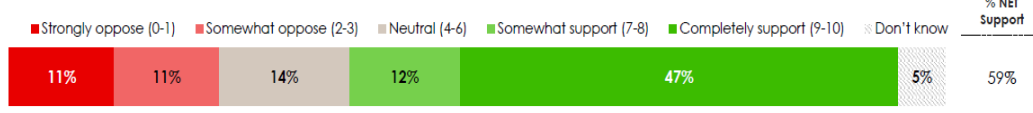


Figure 2: Perceptions of the animal racing industry (Verian Research, March 2024)

Three in five Tasmanians supported the idea of de-funding the greyhound racing industry (59%), the same proportion that supported de-funding animal racing in general (59%). A notably higher proportion of Tasmanians supported strengthening welfare protection for animal racing (78%), with only 3% indicating that they would not support such an initiative.

Support for de-funding greyhound racing
Total population



Support for de-funding animal racing
Total population



Support for strengthening welfare protection in animal racing
Total population

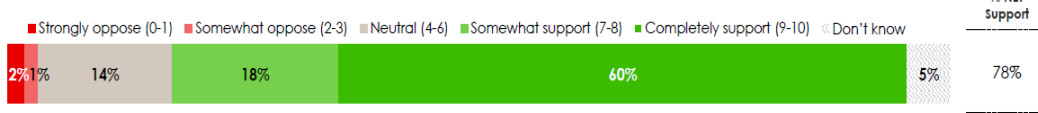


Figure 3: Support for de-funding greyhound racing (Verian Research, March 2024)

These results are at least in part driven by community perceptions that many greyhounds have their lives cut short once they can no longer turn a profit for their owners.

Whether or not this is a reality is almost irrelevant.

It seems that every week, examples of devastating failures of animal welfare in the greyhound industry come to light.

Just this year, investigations of welfare and governance failures in several states have resulted in threats by government to shut the industry down.

This is not unique to Australia.

The NZ government has issued repeated warnings to the industry to clean up its game. Recent polling has shown that 74% of New Zealanders favour a total ban on greyhound racing and media reports indicate that a decision on the future of the industry is likely soon.

A Private Member's Bill introduced into the Scottish parliament this month (July 2024) received the backing of MSPs from across the political spectrum. It will be considered by the parliament later this year.

A 2019 opinion poll found that a majority of Irish voters (66%) agreed that the government should stop funding greyhound racing, with just 16% disagree with defunding the industry, and 18% saying they don't know. This continues to be a topic of active discussion in the Irish parliament.

Greyhound racing, once widespread in the USA, is now on its last legs, with racing now legal at only at two tracks in West Virginia.

Unless the Tasmanian industry takes steps to address negative public perceptions, it too will risk total loss of social licence.

The industry in this state has been slow to recognise this challenge. Introduction of a whole-of-life tracking system will also enable the industry to demonstrate its commitment to improved animal welfare outcomes. Increased transparency and accountability with respect to welfare outcomes and industry performance will also be important in addressing community concerns.

3 Animal Welfare Reporting

3.1 Overview

The importance of timely, comprehensive, and accessible data about all aspects of the industry cannot be overstated. High quality data can be used to address community perceptions of industry performance. It will also highlight areas where improvements have been achieved and areas where greater attention is needed.

Summary data provides an overview of welfare measures within the industry and comparative analysis ensures that all jurisdictions are held accountable to their industry peers and stakeholders. Further, this allows for analysis to identify outliers. However, the ability of observers to perform these vital functions is limited by a distinct lack of readily available data and a trend of mismatched data categories being reported which prevents comparison between jurisdictions.

Summary data is typically produced from a compilation of steward reports over a given period of time (Chang et al, 2022). Stewards' reports themselves must then be analysed for details of individual injuries and fatalities.

However, it must be noted that there exists a risk if further data is requested from the industry as the present means of collecting data is effectively 'bottlenecked' through under resourced parts of the industry.

If data collection and reporting systems are to be brought up to acceptable standards, the industry must recognise:

- The importance of consistency in data content and format.

For example, there is a trend in the industry to base injury rates upon starters as opposed to individual dogs. This is misleading to the general public in that they assume that the injury per starter rate can be equated with the injury per dog rate. However, this is not the case.

In SA, the published injury rate in 2021/2022 was 2.99% across 31,354 starters. However, given there are only 1125 individual greyhounds in the SA racing industry, this equates to an unacceptably high injury rate of 83.2%. (Ashton and Thomas, 2023).

- The need for an increase in resources to ensure that the process achieves the desired outcome. This is in no way a suggestion that further funding be sought from government to improve data collection and reporting processes, but rather a reallocation from other areas, such as prize money.

The introduction of a new database system, OneGov, in NSW highlighted challenges in changing data collection systems. For a period after the introduction of this new system, stewards were required to provide and input information into the old system (OzChase) and the new system (OneGov) concurrently. The NSW GWIC identified that the quality of the data collection for existing standards was reduced given time consuming and resource intensive administrative issues surrounding the new system. (Select Committee on the Greyhound Welfare and Integrity Commission 2022, p.31).

3.2 Comparison of welfare statistics reporting at a state level

A comprehensive analysis of available data on race events, animal health, injuries, and fatalities is required in order to make evidence-based recommendations with respect to animal welfare standards.

Unfortunately, comparing relevant performance data across jurisdictions in Australia is not possible.

This is shown in an analysis of available data which was undertaken by:

- reviewing the webpage of each state or territory regulatory authority;
- a broader web search; and
- seeking confirmation through contact with the authority itself.

The analysis of the data available can be seen in figure 4 below. (Note that greyhound racing is banned in the ACT.)

	Puppies whelped	Litters	Retirement breakdown	Transfer between jurisdictions	Retirement breakdown	Euthanasia breakd	Death breakdown	KEY
NSW								PRESENT
VIC								ABSENT
SA								
WA								
TAS								
NT								
QLD								

Figure 4: Data reported by jurisdiction

As can be clearly seen, the information available for the Tasmanian industry fails to meet the best practice standard set in NSW and falls well short of meeting community expectations.

A more detailed report undertaken in 2022 analysed the information across jurisdictions. (Chang et al, 2022.) The report identified that NSW, Victoria, and Queensland were the three states with the highest number of active racetracks. The remainder of their analysis was then focused on these three sources. The frequency of reporting was one of the metrics considered.

State (regulatory body)	Stewards' reports	Quarterly reports	Annual reports
QLD (QRIC)	✓	✓	✓
NSW (GRNSW)	✓	✓	✓
VIC (GRV)	✓	X	✓

Figure 5: Frequency of data reporting (Chang et al, 2022.)

Consistent issues noted by these researchers included the lack of access to restricted data and thus the reliance upon industry published data, and the differing formats between data published by stewards.

The specific errors within stewards' reporting included double counting, incorrect categorisation and the use of the term 'animal actions' to include trials, injuries, and deaths instead of having this data separated which acts as an impediment to stakeholders searching for comparable data.

One of the report's recommendations was to standardise and harmonise steward report format terminology between states.

However, even if this recommendation were to be accepted, access to data would most likely be difficult given the resources required to extract data from each individual race steward's report. Ensuring that all data categories are consistent and that input is made to follow a uniform template would be a significant improvement. Ideally, this issue could be solved through a publicly available nationally harmonised database.

3.3 International benchmarking

The Greyhound Board of Great Britain provides the most comprehensive life cycle tracking and reporting regime.

Their strategy for ensuring greyhound welfare details the below initiatives related to data within the industry (Greyhound Board of Great Britain, 2023):

- ongoing reviews of the methods of data collection, publishing, and interpretation;
- increasing the granularity of the database for injuries;

- the data system has automatic alert measures that call a relevantly qualified person to attend a track to inspect if there has been a 'spike' in injuries;
- allowing easy access to data for research purposes; and
- identifying potential correlations between current industry practices and injuries.

The GBGB has recently hired a data analyst to correlate this industry data and identify trends in animal welfare.

Further, the GBGB provides annual data on injuries and euthanasia which is verified against track veterinary documents by an independent accounting and auditing firm. OneTrack is selected annually for a full audit, whilst all other tracks are put through a sample audit; if discrepancies appear then the sample size is increased.

The greyhound industry also receives annual reports from an independent expert (Dr Richard Payne, , Associate Professor of Veterinary Anatomy, School of Veterinary Medicine and Science, University of Nottingham, and scientific and veterinary advisor to the WVSC of GB). This reporting includes an overview, as well as flagging any unusual patterns in the data. This data is not limited to injuries etc., but it also provides an assessment of potential contagious diseases and ensures that the system is scrutinised so that a problem can be recognised and averted before it escalates.

This is a standard to which the Tasmanian industry should aspire.

3.4 The Tasmanian situation

Neither Tasracing nor the Office of Racing Integrity included statistics for greyhound injuries, rehoming, or euthanasia in their annual reports prior to 2019.

The 2016 Joint Select Committee Report into Greyhound Racing in Tasmania recommended that the government establish standards and identify benchmarks for improving animal welfare outcomes, and that this information should be included in Tasracing's annual report. It would appear that no formal actions have been taken to implement this recommendation.

However, while this was not mandatory, from 2018/19 Tasracing included statistics provided by ORI for breeding, adoption, retirement and euthanasia in their annual reports. Retrospective statistics back to 2016/17 were included in the 2018/19 and 2019/20 annual reports.

Currently, the statistics in Tasracing's annual reports cover the following areas:

- number of greyhounds born each year
- number of greyhounds euthanised each year
- number of greyhounds deceased each year
- number of greyhounds rehomed each year

The following are not yet included in published reporting:

- number of greyhounds 'named' each year
- number of greyhounds 'named' as a proportion of the number of greyhounds born in that year
- outcome for each greyhound born (e.g., euthanasia, death on track, natural death, rehoming as a pet, export, other)
- comprehensive injury statistics for racing and for both TAB and non-TAB tracks, on an annual basis.
- Comprehensive injury statistics for training.
- Injury data that includes the ultimate outcome for any injured greyhounds, including whether the greyhound died on the track; was euthanised; suspended, or retired.

More detailed information on injuries is available via the stewards' reports on the ORI website.

However, this is not in a collated or user-friendly form and is thus relatively inaccessible.

Some information related to ORI is included in the annual reports of the Department of Natural Resources and Environment.

However, only numbers for swabs, positive swabs and licensing and registration numbers for all three codes combined are reported.

The data is verified in part by inspections of greyhound premises by ORI staff, which can confirm the accuracy of the information given to ORI about greyhounds on the premises but not all premises may be inspected yearly.

3.5 Recommendations

- Implement Recommendation 30 of the 2016 Joint Select Committee Report into Greyhound Racing in Tasmania in full.

This proposed that the government establish standards and identify benchmarks for improving animal welfare outcomes in the greyhound industry, and that the relevant information should be included in Tasracing's annual report.

- As a minimum, require Tasracing to publish biannual comprehensive reports that include the following data:
 - the number of greyhounds in Tasmania and their status;
 - the number of litters in the period;
 - the present rehoming capacity of the industry and performance statistics for each accredited rehoming organisation;
 - detailed review of injuries;
 - detailed review of causes of death (including euthanasia);
 - the import and export of greyhounds; and
 - retirement outcomes for greyhounds.
- Tasracing should be required to provide detailed and specific information about greyhound welfare programs in their annual report, including budget to actual financial information.

4 Traceability Systems

4.1 Overview

Lack of visibility across the entire lifespan of racing greyhounds is a major concern in many jurisdictions, including Tasmania. In general, reporting has been restricted to the period from registration to retirement. Transparency is also thwarted by the fact that what limited information is available is often very out of date - for example, Tasracing reports this information only annually in arrears. Furthermore, because the information is held within Tasracing, there is no way for non-industry stakeholders to access data to monitor outcomes.

This lack of transparency exacerbates community concerns about the fate of greyhounds that are not successful on the track or are at the end of their racing careers.

Introduction of a whole-of-life tracking system is one way in which the industry can demonstrate its commitment to improved animal welfare outcomes. Increased transparency and accountability with respect to welfare outcomes and industry performance will also be important in addressing community concerns.

Key objectives of such programs include:

- protecting the welfare of greyhounds and the integrity of the greyhound racing industry;
- demonstrating transparent and accurate accounting of every greyhound at all stages of their lives;
- enhancing regulation and existing practices to further improve public and stakeholder confidence; and
- better utilising digital technologies that simplify and automate the capture, analysis, and reporting of greyhound health and location related information.

These systems are designed to ensure that greyhounds remain on at least one central register from birth until death, with the notable events in this timeline independently reported and verified.

Tracking systems have been mandatory for most livestock (eg cattle) for many years. However, the traceability mechanisms in these industries are largely built for food safety and biosecurity purposes, whereas lifecycle tracking systems are designed as an accountability measure with the overarching goal of improving animal welfare (RRATRC, 2019).

Similar measures have been implemented across the Australian horse racing industry, with six-monthly updates now required for all active thoroughbred horses and annual reports required for horses within the breeding community (Racing Australia, 2021).

There is no credible reason for any in the greyhound racing industry to oppose introduction of whole-of-life tracking systems. These are now recognised as a standard management tool in racing industries and the systems are becoming increasingly sophisticated as their use spreads.

4.2 Characteristics of successful lifecycle traceability programs

The Jacob Report (2022) identified four models of traceability systems:

- central database operated by government;
- central database operated by a third party;
- an integrated model with studbooks linked to a central database; and
- a robust property identification system with MOUs between state and local governments, welfare agencies (eg RSPCA), and industry to access data.

This report also outlined the necessary elements of a successful traceability system.

This work focused upon horse traceability, where the primary driver was biosecurity and compliance failures posed a significant threat not only to the nation, but also to individual business operations.

Having said that, with some lateral thinking, the results can be more broadly related to greyhound traceability.

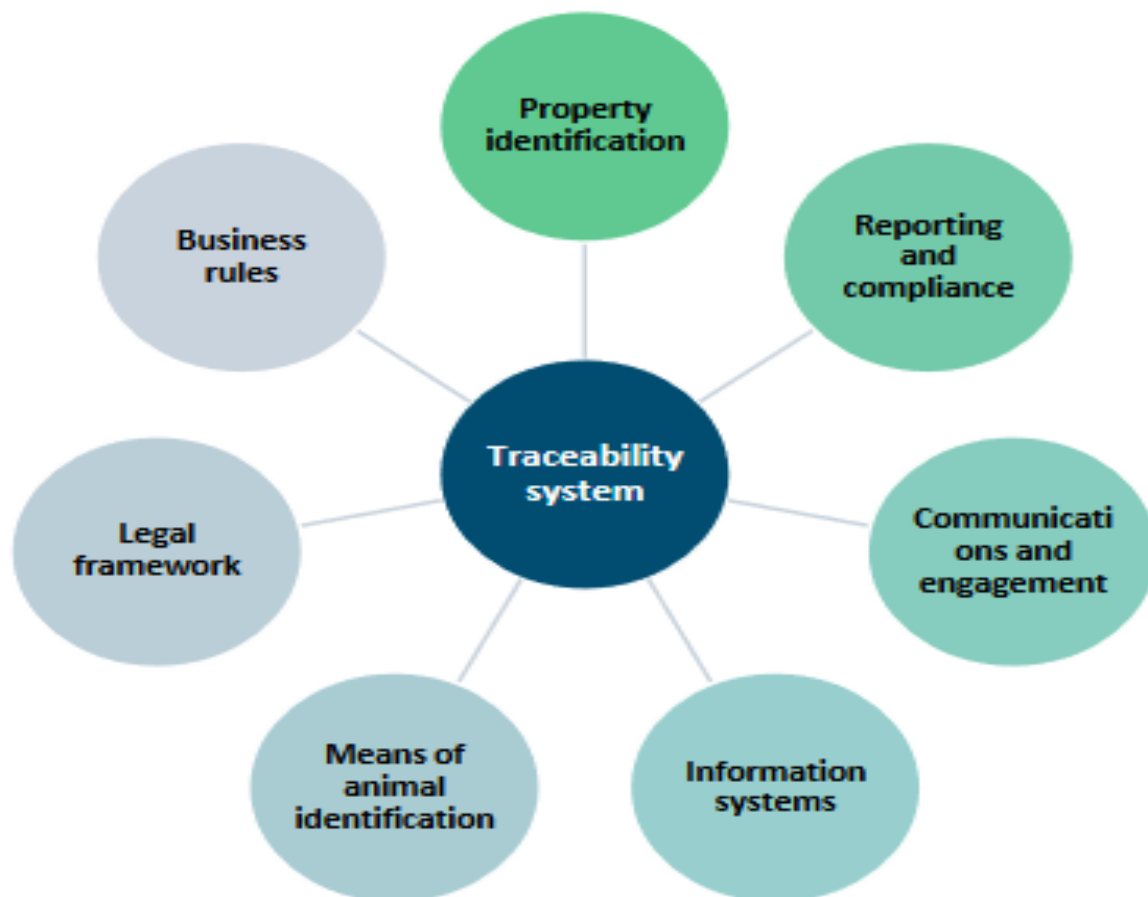


Figure 6: Elements of a successful traceability system (Jacob 2022)

4.3 Greyhound lifecycle tracking systems in Australia

The adoption of lifecycle tracking systems is at varying stages across the country. Implementation in some states (NSW, Victoria) is well advanced. Queensland is moving ahead, and the SA government has recently agreed to implementing the NSW system. There has been no public discussion about mandating requirements for lifecycle tracking in Tasmania, Western Australia, or the NT.

The discussion below provides a brief overview of the current status across the states and also considers the status of schemes in some international jurisdictions.

4.3.1 NSW

The NSW greyhound racing industry was first mover in this space. In 2021, the NSW Government granted GWIC \$3.59 million to develop and implement a world-first eTracking system to help monitor the location and welfare of all greyhounds registered in NSW.

This enables the location of every registered greyhound in NSW to be tracked in real time at each stage of their life.

An integral part of the eTrac system is a 'one stop shop' online portal where participants can access their registration and greyhound information, and complete transactions such as vaccination notifications, registration renewals, updating kennel locations, owner/trainer transfers, and view details of greyhounds in their care.

This new digital capability has improved the regulator’s ability to protect the welfare and integrity of the NSW greyhound racing industry by taking day to day transactions completed by participants and GWIC staff online, making transactions quicker and easier for all. This also generates real-time information that increases transparency across the board.

Greyhounds are tracked through their ‘contact’ with GWIC through their eTrac record.

If a greyhound has had no contact with GWIC in the required period, a request to have the greyhound sighted and scanned will be sent to the greyhound’s custodian.

No scheme is perfect – and this one certainly has some deficiencies.

In its initial form, tracking was mandated only for registered and actively racing greyhounds. This left some loopholes for greyhounds to slip under the radar. The information is not yet publicly available, and that too is seen as a shortcoming by animal welfare advocates.

