

29 January 2016

Mr Rob Hansen  
Research Director  
Agriculture and Environment Committee  
Queensland Parliament

[REDACTED] aec@parliament.qld.gov.au

Dear Mr Hansen,

**Submission re *Racing Integrity Bill 2015***

Animals Australia is a peak animal protection organisation in Australia. On behalf of our member societies and individual members and supporters we are pleased to be able to provide the following submission regarding the *Racing Integrity Bill 2015* (hereafter, **the Bill** or **New Act**).

We note that the main focus of the Bill is to implement recommendations 1 to 3 from the report of the Queensland Greyhound Racing Industry Commission of Inquiry.<sup>1</sup> These recommendations cover: the “conflict of interest” that exists within the racing statutory bodies whereby the administration/commercial arm is the same department charged with overseeing enforcement and welfare functions; standardisation of the current tri-board structure of the racing codes; and amendments to the *Animal Care and Protection Act 2001* to provide improved information-sharing capacity and broaden authorised officer powers to investigate and respond to animal welfare matters and breaches of the Act related to the racing industry.

Further, we note that the Bill has been presented to “*safeguard the welfare of animals, to ensure the integrity of persons involved in the racing industry and to manage matters relating to betting and sporting contingencies, and to amend [inter alia] the Animal Care and Protection Act 2001.*”<sup>2</sup>

This submission will address the scope of the Bill. At the outset, we wish to state that we commend the Committee on its efforts and intentions around the introduction of the Bill. It is our informed view, however, that irrespective of any new level of oversight and increased enforcement powers, various illegal and unacceptable practices in the industry - motivated by and designed to gain a winning advantage - will continue.

---

<sup>1</sup> Available at: <http://www.greyhoundreview.qld.gov.au/>.

<sup>2</sup> The Hon. WS Byrne, Explanatory Statement *Racing Integrity Bill 2015*, 3 December 2015. Available at: <http://www.parliament.qld.gov.au/documents/committees/AEC/2015/07-RacingIntegBill2015/07-trns-exsp03Dec2015.pdf/>.

Animals Australia made a comprehensive submission to the *Review into the Regulation of the Queensland Greyhound Racing Industry* in April 2015. We refer to and repeat these submissions which we attach at **Attachment A** for convenience. In summary, in that submission, we provided information which supports our view that there are serious and inherent issues in the greyhound racing industry – in particular: live baiting; overbreeding; the killing of healthy greyhounds; injuries; inadequate housing; handling and training methods; and the drugging of dogs with substances such as methamphetamines and anabolic steroids – which cause ethical and welfare issues for the dogs. All illegal acts constituting serious animal cruelty, and which are unacceptable to the Australian community. Importantly, we note that such critical issues are not unique to the greyhound racing code.<sup>3</sup>

It has become evident over the past year that these are entrenched cruel practices – particularly live baiting. There is an enduring level of non-compliance to modern standards (including industry standards) that demonstrates an insular and unacceptable culture. This culture is illustrated by live baiting episodes being found even after the February 2015 ABC Four Corners' *'Making a Killing'* exposé. For example, in May 2015, the joint Queensland Police and RSPCA Taskforce charged two further men with live baiting, this time including the use of kittens, occurring up until May 2015 despite a high level of known scrutiny of the industry.<sup>4</sup>

Another example of the entrenched cultural issue is a persistently high number of greyhounds, not only from Queensland, being sent to Hong Kong and Macau without 'passports'. These exports are in contravention of the *Greyhounds Australasia Rules*, and in defiance of the Greyhounds Australasia ruling that on welfare grounds Australian greyhounds must not be exported to the Canidrome in Macau. This was the subject of another national exposé on the industry – this time on the *730 Report* in December 2015. In December 2015, Animals Australia lodged formal complaints with Racing Queensland regarding greyhounds exported in the past year (many since the ABC exposé) from QLD to Macau, in contravention of *Greyhounds Australasia Rules*.<sup>5</sup>

In Animals Australia's view, that there can be no confidence that ramped-up regulatory-imposed protocols and enforcement will effectively change the unacceptable status quo and entrenched systemic culture of this industry, as described above. It is in this context that we provide the following comments regarding the Bill.

---

<sup>3</sup> Many of these issues present in the horse racing code – particularly "wastage" and use of drugs – as has been acknowledged in the explanatory statement to the Bill. See: The Hon. WS Byrne, Explanatory Statement *Racing Integrity Bill 2015*, 3 December 2015. Available at: <http://www.parliament.qld.gov.au/documents/committees/AEC/2015/07-RacingIntegBill2015/07-trns-exsp03Dec2015.pdf/>.

<sup>4</sup> ABC, *'Kittens used as live bait in greyhound racing'*, available at: <http://www