Having said that, all stakeholders agree this is an important step in the right direction.

However, GWIC has made it clear the scheme will be constantly evolving. It is actively looking to expand the data that can be tracked by the system. This includes the introduction of nose-print recognition, which is new technology emerging from Korea. This will allow industry participants and anyone in the community to identify a greyhound simply by matching a unique nose-print to information stored in the database. GWIC is also intending that there will be public access to the data in the next few months.

All industry participants were legally required to have created an eTrac account by November 2023.

Information about the program is available here: <https://www.gwic.nsw.gov.au/welfare/whole-of-life> and a more detailed analysis follows in Appendix A below.

4.3.2 Victoria

In 2023, the Victorian state government announced a commitment for Greyhound Racing Victoria to implement digital ‘tracking and tracing’ technology to better monitor the location and welfare of all Victorian registered greyhounds, and immediately commenced work on developing a digital greyhound tracking program which will roll out various initiatives to enhance and automate greyhound tracking.

Greyhound tracking is already undertaken by the industry through multiple mandatory check-ins. This includes:

- before pups are microchipped at 12 weeks;
- when greyhounds are named;
- every time they race or breed;
- when they move between participant properties; and
- during official kennel inspections and when they retire and are rehomed.

However, many of these check-ins rely on manual processes that are time consuming and at risk of human error.

GRV’s Digital Greyhound Tracking program will introduce digital systems to automate greyhound check-ins and improve the frequency and range of opportunities for participants to digitally check in their greyhounds across all lifecycle stages.

Information about the program is available here: <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://grvauoprdfasttrackstr03.blob.core.windows.net/webcontent/documents/low%20res%20FastTrack%20FINAL%20Release%20Quick%20Guide%20Booklet.pdf>

4.3.3 Queensland

A 2015 review of the Queensland greyhound industry emphasised the significant issue of wasting and overbreeding: between 2003 to 2013 it was estimated that the wastage rate was an average of 30% (MacSporran, 2015).

The MacSporran report also stated that between this same time period approximately 7000 greyhounds were unaccounted for as the records for greyhound retirements was inaccurate (MacSporran, 2015). One of the report's recommendations was the implementation of lifetime traceability that included accurate details on euthanasia and injuries.

As a result, a partial tracking system including online registration and licensing was introduced by the Queensland Racing Integrity Commission in 2020. The system has been described as providing "holistic greyhound life-cycle tracking".

However, as with the initial iteration of the NSW eTrac system, greyhounds were only tracked from birth to de-registration.

With the assistance of a state government grant of \$4.95 million, QRIC has now implemented an online registration and licensing system with the ability to collect, maintain and appropriately share information relating to Queensland racing licensees in the three codes of racing thoroughbreds, harness, and greyhounds.

To support the lifecycle tracking of greyhounds, a three-tiered model of breeding categories covering the lifecycle of greyhounds from service through to training for engagement in racing has been implemented. However, the traceability of a greyhound ends upon the greyhound being rehomed to a non-industry participant.

Information about the program is available here: <https://qric.qld.gov.au/news/qrics-4-3-million-online-licensing-system-tracks-greyhound-life-cycles-for-the-first-time/>

4.3.4 South Australia

South Australia remains one of the last jurisdictions to formally separate the commercial and operational functions of the racing industry.

Following the McGrath Nicol report in 2016/2017 the industry implemented an Integrity and Welfare Committee (IWC) and an Integrity Hearings Panel (IHP). However, apart from two independents, the members of these committees are in the employment of GRSA and are therefore not independent from the commercial operations of the racing body.

An Independent Inquiry into the Governance of the Greyhound Racing Industry in South Australia was released in November 2023. (Ashton and Thomas, 2023).

This report put forward a total of 86 recommendations. This included a recommendation made by Greyhound Racing SA that the NSW eTrac greyhound traceability system be implemented. Other recommendations proposed a range of significant animal welfare, integrity and administrative reforms.

In December 2023, the government accepted the Inquiry's recommendations in principle, and announced its intent to appoint an independent Greyhound Industry Reform Inspector who will ensure GRSA is progressing with the reforms. The Inspector will be required to regularly report to the Minister for Recreation, Sport and Racing before providing a final report to the Minister two years after their appointment.

At time of writing, there has been no public report of progress in this process.

4.3.5 Western Australia

The commercial and regulatory functions of the WA racing industry have been separated since 2003.

These functions are managed by WA Greyhound Racing Association (WAGRA) and Racing and Wagering Western Australia (RWAA) respectively. However, little public information is available online regarding traceability measures.

It appears that the traceability system in the Western Australia greyhound industry is largely tacit. The relatively small scale of the industry has allowed a mediocre level of scrutiny that in no way would be appropriate at a larger scale or for implementation in another Australian jurisdiction.

Further, in discussions undertaken during the preparation of this report, RWWA advised that their jurisdiction over a greyhound ends upon a greyhound's retirement. Therefore, any attempt to request further data post-retirement would rely upon voluntary compliance.

There is inadequate legislation to allow further development of a traceability system and, at the time of writing, there has been no indication that the government was looking to introduce more stringent requirements.

4.3.6 Australian Capital Territory

The *Domestic Animals (Racing Greyhounds) Amendment Act 2017 (ACT)* makes it an offence to facilitate or conduct greyhound racing, or to allow for a greyhound to partake in greyhound racing in that jurisdiction. Greyhound racing was also removed from within the *Racing Act 1999 (ACT)*, *Racing (Race Field Information Regulation 2010 (ACT))*, *Totalisator Act 2014 (ACT)*, and the *Racing and Sports Bookmaking Act 2001 (ACT)*, thus making it an offence to bet on greyhound racing in the ACT. The ban on greyhound racing was also implemented into the *Animal Welfare Act 1992 (ACT)*.

However, whilst greyhound racing is banned within the ACT, it is still legal to keep, breed and train greyhounds and then simply race them in another state (ACT Government, 2017). The transition plan offered support packages for industry participants and provides an example of a successful move away from the industry that can act as a guide if similar reform was considered within Tasmania.

Domestic dog companion animals are registered for life within the ACT under the *Domestic Animals Act 2000 (ACT)*. This includes greyhounds, whether racing or companion animals, with racing greyhounds required to be registered annually.

4.3.7 Northern Territory

In 2015, the commercial and regulatory responsibilities for the racing industry were split and delegated to the Darwin Greyhound Association Inc. (DGA) and the Northern Territory Racing Commission respectively.

The industry in the NT is very small and there is only one greyhound track. This makes comparisons with larger jurisdictions problematic.

Following complaints from industry participants, an investigation into the performance of the DGA was commissioned by the government in 2021. The final report was publicly released in 2022. (Hutton McCarthy, 2021).

It identified the significant issues that indicated inadequate governance and oversight by the DGA:

- No discussion of the high euthanasia rate;
- Lack of animal welfare policies;
- Lack of amendments to the relevant racing rules and legislation;
- Failure to provide adequate penalties;
- No substantial reports or data provided on conditions of greyhounds; and
- Lack of appeals processes.

The report specifically noted that there was significantly insufficient data published by industry participants relating to greyhound welfare.

It concluded that the policy framework of the industry must be reformed to ensure minimal overlap and confusion between the role of organisations and pieces of legislation.

Specific recommendations included:

- Amendments to the *Racing and Betting Act (NT)* to stipulate that the Racing Commission has explicit responsibility to ensure integrity of greyhound racing and adherence to the relevant animal welfare standards.

- Amendments to the *Racing and Betting Act (NT)*, the *Animal Welfare Act 1999 (NT)* and the Rules of Racing to clarify the interaction of these pieces of legislation/rules and to dictate a requirement for the Racing Commission and the DGA to report animal welfare issues and breaches to the Animal Welfare Authority.

4.3.8 Tasmania

Whole-of-life tracking is underpinned by specific requirements introduced under the Greyhounds Australasia Rules (GARs) to mandate the notification of the location and activities of greyhounds to ORI (as the controlling body).

For example, GARs mandate that the controlling body should be notified by owners of the following situations: registration of a bitch used for breeding; registration of service; result of the service (or artificial insemination – i.e. greyhound puppies whelped); vaccinations, ear branding, microchipping, registration of litters; changes or transfer of ownership; and relocation of named and unnamed greyhounds. In addition, the reporting requirements in situations where a greyhound is to be euthanised or has died have been strengthened under the Tasmanian Local Rules.

Greyhounds are only eligible to compete in a race when they are registered with ORI. Owners and trainers must also be registered by ORI, as must trial tracks. Changes in ownership of named and unnamed greyhounds must be notified to ORI within 10 days, and ORI must be notified within 3 working days of a greyhound entering or leaving a registered person's care or custody.

The tracking process is reliant on participant reporting at critical stages. ORI's animal welfare officers are empowered to inspect premises to verify this information. However, in reality, physical inspections of properties frequently enough to fully audit the reporting are difficult to achieve. In addition, information received may trigger an inspection (for example, report of a concern or a positive swab).

The inclusion of rearers as a category of participant licencing allows ORI to trace the whereabouts of greyhounds from their birth onwards specifically in the time between when a greyhound is born and registered and before they are named for racing.

Only greyhounds registered with ORI can be monitored and ORI's regulatory role stops when a registered greyhound is rehomed to a non-industry participant. Greyhounds must be registered with the relevant local authority once they have left the greyhound racing industry as a pet dog.

In Tasmania, these details are recorded on the OzChase database.

There is also a further identification method for tracing greyhounds in Tasmania.

The *Dog Control Act 2000 (Tas)* requires all dogs, including greyhounds, to be microchipped and registered with the local council. However, this process is fraught with challenges. There is no formal linkage between racing agencies (including ORI and Tasracing) and the 28 local government authorities in Tasmania. The fact that each of these councils operates its own unique systems of monitoring and enforcement exacerbates the difficulty in ensuring that all greyhounds are individually identifiable.

In theory, these systems should provide robust and reliable data. Inevitably, though, resource constraints and regulatory fragmentation limit oversight capacity. Further, it is difficult to ascertain how effective these systems are because so little information is made publicly available.

Until recently, the *Racing Regulation Act 2004 (Tas)* had not been substantially reviewed since its inception. This resulted in a situation where governance and accountability measures have not kept pace with either the situation in other jurisdictions, or contemporary community expectations.

In 2021, after a series of incidents, the government appointed Mr Dale Montieth to conduct a review to look at ways to strengthen the integrity model in the Tasmanian racing industry, as well as improving animal welfare outcomes.

The final report (*Securing the Integrity of the Tasmanian Racing Industry*) was released in 2022 and made a number of recommendations, including:

- Creating a Tasmanian Racing Integrity Commissioner with powers to set integrity and animal welfare standards and comprehensive audit, compliance, and investigatory functions;
- Enhancing integrity governance within Tasracing, with Tasracing to become operationally responsible for all three Codes of racing and pre-race day and race day management, including Stewards and animal daily animal welfare.

The government agreed to adopt or support in principle all the recommendations made in the report. It has subsequently introduced the *Racing Regulation and Integrity Bill 2024* to implement many of the suggested changes. This Bill is currently before the parliament.

The Montieth Review had a broad focus across the three codes of racing, and made no specific recommendations with regard to the greyhound industry.

A Joint Select Committee on Greyhound Racing Inquiry in 2016 made thirty-one recommendations to strengthen industry governance and animal welfare standards. There was a strong focus on the need for greater transparency and accountability in these Review recommendations.

Whilst progress has been made towards implementing many of the recommendations, there is little publicly available evidence that some key areas have been addressed. These include implementing expanded reporting requirements and ensuring that performance measures are readily accessible in the public sphere.

This is of particular concern, in that there are no mandated traceability or public reporting requirements for the Tasmanian greyhound racing industry.

The lack of available performance data provided by Tasracing is often raised by animal welfare groups (and others) as a major concern. There is a not-unreasonable assumption that there must be something to hide, when other jurisdictions provide much more detailed and timely reports.

This indicates there is room for considerable improvement by Tasracing in this area.

4.4 International greyhound lifecycle tracking systems

4.4.1 Great Britain

The welfare of racing greyhounds in England is covered under the *Welfare of Racing Greyhounds Regulations 2010*. One of the objectives of the Regulations was to have all racing greyhounds covered under a single piece of legislation and to have all owner details within a nationwide database (Department for Environment, Food and Rural Affairs, 2016).

A review undertaken by the Committee in 2016 recognised that transparent, reliable and consistent data is a necessity for the greyhound racing industry as it allows for analysis of how effective welfare measures have been. (Environment, Food and Rural Affairs Committee, 2016).

Following this report, steps have been taken to implement a traceability system through the reform of the Greyhound Board of Great Britain (GBGB) Rules of Racing.

One of the initiatives that has supported the implementation of the traceability system is the Animal Welfare Assessment Grid (AWAG), which allows for the welfare of all individual animals to be monitored over time. This system is a web-based application used to store and visualise assessment data for animal welfare. It was initially developed to monitor welfare of animals being used in science, but its use has expanded in recent years. (GBGB, 2023).

The AWAG is built around four parameters:

- physical: assessing an animal's health by analysing indicators such as injuries, illness and body condition;
- psychological/behavioural: assesses an animals mental needs and health through analysing response to stressors and frequency of exposure to stressors;
- environmental: analysing the environment of an animal to assess if it is being enriched with opportunities to interact with other animals, comfort and choice;

- procedural: assessing the response of an animal to husbandry and clinical events, including such factors as pain of procedure, handling and change in routine.

This approach provides a system of monitoring the impact of welfare initiatives on greyhounds across the industry, as the data can be updated at a set frequency. (AWAG, 2023).

In 2022, the GBGB released *A Good Life for Every Greyhound Strategy* which aims to promote and protect welfare throughout all stages of a greyhound's life.

This strategy identified a number of areas as 'risk points' where a greyhound may fall outside the scope of the traceability system.

The GBGB has proposed a range of initiatives to manage these exit points. One of these is that the jurisdiction of GBGB over a greyhound ends upon a greyhound being transferred out of Britain or into 'unregulated racing'.

4.4.2 Ireland

The Irish greyhound traceability system a greyhound throughout the entirety of their lifecycle from birth, microchipping, registration, racing career, changes in trainer/ownership, location, potential for export, retirement and then death.

The *Greyhound Racing Act 2019* sets out comprehensive requirements with respect to the traceability database. A key aspect of this legislation is that a failure to record data as dictated is an offence under the *Welfare of Greyhound Act 2011*

Some industry participants consider Ireland's system of greyhound traceability the best in the world. However, as the system has been rolled out, compliance issues have emerged.

Non-compliance appears to result from:

- The interval between microchipping and this data being entered into the traceability system. The solution to this issue is to ensure minimal delay between these activities. A suggested solution would be to require the details of a litter to be entered into the system by an independent third party and attached to the birthing bitch's traceability profile at birth. This would ensure that there is a complete paper trail for each pup within a litter.
- Lack of transparency
In an effort to prevent privacy issues, the data on a given greyhound can only be accessed by that dog's actual owner. If a member of the public requires information, permission must be granted by the parliament. These questions are then passed by the relevant minister to the greyhound board and are therefore not entered into the public record. When the figures are released, there is no means of independently verifying their accuracy. This defeats the purpose of the traceability system.
- Failure to account for exports
The Irish traceability system ceases when a dog is exported to countries outside of the UK. There are a large quantity of dogs being exported to countries such as Spain, China and Pakistan and this is simply recorded as 'Export International' with no further information provided. There is growing public concern that the dogs exported to these destinations are subject to far less extensive animal welfare legislative protection than offered in the UK and Ireland.
- Lack of independent oversight
The overarching concern for this system is its failure to be governed by an independent body. In order to ensure credibility and transparency, it must be ensured that the system is monitored by an independent body.

4.4.3 Scotland

Scotland's last remaining greyhound track is not regulated by the GBGB's regulations and thus the Scottish industry has been considered separately.

All dogs within Scotland fall within the scope of the Code of Practice for the Welfare of Dogs established under the *Animal Health and Welfare (Scotland) Act 2006*.

This Act imposes a duty of care for the welfare of owned animals.

A 2023 report by the Scottish Animal Welfare Commission identified the correlation between economic profitability and condition of the dogs. Evidence gathered within the report indicated that, for some participants, “once a dog’s racing career has ended there is little attention paid to nutrition, health and general care”.

The report also recognised that a welfare strategy and traceability model is only as successful as far as it is implemented. There is significant concern that public announcement of welfare initiatives is all talk and no walk. The industry must demonstrate that the needed funding is in place and that the logistics of enforcement have been considered and finalised. These measures must be published to ensure accountability.

The report concluded that no further tracks should be developed in Scotland, as none of the proposed measures appear to be able to appropriately safeguard greyhound welfare. (Scottish Animal Welfare Commission, 2023).

5 A Tasmanian Greyhound Traceability System

5.1 Introducing a comprehensive greyhound traceability system

In their discussion as to a national framework for horse traceability, the Australian Senate identified the following challenges that can be relevant to the development of a greyhound traceability system (RRATRC, 2019), namely:

- establishing and communicating the need and rationale for a register;
- navigating the fragmented levels of control over registration systems and information;
- establishing and determining the existing level of information retained by other levels of government, the accuracy and specificity of this data, and how the existing system can work in parallel to the proposed system;
- ideal method and process of identification;
- the fees, funding, and costs for developing and accessing a traceability system;
- oversight, access and security considerations; and
- education, compliance and enforcement frameworks required to ensure support and success of the system.

In his submission to the Senate Inquiry, Dr Roger Paskin identified the key reasons behind the success of the cattle traceability system as being:

- a clear economic motivation for the development of the system;
- an established, cost effective, and widely accepted system of identification that supports the operation of traceability;
- strong public support;
- strong government support through legislation that enforces compliance; and
- strong support from industry that recognised the need for traceability to ensure industry longevity.

(Paskin, cited in RRATRC, 2019.)

These factors are equally as relevant to the establishment of a greyhound traceability system.

The clear economic motive for a greyhound traceability system is linked to ensuring the longevity of the industry.

Traceability systems within livestock industries enable suppliers to attract price premiums through signalling sustainable and ethical production methods that are favoured by some portion of the consumer market. They also assist in ensuring compliance with food safety standards which underpin consumer confidence.

However, the monetary and economic benefit to greyhound racing is, in a sense, the maintenance of social licence.

There is strong public support for the racing industry to implement further welfare measures. There is also strong support for public funding to be withdrawn from the industry as evidenced by the EMRS and Verian community sentiment reports, as well as the strong support for the 2022 parliamentary e-petition calling for withdrawal of taxpayer funding for the racing industry more generally. These results clearly reflect general public discontent with the industry that is, to an extent, synonymous with strong public support for further welfare measures (Inglis, 2023).

Tasmanian animal welfare legislation is primarily managed beneath the *Animal Welfare Act 1993* (Tas). Whilst the Racing Regulation Integrity Bill 2023 promises some measure of reform, a larger issue is the continuing failure of legislation to be adequately enforced in the industry and for animal welfare more broadly (RSPCA Tasmania, 2023). Reform is needed to ensure that the legislation in place is enforced through appropriate resource allocation, training, education and a whole-of-government approach to these issues.

The cattle industry faced biosecurity and food safety risks that threatened to harm producers.

This external motive was a driving force behind the change in legislation and enforcement capabilities. Further, producers understand the issue and are dedicated to the solution in their own self-interest.

There appears to be significant reluctance within the greyhound racing industry to recognise the existential threats facing the long-term sustainability of their sport.

This is also evidenced in an unwillingness by many to adopt welfare measures which are externally imposed. This stems from deeper cultural issues within the industry which cannot be solved through external management.

The end result of this finding is that compliance must be facilitated both internally and externally.

Many involved in the industry will have only operated under current 20-year funding Deed which expires in 2029. The very generous public funding provided under this Deed has created an artificial perception of economic health within the industry that will simply not translate into a feasible industry post-2029.

The only chance of long-term survival for the Tasmanian greyhound racing industry is for industry participants to understand the reasons and motives behind further welfare measures and to proactively participate in their creation, implementation, and enforcement

5.2 Time for change

It is clear from the evidence gathered in preparing this report that governance and animal welfare standards in the Tasmanian greyhound racing industry are lagging behind those in many other jurisdictions.

This disadvantages those in the industry who wish to demonstrate high levels of compliance. It also highlights community concerns about animal welfare standards in the industry.

The key issues that emerged in the development of this report include, in no particular order:

- an overreliance on self-reported data;
- limited traceability capacity
- traceability ending upon retirement;
- lack of traceability for greyhounds sent interstate or overseas;
- inefficiency of the GAP program;
- outdated euthanasia policy;
- limited data transparency;
- lack of data verification;
- overbreeding;
- uneven funding between operational and regulatory functions;
- loss of traceability as a greyhound moves between registers; and
- lack of definition around the respective roles of local government, RSPCA Tasmania, ORI, private rehoming organisations, the Tasracing GAP, and the Tasmanian police.

Some of these issues may be addressed when the Racing Regulation and Integrity Bill 2023 is passed and the new integrity structure is established. However, in the absence of a specific focus, there is no guarantee that there will be any progress made to improve outcomes.

As part of its response to the Monteith Review, the state government committed funds to investigate some of possible pathways to implement aspects of this review. This report was one of the projects funded.

The terms of reference were to review the issues relating to lifecycle traceability, including:

- traceability ending upon retirement;
- lack of traceability for greyhounds sent interstate and overseas;
- lack of traceability for greyhounds coming into the state; and
- options for improving rehoming outcomes, recognising the limitations of the TasRacing GAP program.

This section of the report specifically addresses the first three of these considerations.

5.3 Establishing a whole-of-life traceability system

5.3.1 Background

The key recommendation of this report is that the government mandate the establishment of a whole-of-life traceability system for Tasmanian greyhounds as a matter of urgency.

This need not be an overwhelming task – and there is no need for reinvention of the wheel.

The NSW eTrac system meets contemporary expectations of effective traceability standards. Furthermore, it is proving to be flexible and efficient and GWIC has demonstrated commitment to continuous improvement of the system. Further details are provided in Appendix A.

GWIC is keen to licence the eTrac system to other jurisdictions. This is an attractive proposition which would enable the licensees to avoid the costs associated with the development of a new traceability system and ensure future development costs are shared across all users.

Importantly, adoption of a shared reporting platform such as eTrac will facilitate collection of data across jurisdictions and improve transparency and accountability for both governance and animal welfare metrics.

The system will be shortly licensed to New Zealand and Queensland has also expressed an interest in a similar arrangement.

It could readily be modified to fulfill Tasmanian requirements.

Introduction of this system will not on its own resolve all issues. Several other measures would help to ensure streamlined and effective outcomes.

The current regulatory structure of the industry is fragmented. Whatever approach is taken, there will be a need for amendments to various Acts and regulations. Changes will also be needed to the Tasmanian Rules of Racing.

One initiative which would strengthen the system would be legislating failure to comply with the reporting requirements mandated under the relevant Local Rules as an offence within the *Animal Welfare Act 1993 (Tas)*. This will ensure that the consequences of any failure to comply with the relevant regulations will not be limited to repercussions within industry. This is a feature of the Irish system.

The use of AWAG in Great Britain provides another example of how a whole-of-life traceability system can deliver vastly improved animal welfare outcomes. Inclusion of the AWAG system in parallel to the regular checkups required under the eTrac system would enable relevant authorities to monitor how well individual greyhounds are being cared for, with the potential to implement automatic alarms if a greyhound's AWAG score falls below a given threshold for a given number of consecutive periods.

Importantly, if a traceability system is to be successfully implemented, sufficient funding must also be provided to enable effective delivery and implementation. A comprehensive education program will also be required for industry participants. Measures will also need to be put in place to ensure that the broader community understands the changes and is able to be better informed about industry performance in the future.

There should be a comprehensive review of the relevant responsibilities of local government with respect to dogs – and specifically greyhounds – with the intention of improving consistency, transparency, and accountability. Having said that, a more detailed discussion of the potential details of this recommendation is outside the scope of this paper.

Incorporation of these additional measures would position the Tasmanian greyhound industry at the forefront of governance internationally

5.3.2 Investment required

The NSW Government provided GWIC with \$3.59 million in 2021 to deliver the eTrac system. However, a significant portion of this cost was allocated to one-off developmental work.

According to advice from GWIC, the software maintenance costs for eTrac were roughly \$65,000 in 2023.

The system also supports two full time staff are dedicated to ensuring the system operates efficiently. The annual cost of these staff is roughly \$220,000. Therefore, the total annual cost is approximately \$285,000 per annum.

Obviously, costs will vary as the system is scaled up and as some jurisdictions come on board.

At the time of this report, no specific pricing has been discussed, as specific requirements for a Tasmanian option have yet to be defined and discussed.

There were 4,450 greyhounds whelped in NSW in 2021-22 (Greyhound Racing NSW, 2022) In the same period, 294 greyhounds were whelped in Tasmania.

A very basic comparison shows that that the Tasmania industry represents 6.6% of the size of the industry in NSW.

This serves as a rough measure for comparing the relative sizes of the industry in terms of animals born that must be tracked. The operational costs can then be compared using this figure. This assumes GWIC wishes to recover a proportional amount of the original set up costs. This would of course be up for negotiation. It also assumes that the staffing requirement would be the same, even though there would be substantially less dogs to track.

	NSW	TAS (ESTIMATED)
START UP COSTS	\$ 3,590,000	\$ 236,940
SYSTEM COSTS (pa)	\$ 65,000	\$ 4,290
STAFF COSTS (pa)	\$ 220,000	\$ 14,520

Figure 7: Notional costs of implementing eTrac in Tasmania

Notional costs over time can then be estimated as shown below:

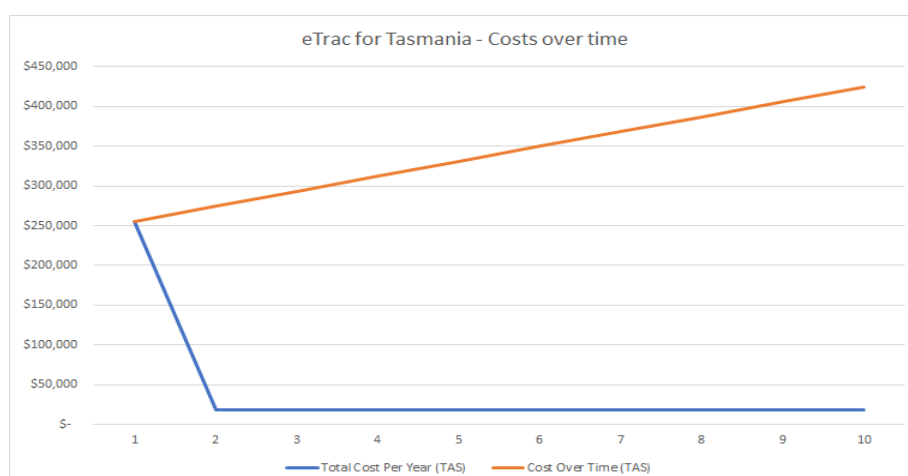


Figure 8 : Notional costs over time for Tasmania (estimated on the basis of forecast inflation).

5.4 Recommendations

- Immediately mandate the adoption of the NSW eTrac system with improvements to ensure that identified loopholes are addressed, and that there is a commitment to continuous improvement.

This system should include a series of mandatory check-in requirements for all greyhounds, as follows:

- 6 months for pre-racing greyhounds;
 - 6 months for racing greyhounds; and
 - 12 months for retired greyhounds.
- Introduce appropriate changes to existing legislation and regulations in order to further strengthen governance and animal welfare outcomes of the eTrac system.
 - Require Tasracing to allocate appropriate funding for these measures from within its current government appropriation.

6 Rehabilitation and Rehoming

6.1 Need for socialising racing greyhounds

There is a strong community perception that greyhounds are incompatible with the average family. This notion is false - it is simply a case of animals being treated as property with little care given to the process of transitioning from being a racing commodity to being a family member.

While greyhounds do make great pets, most require a significant rehabilitation effort before being suited to life as a companion animal. And the better socialised a dog is, the better its chances of making it as a pet.

As with any young dog, socialisation of young greyhounds is important to their future development. However, in relation to greyhounds it is critical. Veterinarians with particular expertise in greyhound behaviour consider that proper socialisation can be the difference between a greyhound being put down and being rehomed. (McHugh, 2016, cited in Durkin, 2017.)

Greyhounds must be socialised sufficiently so as to ensure the animals can be rehomed once they have left the industry. The critical socialisation period lies between 3 to 17 weeks, as the greyhound's experiences within this period will largely influence their behaviour throughout life (MacSporran, 2015).

As with animal welfare, the issue of greyhound racing is regulated on a state level. There exists no national regulatory body and thus accountability, transparency, and enforcement vary vastly across Australia (Chang et al, 2022).

The community does not consider it acceptable for racing greyhound to be euthanised out of mere convenience once it reaches the end of its racing career. The enforcement of minimum socialisation and health requirements will aid the rehoming process as community perceptions around greyhounds adapt.

The industry must accept responsibility for ensuring they are able to financially and logistically sustain the humane and ethical retirement of the volume of dogs that are processed through the industry. This will necessitate significant investment in rehabilitation and rehoming processes, both by the racing industry and by the owners themselves.

6.2 About GAPs

There are a range of rehoming programs designed to enable ex-racing dogs to successfully make the transition from racing to companion animal.

Adoption programs are run by the industry racing body in each state. There are also a number of programs run by not-for-profit animal welfare groups such as the RSPCA.

Most greyhound adoption programs are referred to as GAPs (Greyhound Adoption Program) in most states, including Tasmania. The NSW industry rehoming scheme is known as Greyhounds as Pets (also called GAP for short), as is that in Western Australia. Nationally, these industry rehoming programs receive millions of dollars from the racing body. In contrast, community-based GAPs generally rely on fundraising activities to support their activities.

Very few other industries exist where the 'disposal' of their product is dependent on not-for-profits, as is consistently seen with community organisations rehoming more greyhounds than GAP. An industry that receives such vast quantities of government funding must be expected to meet, and held against, the high standards of animal welfare that make up the contemporary Australian market.

Disturbing trends in some states show racing dog owners are directly disposing of greyhounds to third parties, while some owners are disposing of greyhounds to labs for experiments. Some industry GAPs still put down dogs given to them for rehoming - some as many as one in ten ex-racers. However, community-run rescues rehome without euthanising greyhounds unless they are terminally ill.

6.3 GAP rehoming performance

The current rate of annual greyhound breeding nationally is six times the capacity to rehome. (Coalition for the Protection of Greyhounds, 2023).

As the industry ramps breeding levels, community-based rehoming services are being left to shoulder the burden of dealing with the industry’s “wastage”.

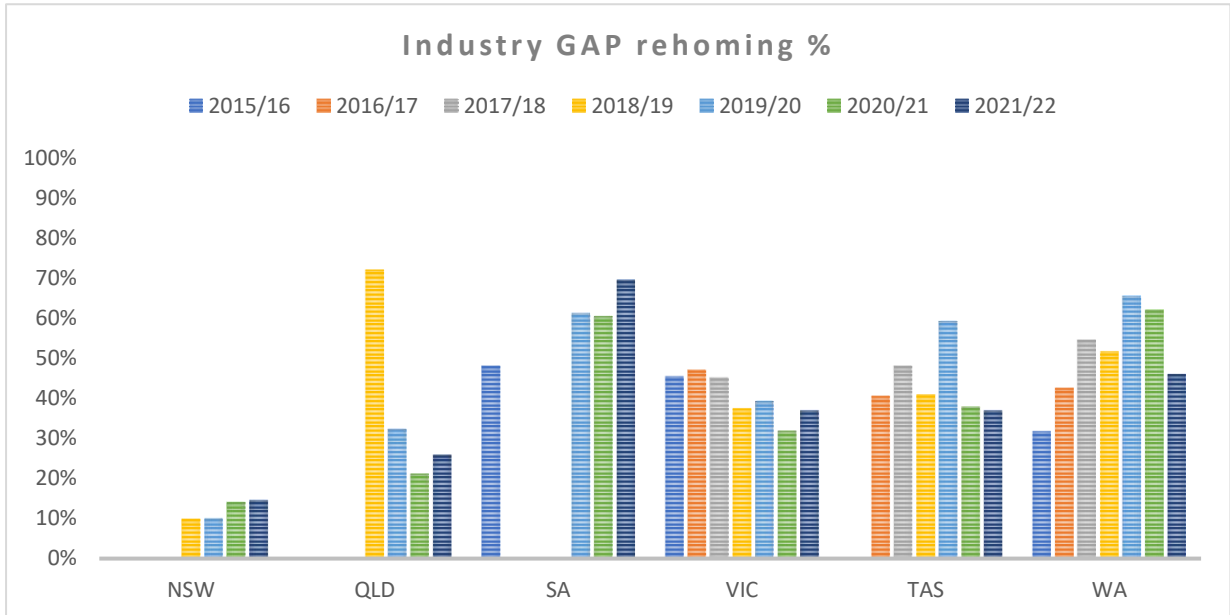


Figure 9: GAP rehoming as % of total rehoming (Coalition for the Protection of Greyhounds, 2023)

In the biggest racing states of NSW and Victoria, community-based rescues continue to rehome more dogs than the cashed-up racing industry programs. GAP WA has been rehoming slightly more than the community programs for several years.

The situation in Tasmania is to some extent masked by the fact that accreditation of community-based rehoming programs was relatively late in starting (2016). Tasracing has not supported the expansion of these programs, and there are still only a few accredited community-based rehoming programs. These are the RSPCA, Dogs Homes of Tasmania, Brightside, and Illoura Sanctuary.

Little information is available about the programs in SA and the NT.

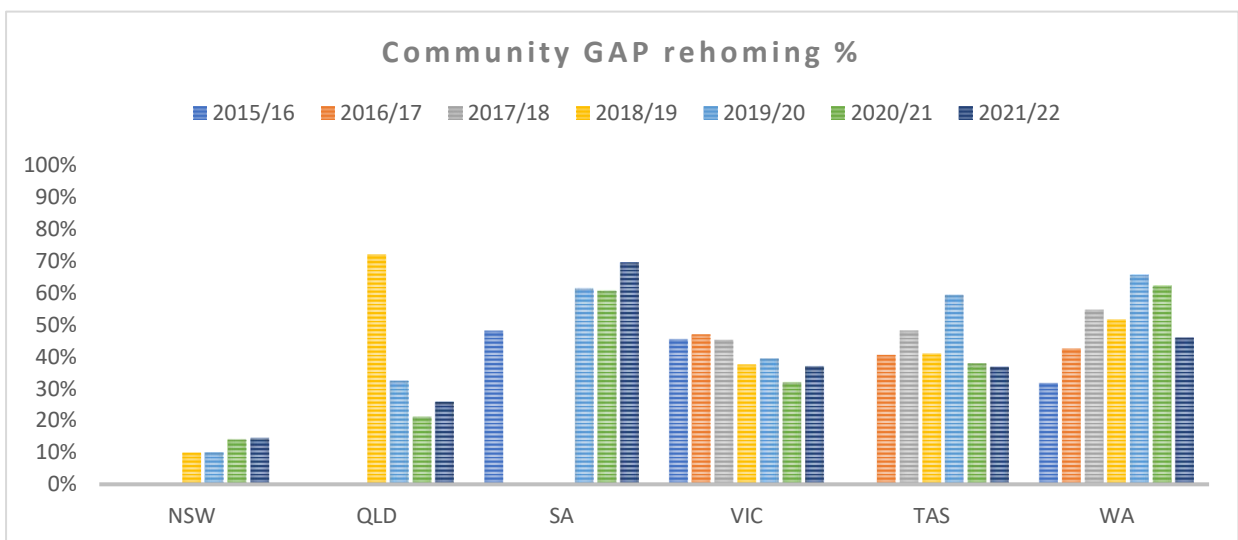


Figure 10: Community rehoming as % of total rehoming (Coalition for the Protection of Greyhounds, 2023)

Some owners take responsibility for rehoming their retired dogs themselves. Data as to this cohort is not available in all states.

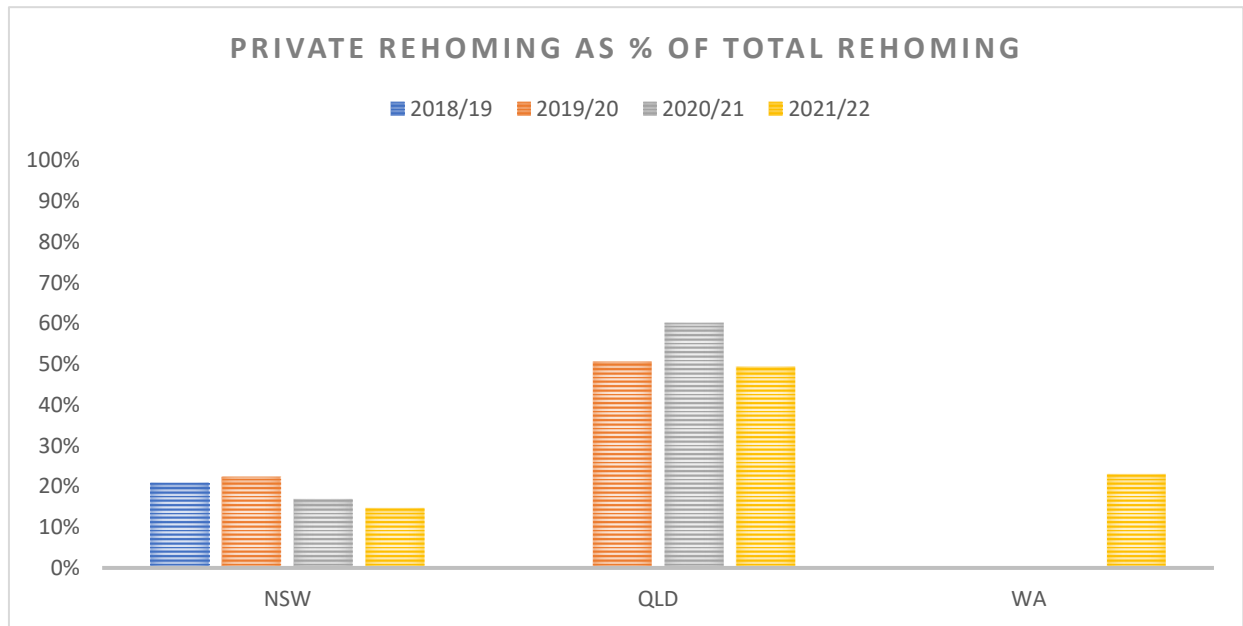


Figure 11: Private rehoming as % of total rehoming (Coalition for the Protection of Greyhounds, 2023)

6.4 Costs of rehoming and rehabilitation

There are significant variations in the cost of rehabilitating rehoming racing greyhounds across the state GAPs, as can be seen below:

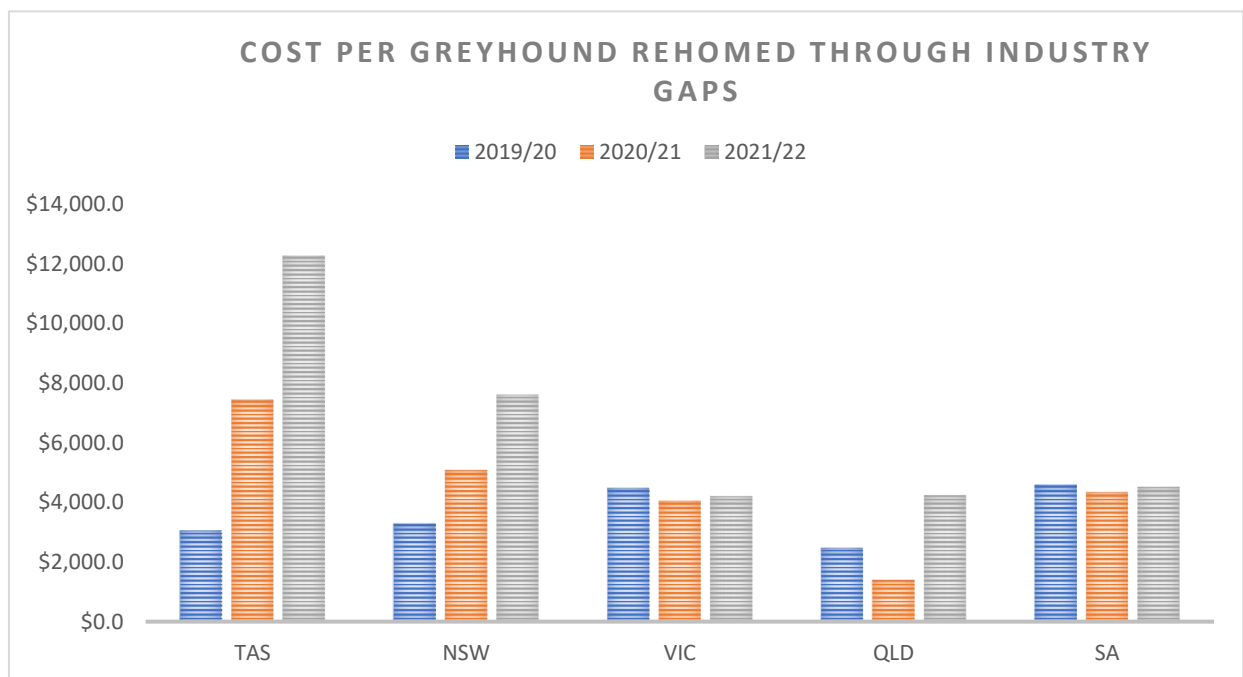


Figure 12: Rehoming costs for industry GAPs¹

This data shows that the expenditure for each greyhound graduated from the Tasmanian industry GAP is far greater than that in any other state.

¹ This data was sourced from Coalition for Protection of Greyhounds 2023, with the exclusion of Tasmania where the data has been sourced from an RTI.

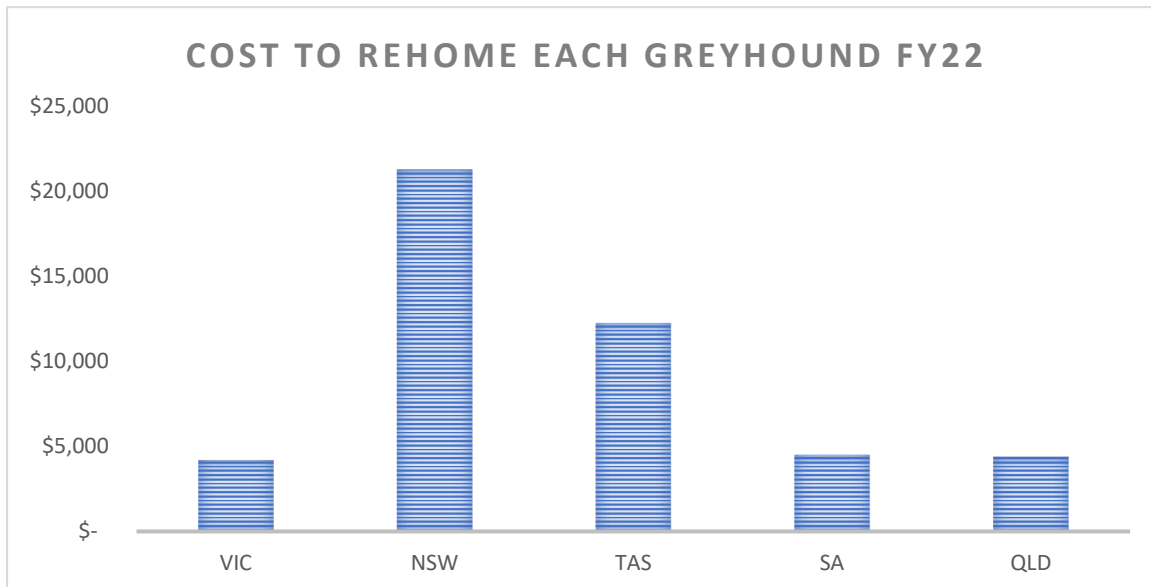


Figure 13: Rehoming costs for industry GAPs²

More detailed information for each state can be found in Appendix B.

6.5 The Tasmanian situation

The Tasmanian industry’s Greyhound Adoption Program (GAP) has been bedevilled by problems over recent years.

These have included accusations that the very close ties between industry and the Tasracing GAP have impacted on the way in which the program operates. The appointment of a well-known greyhound owner and trainer as manager of the GAP heightened concerns about cronyism and lack of independence. That manager was accused of doping dogs and left the role, only to be re-appointed several years later.

If the program is to have any credibility, it must be seen to be totally independent and impartial, and run at arm’s length from the industry.

Other concerns have included the very low numbers of dogs rehomed through the program, and the unusually high operational costs of the program. Confusing – or even misleading – messaging about holding periods and euthanasia policies have added fuel to this fire.

The fact that reporting is limited to a brief overview in Tasracing’s annual report highlights a lack of transparency which exacerbates community concerns about what is actually happening to greyhounds that are no longer racing.

The vast majority of rehoming in Tasmania is performed by community organisations as opposed to those rehomed through the industry’s Greyhound Adoption Program (GAP). Further, there is a general downward trend in the number of greyhounds rehomed by industry. This industry is unable to adequately ‘dispose’ of greyhounds once they can no longer race, and thus the burden of this has been placed upon community-based programs and the Tasmanian community.

² This data was sourced from Coalition for Protection of Greyhounds 2023, with the exclusion of Tasmania where the data has been sourced from an RTI.

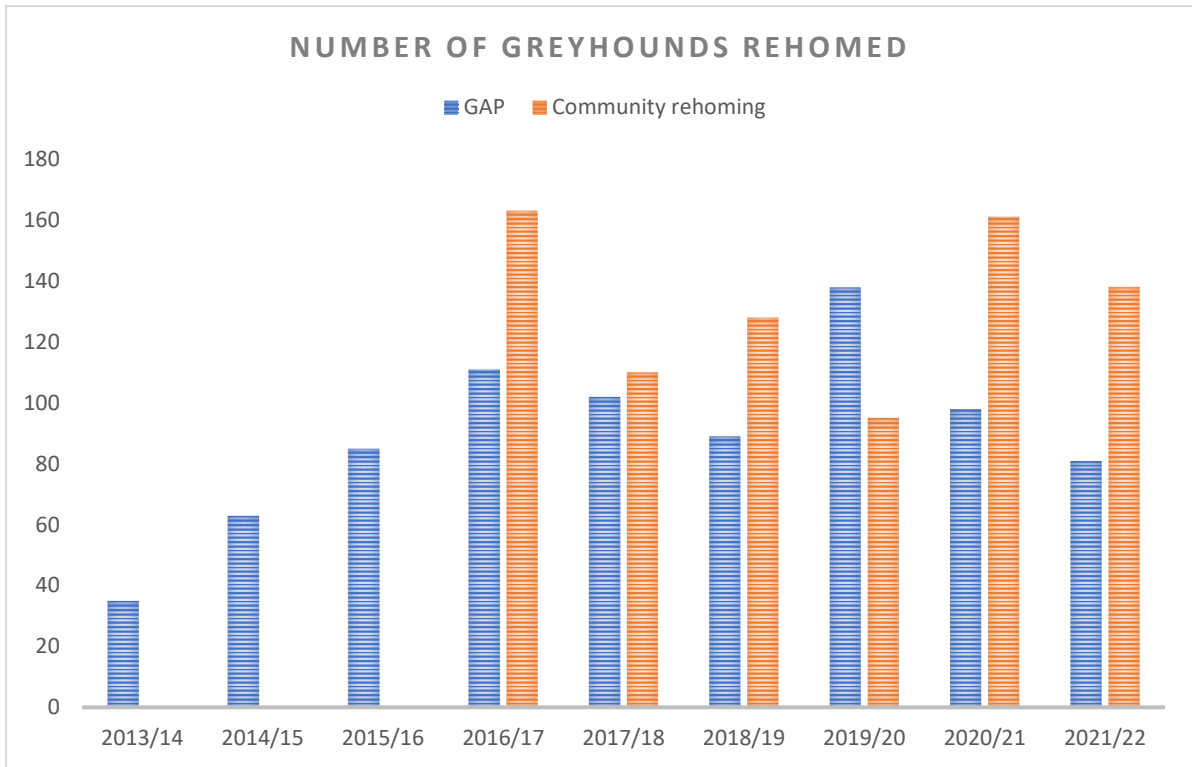


Figure 14: Number of greyhounds rehomed in Tasmania (Coalition for the Protection of Greyhounds, 2023)

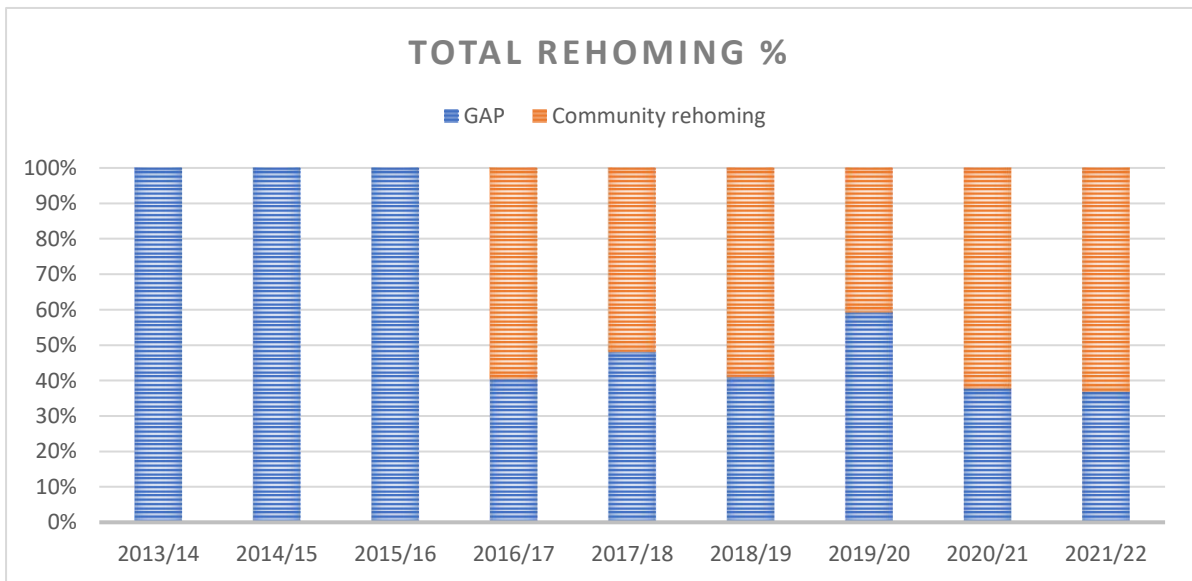


Figure 15: Rehoming activity of GAP programs in Tasmania (Coalition for the Protection of Greyhounds, 2023)

This imbalance is of particular concern in Tasmania, where community-based rehoming programs are all run by not-for-profit charitable groups.

In other states, funding is provided by the peak racing bodies to assist in the rehabilitation and rehoming of greyhounds regardless of which pathway to rehoming they follow. In other words, funding follows the greyhound, not the program through which provides rehabilitation and rehoming services.

It does not seem fair to limit or even refuse a greyhound access to rehabilitation and rehoming services unless it participates in the industry GAP. This is an even more serious issue, recognising the very low numbers of greyhounds that the industry GAP successfully graduates.

No funding is available to facilitate rehabilitation and rehoming services provided by the community-based rehoming programs. As these are all run by not-for-profit charitable groups, this means that the organisation must rely on donations and other fundraising activities to cover the costs of their involvement.

This is placing an unsustainable burden on the community-based programs – and on those who financially support their activities.

The RSPCA’s experience as a service provider has confirmed that the cost to bring each greyhound to the point where it is adoptable is around \$3000. This is roughly in line with the national average shown in Figure 13.

Every dollar the RSPCA (and other community-based programs) spends on greyhound rehoming and rehabilitation activities is a dollar that is diverted from other welfare programs.

The industry should be held responsible for managing its own ‘wastage’. Expecting others to cover the costs of their hobby when greyhounds are not able to race is unacceptable.

This inequity has been raised repeatedly with government. Three separate Ministers for Racing have publicly committed to bringing in a process where every greyhound has access to funding from the industry to support rehabilitation and rehoming services. However, despite the obvious need and the clear equity arguments, nothing has yet changed.

The fact that the performance of the Tasmanian industry GAP is questionable by any measure simply highlights the need for a thorough review. This is demonstrated by the data in Figure 13, which shows that the cost of rehabilitation and rehoming services in Tasmania far outstrips the national average.

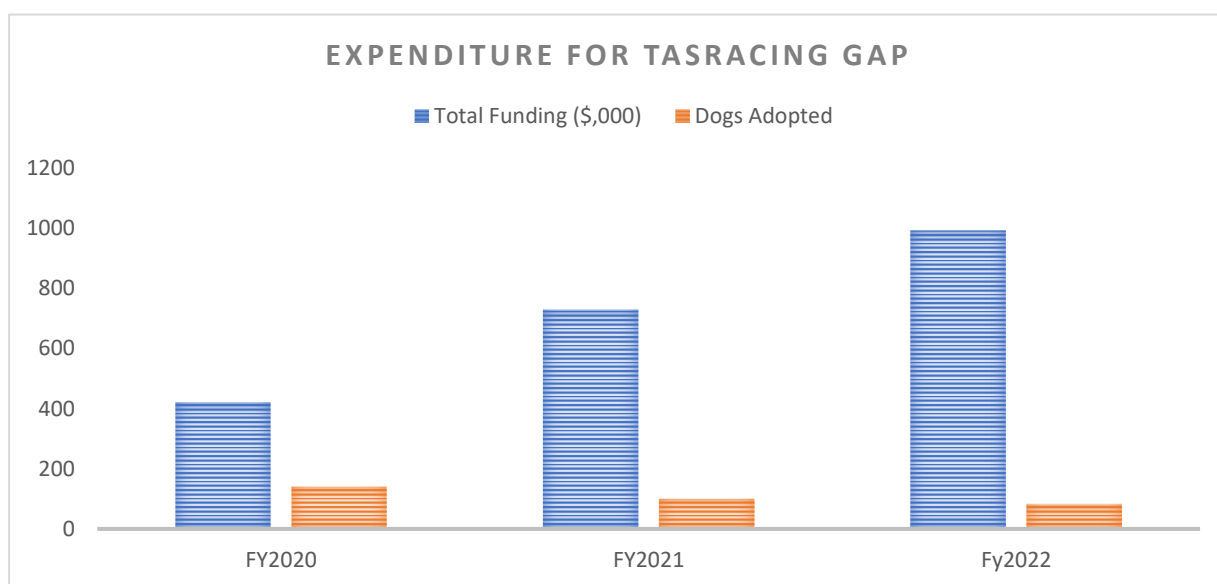


Figure 16: Expenditure for Tasracing GAP (Tasracing Annual Reports)

Breaking this down further, it can be seen that the cost of the program is increasing each year, while at the same time the number of dogs graduating from the program falls.

As noted previously, the cost of rehabilitation and rehoming services provided by the Tasmanian industry GAP far exceeds national averages.

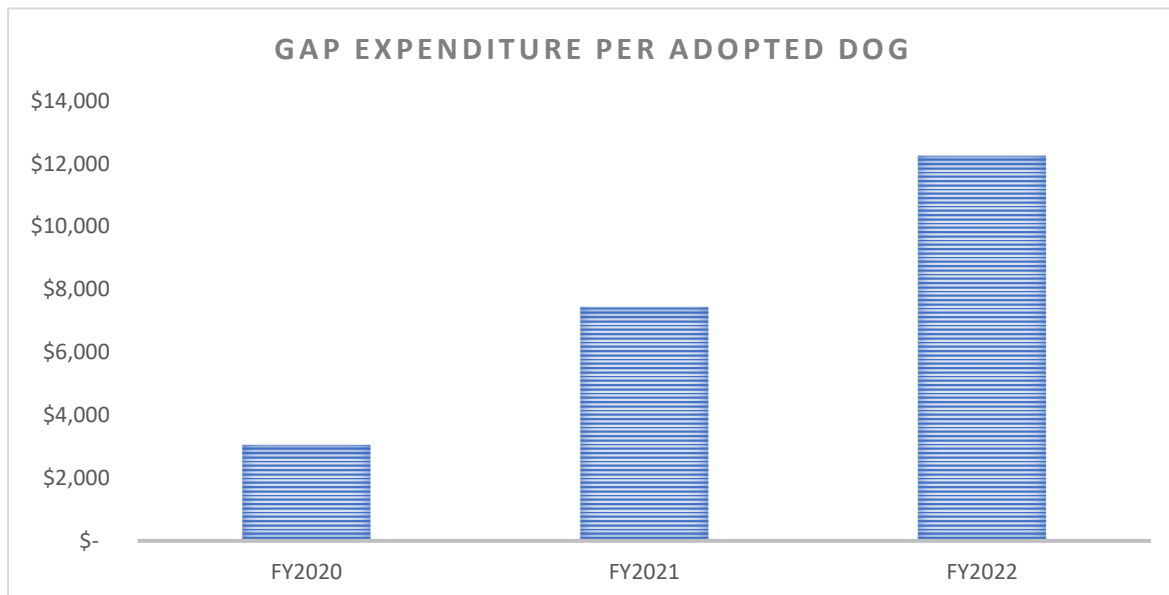


Figure 17: Expenditure per adopted dog for Tasracing GAP (Tasracing Annual Reports)

This apparent anomaly reinforces the need to implement the recommendations of the Joint Select Committee in their 2016 report on Greyhound Racing in Tasmania, specifically:

Recommendation 15: That the Government commission an independent review of the Greyhound Adoption Program and other adoption services. This review is to include examination of existing funding and resources for greyhound rehoming/adoption programs as well as investigating additional mechanisms to support such programs with a view to increasing the number of greyhounds rehomed.

6.6 Options for increasing funding for rehabilitation and rehoming services

There are a number of options that could result in increased funding for rehabilitation and rehoming services. However, in considering possible pathways, it will be important to take into consideration the attitude of industry participants to any increased costs.

“... I put a greyhound into the adoption program and it cost me \$250. I said it cost me \$60 to have it put down. If I had eight dogs it would've been \$2,000 compared to \$500. So people make those decisions because of the cost, and that is the big driver with all this at the end of the day...

... if you've got a half a dozen of them and all of a sudden they're not winning and they're not doing anything and they're costing you 50 bucks a week, a hundred bucks a week, you go, “I better get rid of those two. I'll try to get those two good ones.” (McHugh, 2016b, p.189)

This response highlights the need for increasing awareness of the importance of animal welfare amongst racing industry participants.

The 2016 Joint Select Committee report on Greyhound Racing in Tasmania recognised this in their recommendations, suggesting that mandatory education and training on contemporary animal welfare standards and the provisions of the *Animal Welfare Act 1993* be required for all licensed participants within the greyhound industry.

The obvious way to ensure adequate resourcing for rehabilitation and rehoming services is for the government to mandate this as part of its annual funding allocation to Tasracing.

This would be a good first step towards implementation of Recommendation 26 of the 2016 Joint Select Committee Report, namely that continued government funding of the greyhound racing industry be conditional on upholding contemporary animal welfare outcomes.

Consideration could also be given to additional options that are in place in other jurisdictions, in tandem with this requirement.

One option would be to direct a defined percentage of winnings to rehabilitation and rehoming services for each individual greyhound.

A fee can be collected from the winnings of each dog at a percentage set by ORI (or its successor organisation). This can then be hypothecated to the individual greyhound to ensure that the accumulated funds are adequate upon the dog's retirement.

Alternatively, a percentage of all winnings could be directed to a pooled fund which is only to be used for the retirement and welfare of greyhounds. Individual greyhounds could then access the pooled fund to cover the costs of rehabilitation and rehoming services.

Another solution would be to incorporate an appropriate amount for rehabilitation and rehoming services into the purchase price of each greyhound. When a litter is born, the owner would have to register the greyhound and pay a registration fee that includes the cost of eventually having the dog enter a GAP Program. Once this is paid, it must then be set aside with this note on that greyhound's record. A similar program has been implemented into Great Britain.

A potential means of incentivising industry participants to ensure the future welfare of their greyhounds post-racing is to increase the registration fee and provide a refund upon satisfaction of ensuring the future welfare of the greyhound (Lord Donoghue, 2007). However, Commissioner Alan MacSporran of the Queensland Racing Industry Commission of Inquiry expressed reservations as to the utility of this approach whilst agreeing with the fundamental notion:

"Although this proposal could be viewed as a blunt tool, it may be the only means by which an entrenched culture within the industry can be changed in the short term" (MacSporran, 2015, p.45).

However, MacSporran suggested that the same result may be possible through amending the applicable rules to ensure that the owner is legally required to be responsible for the cost of ensuring a greyhound is provided suitable future arrangements, including via rehoming. (MacSporran, 2015).

There is a pressing need for the industry to recognise the costs of rehabilitation and rehoming services, and take proactive steps to ensure that every greyhound will have access to the necessary resources to ensure their quality of life once they have left the industry.

Options to achieve this outcome should be investigated as a priority by the new TasRIC.

6.7 Recommendations

- Recognising the serious oversupply issues in the industry, require applications for breeding, with the number of breeding applications allowed each year restricted in proportion to the rehoming capacity of the industry.
- Amend the *Animal Welfare Act 1993 (Tas)* to expand the definition of abandonment to explicitly require the rehoming of greyhounds.
- Immediately implement Recommendation 18 of the 2016 Joint Select Committee report on Greyhound Racing in Tasmania, namely that mandatory education and training on contemporary animal welfare standards and the provisions of the *Animal Welfare Act 1993* be required for all licensed participants within the greyhound industry.
- Immediately implement Recommendation 15 of the 2016 Joint Select Committee report on Greyhound Racing in Tasmania, namely that the Government commission an independent review of the (Tasracing) Greyhound Adoption Program and other adoption services. This review is to include examination of existing funding and resources for greyhound rehoming/adoption programs as well as investigating additional mechanisms to support such programs with a view to increasing the number of greyhounds rehomed.
- Ensure all accredited greyhound adoption providers are equally and adequately funded to rehabilitate and rehome retiring greyhounds and greyhounds deemed unsuitable for racing.
- Task TasRIC with developing a scheme to ensure that every greyhound will have access to the necessary resources to ensure their quality of life once they have left the industry.

7 Other Measures

7.1 Demonstrate commitment to change

There have been a number of reviews of the Tasmanian racing industry in the past decade.

These include:

- Joint Select Committee on Greyhound Racing Inquiry (2016);
- Monteith Review (2022);
- Legislative Council Short Inquiry into the role and functions of the Office of Racing Integrity (2023);
- Murrihy Report (2024); and
- Sykes Review (2024).

The Joint Select Committee Report into Greyhound Racing (2016) made thirty one recommendations. Some of these have been implemented in full (eg lifetime bans for anyone found guilty of live baiting, separation between the Office of Racing Integrity and Tasracing); some have been partly implemented (eg information is collected for reporting on injuries sustained during trialing and racing – but this is not readily accessible to the general public). In some cases, it is difficult to ascertain what, if any, progress has been made towards implementing recommendations, as there is little or no public reporting. However, a number have either not been addressed at all or rejected outright by the industry (eg supporting the “Towards Zero Euthanasia” framework)

Relevant recommendations include:

- That the Tasmanian Government in consultation with Tasracing, the Office of Racing Integrity, the RSPCA and other interested parties provides annual updates of progress on the recommendations made by the Committee.
- That the Government support the Office of Racing Integrity and Tasracing’s stated commitment to Greyhounds Australasia’s “Towards Zero Euthanasia” framework and to actively monitor progress towards this goal.
- That the Office of Racing Integrity develop and maintain a comprehensive database to enable all greyhounds whelped in Tasmania, or imported, for the racing industry to be tracked at all stages of life.
- That the Government implement, as a matter of priority, Recommendation 19 of the Review Report ie creation of a rule of racing that at all times (from whelping onwards) a greyhound must be in the possession of, and under the ownership, care and control of a licensed person.
- That the Office of Racing Integrity undertake a review of the standards, guidelines and policies in place for the housing and rearing of greyhounds to consider how best welfare practice requirements can be improved and enforced.
- That Tasracing and the Office of Racing Integrity investigate the reasons for injuries and if the design and/or condition of the track is identified as a contributing factor, improvements must be undertaken to the track.
- That the Office of Racing Integrity undertake a review to ensure the penalties imposed for the use of prohibited substances reflect the seriousness of the offence.
- That the Minister for Racing require the Office of Racing Integrity to review and report on the number of litters bred in Tasmania, five years from the introduction of the new breeding rules, to determine whether the breeding rules have reduced wastage rates.
- That the Government commission an independent review of the Greyhound Adoption Program and other adoption services. This review is to include examination of existing funding and resources for greyhound rehoming/adoption programs as well as investigating additional mechanisms to support such programs with a view to increasing the number of greyhounds rehomed.

- That the Office of Racing Integrity be appropriately resourced in order to increase inspections of properties and strengthen its capacity to undertake effective routine swabbing.
- That the Government further investigate whether provisions regarding mental suffering should be incorporated in the Animal Welfare Act 1993.
- That mandatory education and training on contemporary animal welfare standards and the provisions of the Animal Welfare Act 1993 be required for all licensed participants within the greyhound industry.
- That the Minister for Racing require the Office of Racing Integrity and Tasracing to review and report on the new grading schedule annually to determine whether it is reducing wastage rates.
- That the Government require Tasracing and the Office of Racing Integrity to reach an agreed position on rules affecting animal welfare standards. This position be presented to Greyhounds Australasia with the aim of achieving best practice in animal welfare through consistent application and improvement of national standards.
- That the Government undertake an independent cost-benefit analysis of the Tasmanian racing codes to inform a review of the current funding model for the racing industry. Recommendation 26: That continued government funding of the greyhound racing industry be conditional on upholding contemporary animal welfare outcomes.
- That the Minister for Racing instigate a review of existing penalties and appeal provisions to determine whether changes should be introduced, particularly pertaining to issues of animal welfare.
- That the Government establish standards and identify benchmarks for improving animal welfare outcomes to be reported in Tasracing's annual report.

Eight years have now elapsed since these recommendations were made. The fact that progress on so many of the recommendations has apparently been glacial does not instill confidence in the commitment of the industry – or the government – to improving performance, especially as it relates to animal welfare.

Had many of these recommendations been implemented, then issues that resulted in later reviews may not have arisen, or at least may not have been as serious. There is little point in repeated reviews and inquiries, if the recommendations are left gathering dust on shelves.

If the government is serious about improving welfare outcomes for racing animals in Tasmania, it must commit to immediate and complete implementation all outstanding recommendations of these reviews and reports.

Importantly, it must also commit to open and transparent accountability about progress or, if appropriate, why circumstances have changed.

Such a commitment would send a clear message to the industry about the need for reform. It would also show the wider community that their concerns are being heard.

7.2 Review relevant state legislation and regulations

The *Animal Welfare Act (1993)* is long overdue for a comprehensive rewrite. Some minor changes have been made since the legislation was introduced more than thirty years ago. However, there is a need for clean-sheet replacement legislation that will ensure our laws reflect both contemporary community expectations and best practice, and set the scene for the next two decades of animal welfare regulation.

This is particularly relevant if improved welfare outcomes for racing greyhounds are to be achieved.

A number of issues which have been identified in previous reports and inquiries would be addressed by the implementation of a lifecycle traceability system, as recommended in this report. These would include, among other things, overbreeding, post-racing traceability, euthanasia.

However, there are a number of broader issues that need to be addressed, including:

- There are no actual standards regarding appropriate conditions for keeping dogs in any of the state's welfare legislation or regulations. The *Animal Welfare Act* simply states that animals must be given adequate food and appropriate shelter. This lack of clarity makes enforcement of even basic care standards problematic.
- Creation of an Animal Welfare Offenders Register that is a publicly available list of all persons convicted of an animal welfare offence under the Act. This is to create greater awareness of those convicted under the act and to ensure that animals are not rehomed to convicted individuals. Whilst this is of vital importance to the greyhound industry given the vast number of greyhounds that need to be rehomed, it is also of benefit to other animals across Tasmania.
- Contemporary animal welfare legislation now includes provisions recognising sentience of animals. Whilst the Act does recognise mental suffering, the provisions are vague and open to interpretation. There needs to be a community discussion about how sentience is to be recognised in animal welfare regulations and legislation.

A review of this nature is not going to happen quickly. Realistically, this would be a three year project. At the same time, there is still scope for continuing review and updating of the current Act.

7.3 Review and update the Tasmanian Rules of Racing

The Tasmanian Local Rules of Racing were created by Tasracing. When compared to the rules of other states' racing industries, the Tasmanian Rules of Racing fail to recognise the critical role animal welfare plays in the industry.

Tasmania's Local Rules of Racing do not mention anything related to the welfare of racing animals.

It could appear this responsibility has been relinquished to the National Racing Standards, as Local Rule 3.1 states that *The Local Rules of Tasracing and the Australian Rules of Racing for the time being shall be read, interpreted, and construed together, and as so combined shall be known as "The Tasmanian Rules of Racing"*.

The Australian Racing Rules provide for a host of welfare provisions. However, local rules allow a state the chance to extend and develop the welfare provisions prescribed under these Rules. This then emphasises that animal welfare is considered to be of prime importance in the racing industry.

If the community is to have any confidence in the industry's commitment to improving animal welfare outcomes, the Tasmanian Rules of Racing should be amended to specifically reference this as a priority. Importantly, there needs to be greater clarity as to the specific roles of TasRIC and Tasracing under the proposed new governance framework.

Measures need to be taken to address the current perception that integrity and animal welfare priorities are considered secondary to commercial interests in the industry. The independence of TasRIC as the regulator needs to be more strongly demonstrated, as does the requirement for Tasracing to be transparent and accountable in all aspects of its operation.

An example of Tasmania's failure to provide adequate welfare provisions can be seen in comparing relevant policies between Tasmania and New South Wales.

The *NSW Greyhound Welfare Code of Practice* was created under section 36 of the *Greyhound Racing Act 2017*. It provides mandatory standards for a range of welfare issues related to greyhounds, including:

- Nutrition and hydration – to ensure that every greyhound receives the food and water needed for optimal development, health, and wellbeing.
- Health and wellbeing – to ensure that every greyhound enjoys optimal health and wellbeing.
- Greyhound breeding – to ensure that greyhounds are bred in a safe and responsible manner, resulting in healthy greyhounds and puppies.
- Housing and environment – to ensure that every greyhound is provided with housing that provides adequate space, shelter and comfort, having regard to the greyhound's age, size and behavioural

needs.

- Transportation – to ensure that greyhounds are transported in a safe and secure manner that provides for their wellbeing.
- Exercise, socialisation and enrichment – to ensure that every greyhound is provided with adequate exercise, socialisation and enrichment to provide for its wellbeing.
- Training, trialling and racing – to ensure that the welfare of greyhounds is protected in greyhound training, trialling and racing.
- Rehoming greyhounds as companion animals – to optimise rehoming outcomes for greyhounds that are retired or otherwise unsuitable for racing.

Further, the Commission is able to take disciplinary measures for any breaches of the code, even if the offender is longer registered.

In Tasmania, the only comparable code would be the recommended *Standards for The Care of Greyhounds*. These ‘standards’ are far less extensive than those in NSW. Further, the fact that they are merely ‘recommended’ rather than ‘mandatory’ renders them essentially redundant.

However, even if Tasmania were to adopt an identical set of mandatory codes that replicated those seen in the larger states, these would not be effective without concurrent changes to legislation and regulation, alongside increased resourcing for welfare functions.

7.4 Establish an Animal Welfare Commission

Animal welfare issues are not unique to Tasmania. Different states are dealing with them (or not) in different ways.

The Victorian approach to animal welfare is the most advanced of any Australian jurisdiction. Animal welfare is acknowledged as a key priority for the Victorian state government. In order to deliver improved outcomes, there is a whole of government animal welfare plan. This is overseen by Animal Welfare Victoria, a multi-disciplinary agency.

Victoria's first-ever Animal Welfare Action Plan — Improving the Welfare of Animals in Victoria, was released in 2018. This plan aims for Victoria to continue to improve animal welfare and to be well-respected globally for its animal welfare practices.

The action plan covers all animals including:

- pets;
- livestock;
- native animals;
- aquatic animals;
- animals used for research and teaching; and
- animals used in tourism and recreation (including racing).

The Animal Welfare Action Plan embodies community expectations that animals deserve to be treated with care and respect. The Plan was developed in collaboration with industry and the Victorian community.

It sets four priority areas:

- a policy and legal framework that safeguards and improves animal welfare in Victoria;
- collaboration that advances and promotes investment in animal welfare;
- education and communication that improves attitudes, knowledge, skills and compliance; and
- compliance and enforcement that is efficient and effective.

In the proposed Tasmanian model, this plan should include specific provisions relating to improving welfare outcomes and the implementation of life cycle traceability systems for racing animals,

including greyhounds.

Animal Welfare Victoria brings together all aspects of domestic animal and animal welfare research, policy, education, and compliance. It has responsibility for oversight of the Animal Welfare Plan.

Other responsibilities include:

- animal welfare advisory committee;
- Prevention of Cruelty to Animals Act;
- Domestic Animals Act;
- reforming Victoria's animal care and protection laws;
- Australian animal welfare standards and guidelines;
- livestock management and welfare;
- stray and unwanted animals;
- Victorian pet census;
- animals used in research and teaching;
- community and education;
- cats;
- dogs;
- other pets;
- Victorian Pet Register;
- choosing a pet;
- domestic animal businesses; and
- pets and emergencies.

Whilst Tasracing and the Racing Integrity Commissioner would retain responsibilities for development and implementation of lifecycle tracking systems for all racing animals, the Animal Welfare Commission would monitor the industry's progress and performance in relation to these matters and include reporting on these matters as part of the Animal Welfare Plan.

These initiatives have reinforced the Victorian government's commitment to achieving improved animal welfare outcomes. They have sent a clear signal to government agencies and, importantly, to the general public, that this commitment is more than just words. This whole of government focus has been extremely successful in ensuring existing legislation and regulations are continually updated. It has also delivered initiatives such as the Victorian Pet Register and the state-wide pet census – both of which will provide solid information for continuous improvement going forward.

More information can be accessed here: <https://agriculture.vic.gov.au/livestock-and-animals/animal-welfare-victoria>

7.5 Review local government responsibilities

The requirement for local governments to manage the control of dogs (including greyhounds) in Tasmania is provided for in the *Dog Control Act 2000 (Tas)*. Under this Act, local government is responsible for dog registration and kennel licencing.

However, given the vastly differing level of funding and capacity between municipalities, there is significant inconsistency in how dogs are managed across the state. The issue of primary concern is that greyhounds are leaving the racing industry and being transitioned to the life of a companion animal. As a result, the level of traceability offered differs depending on where they are subsequently registered.

7.5.1 Dog registration

The costs associated with registering a greyhound vary greatly across Tasmania's 29 councils.

However, even the highest registration costs do not generate sufficient income for councils to be able to adequately fulfill their legislative responsibilities – in general, but specifically for greyhounds.



Figure 18: Cost of registering greyhounds (Department of Premier and Cabinet, 2023)
 (Note: not all councils have a specific registration fee for greyhounds)

In order to comply with the *Dog Control Act 2000* and the *Dog Control Regulations 2010*, all dogs over the age of 6 months must be registered. Each dog must be issued with a unique council registration tag which must be attached to the dog's collar. Under the Act, council General Managers must maintain a register that includes detailed information about each dog. The Act also requires all dog owners to provide an update to council whenever a new dog aged over 6 months comes to live (or ceases to live) at the property. This report must include sufficient details of each individual dog to meet the registration requirements as outlined above.

However, it is clear that some councils fail to comply with the letter of the law when it comes to facilities which have large numbers of dogs. For example, some councils simply issue a number of tags to facilities but do not keep the records legally required. In some cases, councils rarely (if ever) reconcile the issued tags with an on-ground check. There are examples that confirm this is equally true for puppy farms and greyhound facilities.

7.5.2 Kennel licencing

Councils are also responsible for issuing and policing kennel licences. All properties with three or more dogs are required to have a kennel licence. This is a challenging and resource-intensive task for most councils and it is often the case that it is not accorded a high priority.

An added complication is the fact that there are no actual standards regarding appropriate conditions for keeping dogs in any of the state's welfare legislation or regulations. The *Animal Welfare Act* simply states that animals must be given adequate food and appropriate shelter. This lack of clarity makes enforcement of even basic care standards problematic.

This is a legislative deficiency which must be addressed if welfare outcomes for greyhounds (or other animals) are to be improved.

7.5.3 Data management

Data management and record keeping are hugely variant across councils. This makes it difficult, if not impossible, to track greyhounds accurately at any stage of their lifecycle.

At one end of the scale, Devonport City Council has a very sophisticated on-line database that is easily updated and readily accessible. At the other end, some councils have very basic systems which are little more than manually maintained Excel spreadsheets.

Implementation of a contemporary state-wide web-based platform for managing dog registrations and kennel licencing should be a priority. This could be based on the system used by Devonport City Council. As per the example of the Victorian Pet Register, this could be expanded to include all dogs and, eventually, cats.

In order to maximise transparency and traceability, this platform should interface with the eTrac system.

7.6 Recommendations

- Commit to immediate and complete implementation all outstanding recommendations of previous reviews and reports.
- During its current term of office, commit to development of a clean-sheet replacement Animal Welfare Act that will ensure our laws reflect both contemporary community expectations and best practice, and set the scene for the next two decades of animal welfare regulation. At the same time, maintain a program of review and amendment of the current Act.
- As a matter of urgency, require TasRacing to:
 - review and update the Tasmanian Rules of Racing, to ensure animal welfare is accorded the highest priority; and
 - develop and implement a comprehensive Code of Practice for greyhounds.

- During its current term of office, commit to the establishment of a cross agency Animal Welfare Commission based on the Victorian model, and task it with developing an Animal Welfare Plan.

This plan should include specific provisions relating to improving welfare outcomes and the implementation of life cycle traceability systems for racing animals, including greyhounds.

Whilst Tasracing and the Racing Integrity Commissioner would retain responsibilities for development and implementation of lifecycle tracking systems for all racing animals, the Animal Welfare Commission would monitor the industry's progress and performance in relation to these matters and include reporting on these matters as part of the Animal Welfare Plan.

- In the short term, require the Office of Local Government to work with LGAT as the representative of local councils to develop and implement a new state-wide registration system for racing greyhounds.

Once the Animal Welfare Commission is established, responsibility for management of dog registrations and kennel licencing (including those for greyhounds) should be shifted from councils to the new body.

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Industry Governance

The *Greyhound Racing Act 2009 (NSW)* created Greyhound Racing New South Wales (GRNSW) as the body responsible for greyhound racing within NSW. Until 2015, GRNSW controlled both the commercial and regulatory aspects of the industry.

However, the *Greyhound Racing Act 2017 (NSW)* separated and assigned the responsibilities of commercial and regulatory control to GRNSW and the Greyhound Welfare and Integrity Commission (GWIC) respectively. This separation of functions was discussed at length within the 2016 McHugh report and Tasmania was used as an example of the model's feasibility.

Under this legislation, GWIC is required to maintain a register for all greyhounds within NSW from the age of twelve weeks. The legislation also confirmed mandatory and comprehensive regulations surrounding the breeding/whelping, trialling, training, racing, retirement, and rehoming of NSW greyhounds. There were also partial regulations surrounding rearing and education.

Data reporting

The robustness of NSW greyhound traceability can be attributed to legislative enforcement of these requirements, including mandatory notifications that must be reported to GWIC for a change in activities and location for any racing greyhound. Further, there are reporting requirements under the NSW Rules of Racing for transferring ownership, death and euthanasia.

In 2020, GWIC developed the Greyhound Register Reconciliation Program which verified historical data. GWIC also created a Tracking of Registered Greyhounds (ToRG) program that allows the monitoring of greyhounds and their status. This program has a risk-based approach that focuses on key periods in a greyhound's lifetime.

However, the ability of GWIC to provide lifetime traceability ends upon retirement to a non-industry participant or if the greyhound is not registered with the Greyhound Register at all. There is a current investigation of the logistics of expanding this scope.

As required under the rules of racing, self-reported data from participants on racing, euthanasia or rehoming is uploaded to the OzChase database.

The *Greyhound Racing Regulation 2019 (NSW)* requires GWIC to publish the following data:

- the number of participants, registered greyhounds and trial tracks;
- an overview of the injuries suffered during racing;
- an overview of disciplinary action against trial tracks and participants; and
- information regarding Commission inquiries.

GWIC has also included the following data summaries concerning the NSW greyhound population in their 2020 annual report:

- number of dogs within the categories of pre-racing, racing and post-racing;
- litters born;
- mortality of greyhounds;
- exports of NSW greyhounds; and
- wastage rates.

GWIC also provides more detailed breeding and whelping data in the form of:

- monthly breeding service details which include the individual information of each female that has mated with a given male and the date of these instances;
- monthly details for the date of whelping, the number of pups and their sex, the dam and sire, and details of the service type (AI or FSI).

Since 2019, GWIC has published a quarterly report with figures around greyhound retirements and deaths.

However, this data is self-reported and is only partly verified through routine inspections of establishments. The euthanasia data is either reported by veterinarians that access eTrac, or self-reported with certification from the veterinary surgeon as required.

Some of the categories that are reported include:

Retirement:

- retained by trainer or owner;
- rehomed privately by trainer or owner;
- accepted to GAP;
- accepted to third party rehoming organisation; and
- exported.

Euthanasia:

- medical euthanasia that was conducted outside of the track;
- euthanasia that occurred at the track following an injury;
- euthanasia after failed rehoming attempts; and
- euthanasia performed by a veterinarian upon a greyhound that was certified as behaviourally unsuitable for rehoming.

Deaths:

- deaths due to illness;
- deaths due to unknown causes;
- deaths due to natural causes;
- sudden deaths on track; and
- accidental deaths.

Participants are also required to register their intention to breed and to notify GWIC of the outcomes pregnancies. This forward notification means GWIC can follow up if details of litters are not submitted does not arrive.

eTrac

The eTrac system is a new digital portal that delivers world-first technology through a single and secure system with ease of use for all greyhound industry participants. The system includes a mobile app and an integrated support feature for real-time assistance from GWIC staff.

It offers a 'one stop shop' online portal where participants can access their registration and greyhound information, and complete transactions such as vaccination notifications, registration renewals, updating kennel locations, owner/trainer transfers, and view details of greyhounds in their care.

This will enable GWIC to monitor and record the whereabouts of every registered greyhound in New South Wales, ensuring the highest standards of animal welfare, more robust and efficient racing operations, and even greater confidence in the sport.

GWIC states that eTrac will:

- enhance the industry's ability to account for every greyhound registered in NSW;
- provide a better customer experience for participants by making day to day transactions easier to complete;
- streamline processes to improve operational efficiency within the Commission by introducing one system for all industry transactions.

The eTrac program was soft launched in mid-2022 to provide time for industry participants to adjust to the system. All industry participants were required to be registered by November 2023.

More information about the system, and some user experience endorsements, can be found here: <https://www.gwic.nsw.gov.au/welfare/whole-of-life>

Check-ins and contacts

All greyhounds (pre-racing, racing and retired) have to be 'checked-in'/in contact through eTrac on a regular basis. For racing greyhounds, this is once every six months. Pre-racing or retired greyhounds must be checked in once every twelve months.

A 'contact' is defined as when a greyhound's record in eTrac is updated following:

- starting in a NSW or interstate race meeting;
- being scanned at the track for a race or trial;
- a vaccination record;
- breeding application;
- lodgement of a Whelping Notice;
- ear branding or microchipping;
- a scan during a kennel inspection;
- a change in ownership;
- a kennel or trainer transfer;
- a visit to a select group of veterinary practices;
- a retirement notification;
- being scanned at GAP or another rehoming facility;
- naming a greyhound;
- completing a breeding/racing lease; or
- lodgement of a DNA test with Greyhounds Australasia;

Greyhounds can be checked in at a variety of locations across NSW. It is intended that the number of check-in locations will expand over time.

Compliance

Initially, compliance was roughly 40%. This relatively low compliance rate was primarily attributed to the fact that notifications were being sent via email even though many participants did not have or use email accounts. The system was then amended to send all notifications through text, as well as email. This resulted in an increase in compliance to roughly 70%.

If a person fails to check-in their animal following this notification, another notification is sent. If there is still no response, then an inquiry will be launched to follow up. This will result in the majority of these participants (c30%) then checking their dog in, or advising that the dog has been rehomed etc.

If a participant deliberately fails to comply, then this will result in a fine. If this behaviour is repeated, then there can be disciplinary sanctions which result in the participant being disqualified from the industry.

However, whatever the situation, the greyhound must still be accounted for. If a participant is unable to account for a registered greyhound, then an investigation will be launched with disciplinary sanctions.

Appendix B: Industry Rehoming Programs

This section summarises information about the performance of industry based GAPs. Where relevant, details of any subsidies or incentives provided to facilitate rehabilitation and rehoming are also provided.

NSW

Rehoming Performance

The NSW Greyhound Rehoming Policy provides comprehensive mandatory standards that must be followed in the rehoming of greyhounds.

The McHugh 2016 report identified that if all rehoming organisations, both official and third-party, within NSW were to rehome greyhounds at peak efficiency and maximum capacity, then this would still only account for around 18% of the pups whelped.

The only data that is reported on GAP NSW is that which can be sourced from GWIC's quarterly retirement and end of life report.

The data for recent years shows some variation in numbers of dogs being rehomed, with the trend line being generally downwards. The main change is in the number of dogs retained within the industry. When this figure is taken into account with the numbers of dogs rehomed directly by trainers, it is apparent that accurate tracking of these dogs would be difficult, if not impossible.

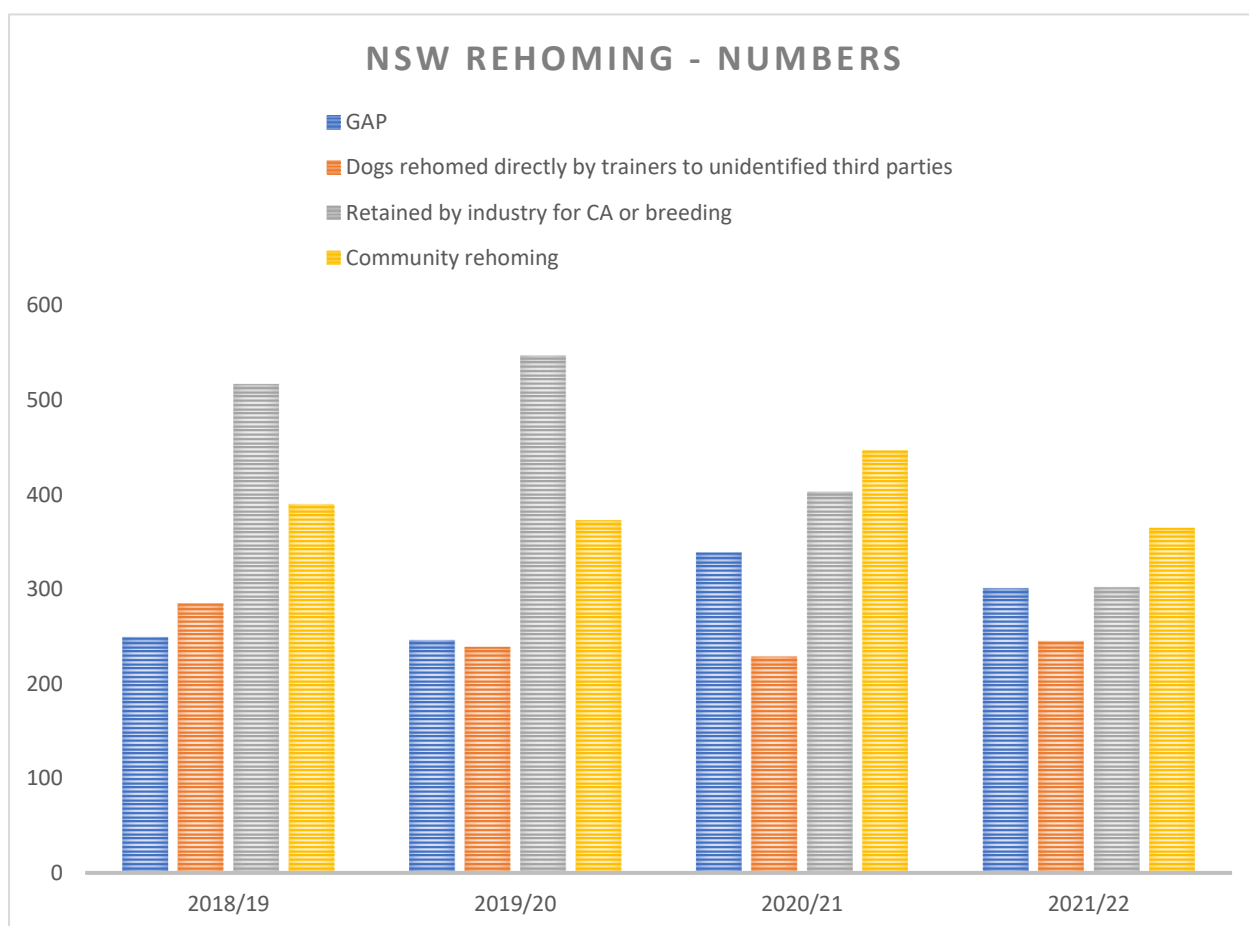


Figure 19: NSW Rehoming Numbers (Coalition for the Protection of Greyhounds, 2023)

Since 2020, the majority of dogs have been rehomed through community-based programs.

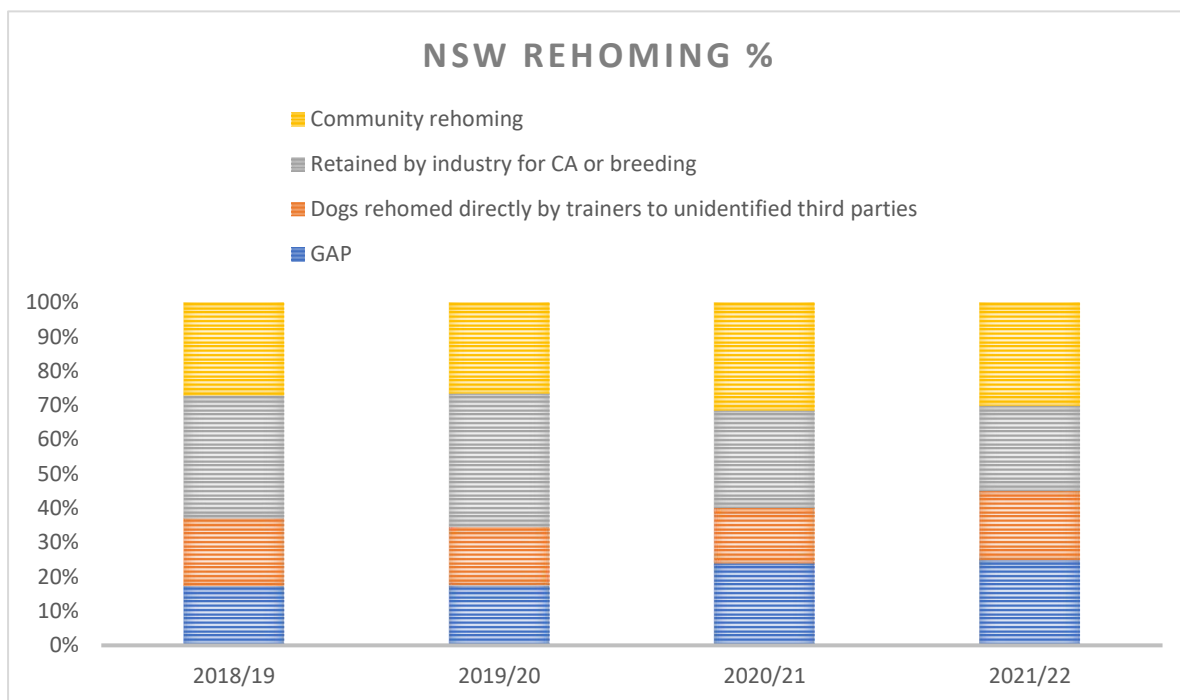


Figure 20: NSW Rehoming % (Coalition for the Protection of Greyhounds, 2023)

In 2023, Greyhound Racing NSW announced a proposal for a 400-capacity kennel project described as a world-first ‘farmstay’ for the retraining and rehoming of greyhounds. The estimated cost has been put at \$30 million (Bernasconi, 2023).

Project planning documents have described the project as “central to the future of Greyhounds NSW and its plans to transform the culture of the greyhound racing industry” (Bernasconi, 2023, no pagination). The facility would allow a permanent residency for greyhounds unable to comply with companion animal standards etc. This would potentially reduce the need for euthanasia in the case of a greyhound being unsuitable for rehoming. The project is currently stalled.

Rehabilitation and rehoming subsidies or incentives

- Homing Assistance Scheme

The scheme provides a rebate for specified veterinary costs to, amongst other eligible applicants, “rehoming organisations who have had un-desexed GWIC registered greyhounds relinquished to them” (Greyhound Racing NSW, 2022b, p. 1).

The funding is primarily targeted to be used for desexing, but it can also be used for a rebate for a veterinary consultation, a booster vaccination (c5 of full c7 course), minor dental work, and a heartworm SNAP test (or other equivalent) including a heartworm treatment/preventative.

The reimbursement is achieved through the rehoming organisation paying the veterinarian and then providing an invoice receipt to GRNSW who will then provide a rebate given that the services provided are eligible. The total amount payable for any undesexed greyhound under the age of seven is \$850, and \$950 for dogs over the age of seven.

- Greyhound Rehoming Organisation Grant Scheme

This Rehoming Grant Scheme provides limited financial assistance to eligible greyhound rehoming organisations (Greyhound Racing NSW, 2021). The Scheme provides eligible organisations with up to \$10,000 towards the cost of a service or an item that directly benefits their rehoming activities of greyhounds registered with GWIC. The grant is only available to charities or not-for-profit organisations.

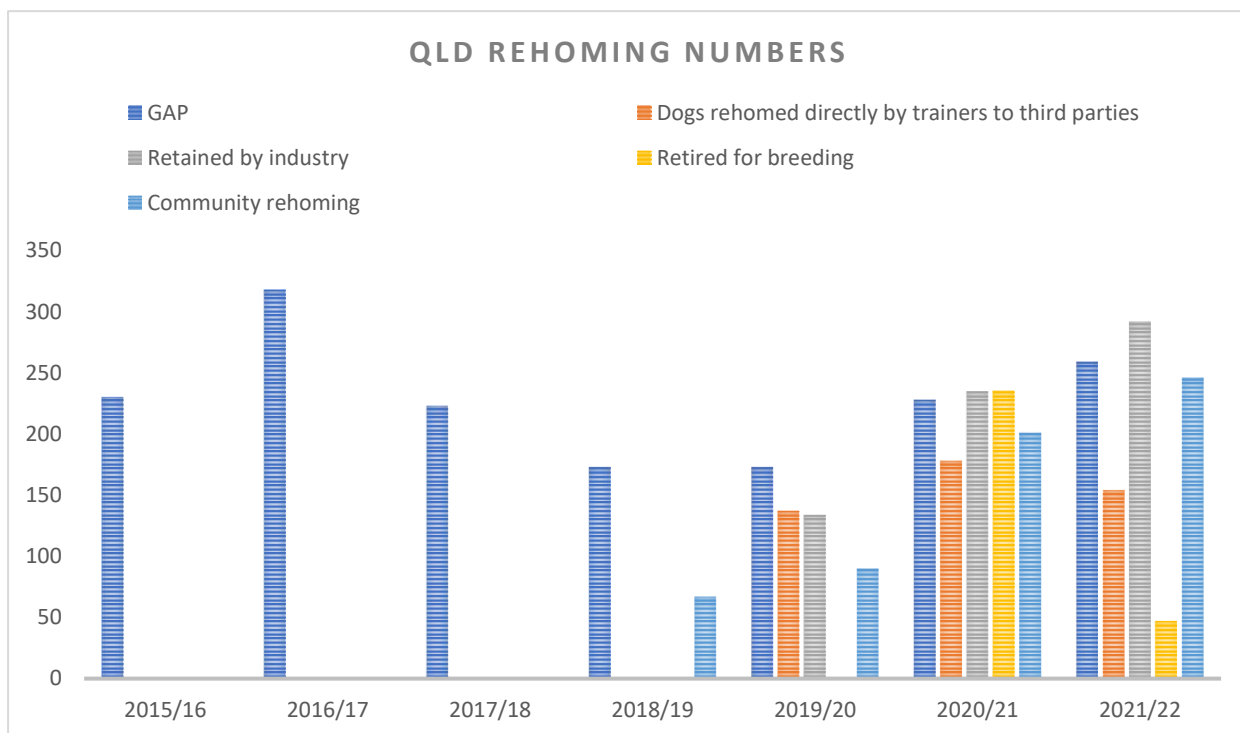


Figure 21: QLD Rehoming Numbers (Coalition for the Protection of Greyhounds, 2023)

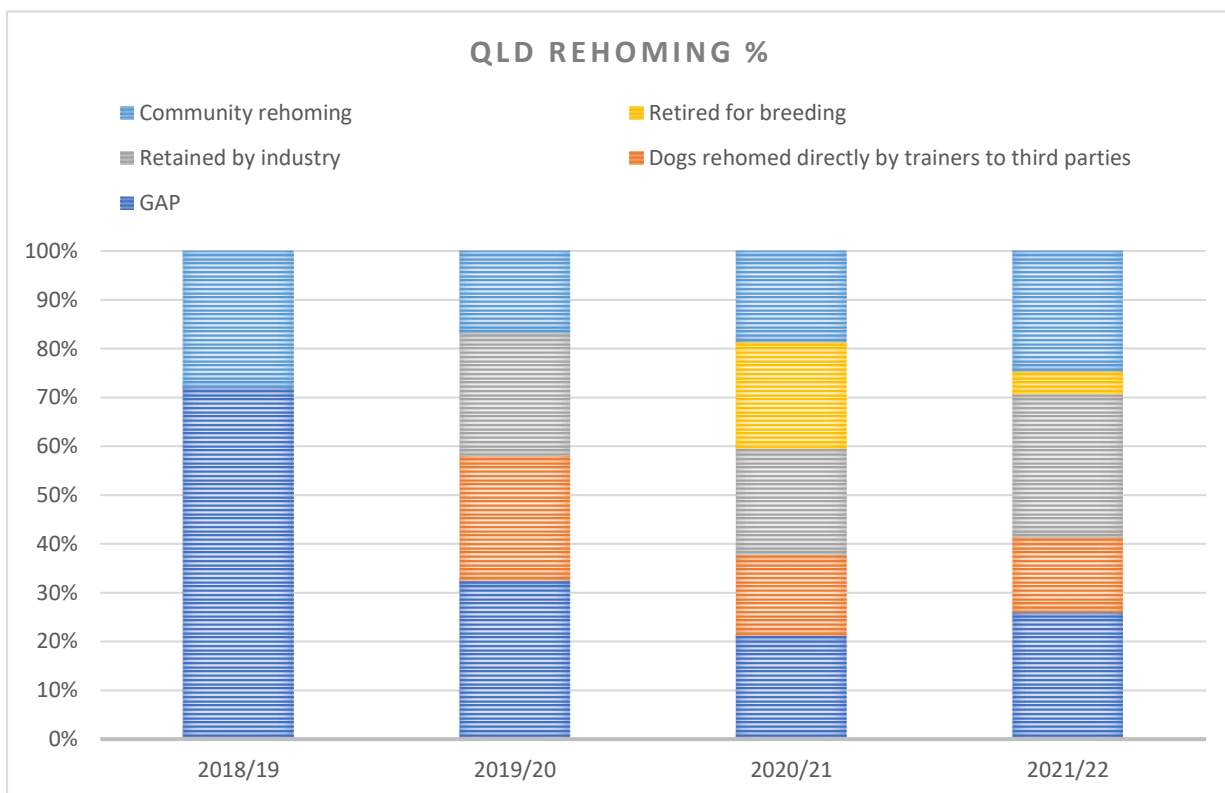


Figure 22: QLD Rehoming % (Coalition for the Protection of Greyhounds, 2023)

Rehabilitation and rehoming subsidies or incentives

- **Racing Animal Welfare (RAW) Grants**

The RAW Grants provide funding to enable eligible organisations to deliver animal welfare programs that abide with the QRIC’s funding priorities to rehome and retrain racing animals (Queensland Racing and Integrity Commission, 2023a).

Three categories of funding are available (Queensland Racing and Integrity Commission, 2023a):

- equipment grant – this provides funding for equipment including capital items – it must be demonstrated that these items have a direct impact to the welfare of retired racing animals;
- animal health grant – this provides funding for welfare and health initiatives;
- activities grant – this provides funding for eligible sponsorship and activities that promote the post-racing career of racing animals that have retired.

A total pool of \$70,000 is available. Each application is provided a maximum of \$5,000 with a maximum of three applications per organisation.

Victoria

Rehoming Performance

The Victorian Code of Practice for the Keeping of Racing Greyhounds outlines detailed requirements that must be followed prior to a greyhound being retired or rehomed.

All greyhounds that are retired must be:

- rehomed through GAP; or
- rehomed to a suitable home, where temperament and health of the greyhound have been deemed suitable for rehoming; or
- surrendered to a registered rescue group, shelter or community foster network; or
- kept as a companion animal; or
- euthanised by a veterinary practitioner given that the greyhound had behavioural or health issues or when no acceptable home could be found.

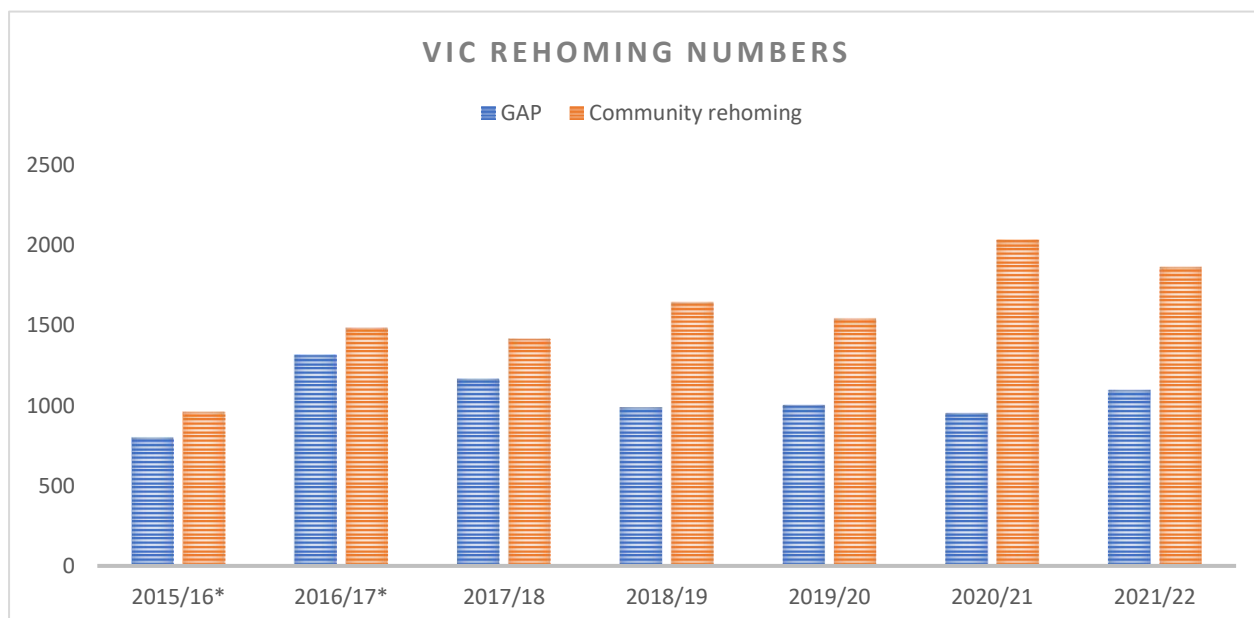


Figure 23: VIC Rehoming (Coalition for the Protection of Greyhounds, 2023)

* Data was overcounted for GAP and is unreliable

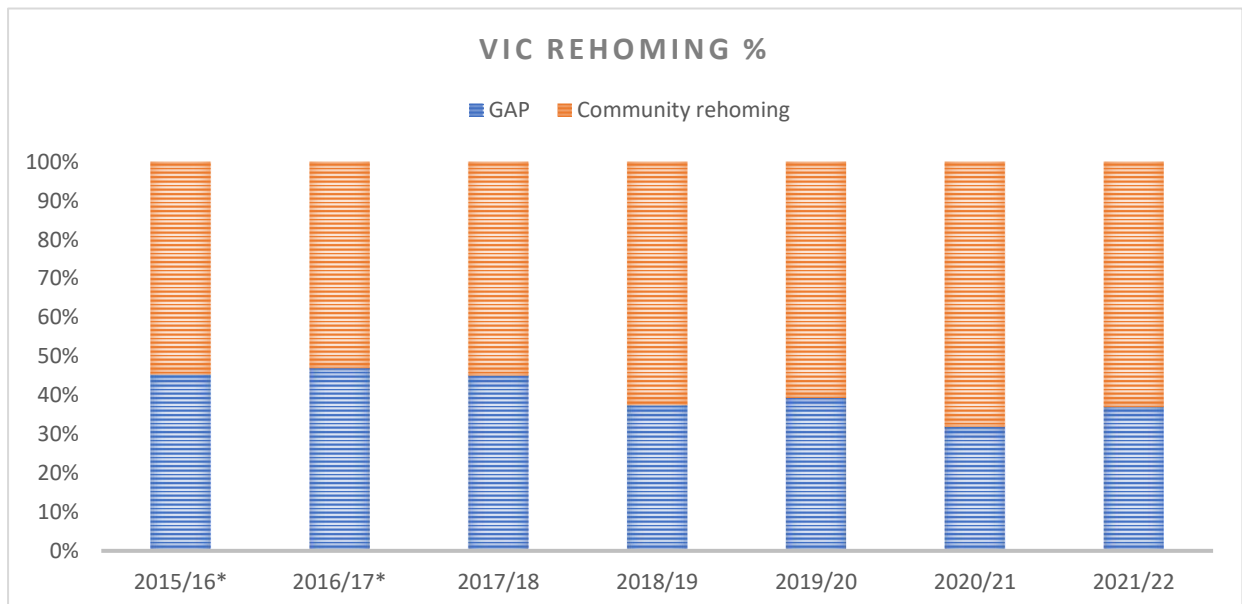


Figure 24: VIC Rehoming % (Coalition for the Protection of Greyhounds, 2023)

Greyhounds cannot be surrendered to a pound. They must be desexed prior to being rehomed to a member of the public, rescue group, shelter or community foster network. The person in charge or the registered GRV greyhound must keep records of unsuccessful rehoming attempts. (Victoria State Government, 2018).

Every establishment in Victoria that houses greyhounds must have an Establishment and Health Management Plan (EHMP) in place that covers general operational matters and greyhound welfare, socialization, education, enrichment and management. The EHMP is to be reviewed annually (Victoria State Government, 2018).

An EHMP allows flexibility for participants within the industry as they are able to nominate procedures and protocols that may differ from that outlined in the Code (Victoria State Government, 2018). However, an EHMP must be submitted to GRV and be approved by a veterinary practitioner.

Victoria has established a program that aims to rehabilitate greyhounds through interactions with prisoners. The program is a collaboration between GRV and Corrections Victoria

Rehabilitation and rehoming subsidies or incentives

- Individual Pet Rehoming Grants Program

This program has been established under The Animal Welfare Fund established under the *Domestic Animals Act 1994 (Vic)* provides funding for a number of welfare-related initiatives.

It offers assistance to organisations that rehome companion animals, including greyhounds, within Victoria.

In round 1 of funding, a total pool was provided of \$1.25 million. Eligible organisations can apply to be reimbursed up to \$200 per cat and \$500 per dog for costs incurred for (Animal Welfare Victoria, 2022) for:

- veterinary treatment, including microchipping, desexing, vaccinations or any other type of medical treatment; and/or
- expense on specific equipment that is provided to the new owner as part of the process of adoption; and/or
- services to deliver rehabilitation or training for a cat or dog.

An organisation can claim reimbursement for up to fifteen animals per application with a cap of \$250,000 per organisation unless otherwise approved by the relevant Minister.

- Desexing and Dental Scheme

This scheme provides funding for greyhound dental issues of \$400 if the dog was previously desexed, or, it provides \$400 and \$500 for the desexing of males and females respectively (Greyhound Racing Victoria, 2023a). However, this is only available to racing participants.

Western Australia

Rehoming Performance

Racing and Wagering Western Australia requires all racing establishments to create and follow an EHMP with the same requirements as seen in Victoria (Hutton McCarthy, 2021).

Greyhound owners must make all efforts to find a greyhound an appropriate home post-retirement.

Within WA, the options for rehoming a greyhound include:

- rehoming through Greyhounds as Pets (GAP); or
- keeping a greyhound as a companion animal; or
- euthanising a greyhound in certain situations.

As dictated under the relevant Code of Practice for the Keeping of Racing Greyhounds, the person responsible for the greyhound or the registered owner at the time of retirement is responsible for ensuring that the greyhound undergoes rehoming and retirement preparations (Hutton McCarthy, 2021).

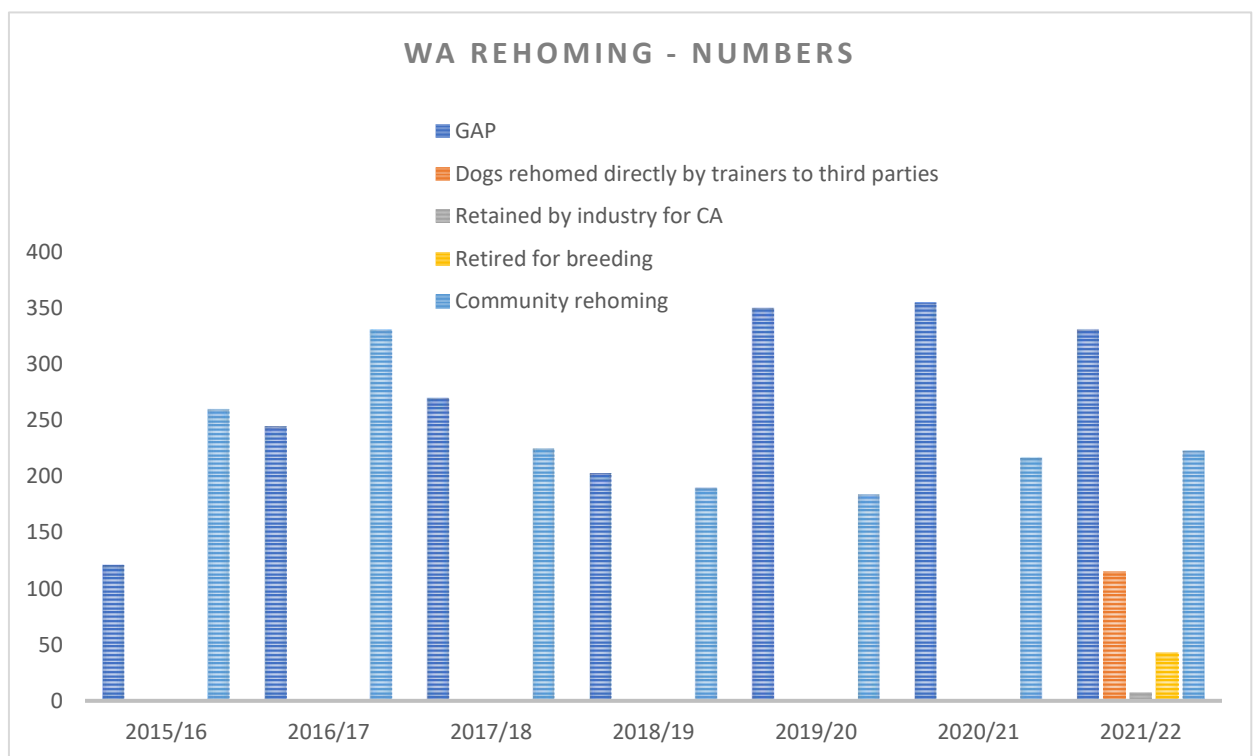


Figure 25: WA Rehoming Numbers (Coalition for the Protection of Greyhounds, 2023)

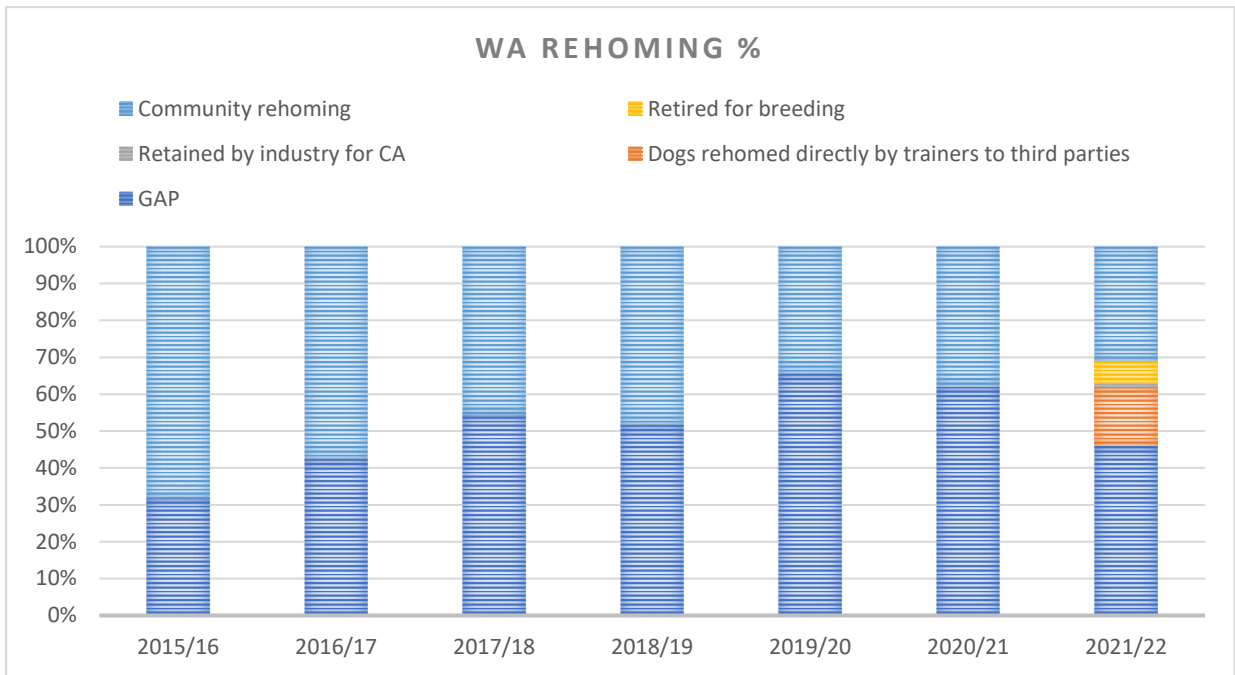


Figure 26: WA Rehoming % (Coalition for the Protection of Greyhounds, 2023)

South Australia

Rehoming Performance

GRSA must be notified when a greyhound is transferred to an adoption program, exported, surrendered to another organisation, retired as a companion animal, transferred to another industry participant, or euthanised according to GAR 22. Owners of greyhounds have a responsibility to ensure the welfare and care of their greyhounds during all lifecycle stages up until the end of their racing career where upon they are required to consider the retirement options available. a greyhound that is to be rehomed must first be assessed by GAPSA for suitability to be rehomed. Once it has been through this process, it may then be fostered out to program volunteers before being put up for adoption.

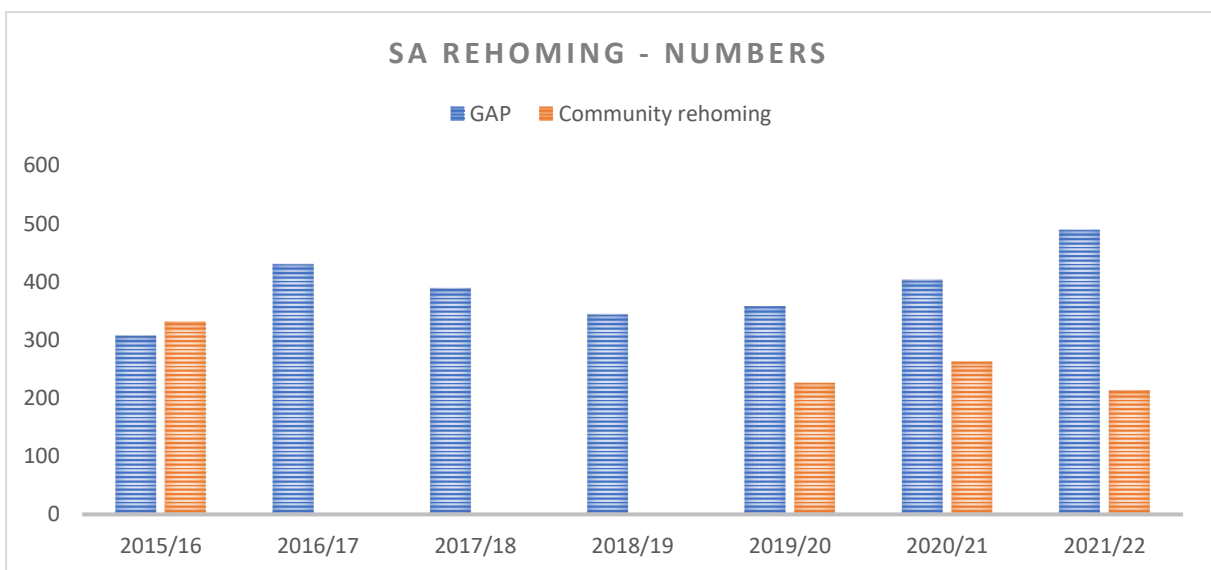


Figure 27: SA Rehoming (Coalition for the Protection of Greyhounds, 2023)

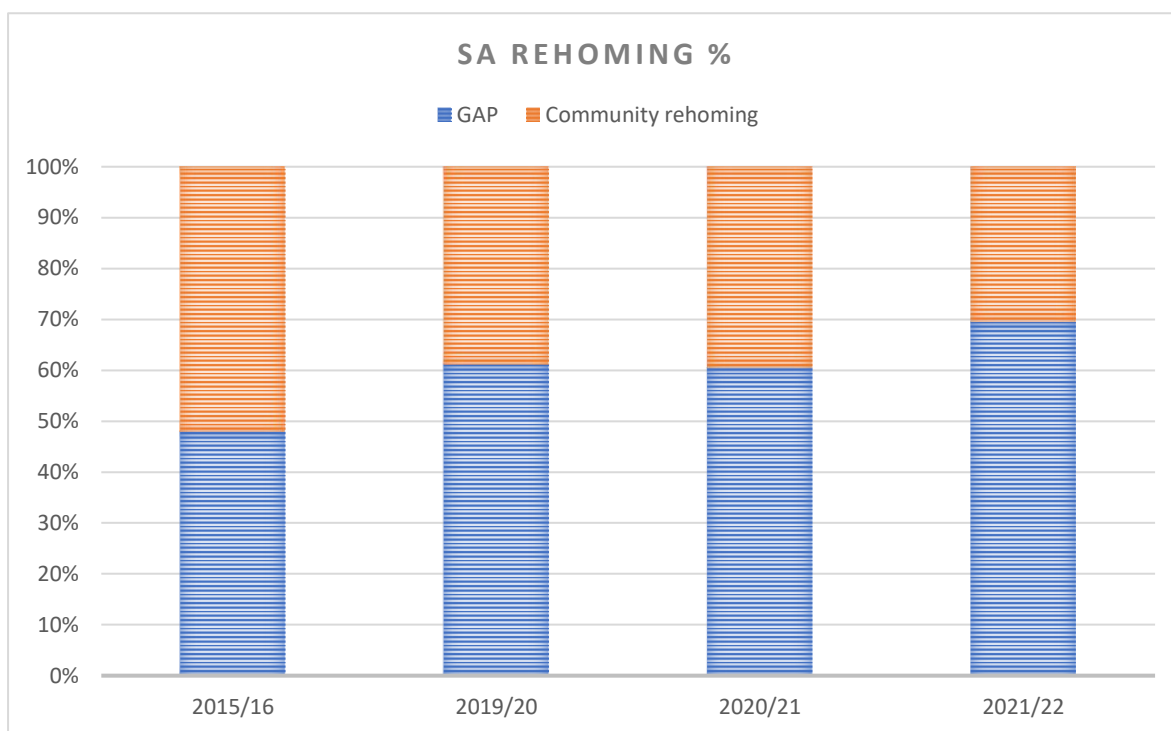


Figure 29: SA Rehoming % (Coalition for the Protection of Greyhounds, 2023)

Community-based rehoming programs have had mixed results in SA over recent years.

In their 2023 report, Ashton and Thomas listed a range of factors that may be linked to the issues the SA GAP has had with rehoming greyhounds, including:

- the restrictions on rental applicants with a pet in SA legislation;
- the increased rate of pet ownership from the pandemic;
- the cost of living crisis.

As in Victoria, there is a ‘prison pet’ program that fosters greyhounds with prison inmates. There are two sites in SA where this occurs with eight kennels at the Adelaide Women’s Prison and sixteen kennels at the Mobilong Prison (Greyhound Racing South Australia, 2017; Greyhound Racing South Australia, 2018). However, little can be found on recent outcomes from the program.

Great Britain

A number of initiatives have been introduced in Great Britain.

Lord Donoghue of Ashton in his 2007 report proposed that the greyhound registration fee be increased substantially, however, he stated that 70% of this fee be refundable given that the greyhound has at a later date been sold to another participant or its future has been appropriately handled in line with the relevant code or rules.

At the same time, Lord Donoghue recognised that a significant fee:

“... could and probably would incentivise some owners to abdicate their responsibility for making appropriate arrangements for his/her greyhounds on retirement. Some might take the view that they had paid their “retirement deposit” at registration and thus the challenge of actually making the necessary arrangements when the time came could safely be left to someone else. It follows that the bigger the sum involved, the bigger would be the temptation to do just that” (pp. 77-78).

The funds are to be retained by the GRS with interest accruing to be retained within the fund. If a greyhound is euthanised for economic reasons the fee is retained within the fund.

There is a discount offered for greyhounds that are British bred, however, this simple incentive scheme can be utilised for any other purpose when adopting the GRS system to urge trainers and breeders towards other objectives.

- Under the Greyhound Retirement Scheme an owner is required to pay £200³ at the time of registration. with this contribution directly matched by the Greyhound Board of Great Britain (2020) (GBGB). This total of £400 is then attached to the greyhound for their career and is only to be spent to aid in rehoming efforts.

The GRS has been implemented gradually with the first year requiring only £100 to be paid initially with the remaining £100 to be paid at any point up until and including upon retirement (Greyhound Board of Great Britain, 2020). The funds are released upon a successful submission of a 'Green Form' as is required within rule 18 of the GB Rules of Racing. Once submitted, the funds are directed towards the specified approved rehoming centre. A rehoming centre will be approved based upon an assessment of the following criteria (:

- Returns and euthanasia policy
- Homing policy
- Daily exercise routines
- Kennel environment
- Enrichment
- Diet
- Monitoring infrastructure
- Veterinary care
- Climate control
- Emergency procedures
- Security

Small grants are also made available to allow rehoming centres to improve their welfare standards, with £25,300 being made available since 2021.

The GBGB has committed to a range of other initiatives, including:

- funding an undergraduate research project to investigate the reasons behind failure in the rehoming process and to provide recommendations;
- collaborate with industry experts to ensure that greyhounds receive the best behavioural training possible in their retirement and preparation for entering a home;
- developing an education program specifically designed to educate retired greyhound owners in the care of their new companion animal;
- providing a 'welcome pack' to all new adopters that includes information collated from industry experts;
- further research into the causing factors of later rehoming issues and how this can be managed in the earlier stages of a greyhound's career;
- developing a free online network that allows for greyhound adopters to discuss their experiences and seek advice;
- extending the GRS to cover British-bred greyhounds that have never been raced.

(Greyhound Board of Great Britain, 2023):

³ As of the writing of this report (2023), this is equal to 382.34 AUD.

Appendix C: RSPCA policies relevant to racing

The RSPCA considers that there are significant and entrenched animal welfare problems inherent in the greyhound racing industry. These include problems with over-supply, injuries, physical overexertion, inadequate housing, lack of socialisation and environmental enrichment, training, illegal live baiting, administration of banned or unregistered substances, export and the fate of unwanted greyhounds (high wastage and high euthanasia rates).

Until all of these problems are recognised and effectively resolved, RSPCA Australia does not support greyhound racing.

However, where greyhound racing is to continue, the RSPCA advocates for the following measures:

- the comprehensive regulation of greyhound racing by an independent body with a formal and complete separation of the integrity and regulatory functions from the commercial functions;
- the adoption of compulsory and enforced animal welfare standards for greyhounds at all life stages to eliminate practices that cause injury, pain, suffering or distress and ensure all greyhounds have a good quality of life;
- the adoption of formal processes to address over-supply and wastage rates. There should be an expectation and formal processes in place within the industry that greyhounds will be rehomed as companion animals on retirement with provisions made to ensure their welfare;
- the mandatory collection and publication of comprehensive lifecycle (birth to death) records and injury statistics. Further, industry must develop a national identification and traceability system for all greyhounds to ensure each greyhound born is accounted for.

(See [RSPCA Policy Co6 Greyhound Racing.](#))

In preparing this report, we have attempted to provide an holistic overview of what is required to ensure that the best possible welfare outcomes are delivered for Tasmanian greyhounds, and that the treatment of racing greyhounds aligns as much as possible with the views and beliefs of the mainstream Tasmanian community.

Appendix D: About RSPCA Tasmania

Who we are

The Royal Society for the Prevention of Cruelty to Animals Tasmania (RSPCA) is a not-for-profit non-government organisation. We have been working to improve the welfare of animals within our state since 1878.

We are the only Tasmanian organisation to be explicitly named in animal welfare legislation and our long history of effective cooperation has allowed us to work with all manner of stakeholders towards the benefit of animals.

As a not-for-profit charity, we strive to maintain an open-door policy, so no abandoned, neglected, injured or surrendered animal is turned away or forgotten. Along with cats and dogs, the RSPCA provides assistance to a wide range of other animals, including horses, rabbits, guinea pigs, birds, goats and sheep.

In a 2023 survey from Kantar commissioned by the RSPCA Tasmania, 82% of those aware of our work report that they feel positive about us, with only 4% feeling negative. Our efforts within animal welfare advocacy have been well recognised by the community, with 84% of people believing that we care, and 78% agreeing that we are effective in our efforts. Further, 77% reported a high level of trust towards our organisation. This metric stands as a testament to our dedicated commitment to building relationships with the community and ensuring we are improving Tasmania's level of animal welfare towards contemporary community expectations.

In our Kantar Brand Perception Survey, the majority of negative comments related to a lack of response following cruelty reports. Our inspectors work tirelessly to answer reports, and whilst all reports are responded to, the time frame this occurs in could be drastically reduced through further funding.

What we do

Our key services for the Tasmanian community have been recognised as pet adoption, investigation and prosecution of animal cruelty and neglect, and educating owners on caring for their pets. Further, our services have become an integral part of Tasmania's animal welfare with 75% of the Tasmanian public aware of our investigation and prosecution services and roughly the same amount of people stating they were using our services or would do so in future.

However, we don't only serve animals in need, but also owners and carers who require guidance and support through education and assistance in relation to domestic violence, aged care, homelessness, mental health, and more.

During the past three years, RSPCA Tasmania has:

- Investigated over 25,000 reports of animal cruelty;
- Provided care for more than 6,670 animals; and
- Delivered information to thousands of people on animal welfare, responsible animal care and pet ownership through school, community and online education.

Our role is to act as a conduit for the community's concerns about animal welfare, to ensure those concerns are heard by our state's decision makers.

So our advocacy activities are a vitally important part of our work

Animals play a central role in the lives of many people. Most Tasmanians, whether they live in suburbia, rural properties, or in regional towns, say animal welfare is important or extremely important to them.

Clearly, the majority of Tasmanians expect improved animal welfare outcomes should be a high priority for the state government.

With an ultimate goal of improving animal welfare outcomes, we acknowledge the crucial role of humans in keeping our animals safe.

Our priorities

Our strategic priorities are built on the pillars of Animals, Sustainability, and Our People.

Within that framework we aim to:

- Constantly push for economic efficiency to maximise the use of our resources.
- Achieve the best welfare outcome for every animal in our care – through adopting socially conscious sheltering principles, improving the capability of our facilities, and increasing adoptions and foster care arrangements.
- Reduce animal cruelty and neglect – through advocacy that delivers legislative change, and community education that improves awareness and welfare outcomes.
- Reduce the number of surrendered and homeless animals – through increased desexing and microchipping programs and providing support to people in difficult circumstances.
- Support our people to do their great work – by building an exceptional workplace culture, and a dedicated network of foster carers, volunteers, and animal specialists.

How we work

- Our Animal Care Centre (ACC) at Devonport is dedicated to caring for, rehabilitating, and rehoming animals.
- Our Adoption and Retail Centres (ARCs) in Latrobe and Launceston are our bases in the community. Animals are surrendered and rehomed through these centres; owners can access advice and supplies for their companion animals; and our ARC teams assist with local microchipping and education activities in their communities.
- Our Community Outreach Centre in Hobart is the base for our activities in the south of the state and provides a central location for many animal welfare organisations to come together.
- Our Inspectorate operates under delegated powers from the state government to investigate and prosecute instances of alleged animal cruelty. Inspectors are co-located with DPIPWE in Hobart, Launceston, and Devonport, and operate across the state. This team is supported by a call centre equipped to handle reports.
- Our team of dedicated volunteers assists across all our activities. They serve on our board; they care for animals in our ACC and ARCs; they organise fundraising events; and they support us in many other activities. We could not do what we do without these wonderful people.
- Our corporate office is located in Launceston. Supporting our frontline teams, a group of dedicated professionals work across many areas – including fundraising and marketing, policy and advocacy, volunteer organisation, project delivery and – last but not least – our administration team who answer the phones and keep the lights on.



CONTACT DETAILS

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Email: rspca@rspcatas.org.au Web: www.rspcatas.org.au

Animal Cruelty Hotline: 1300 139 947; reportit@rspcatas.org.au

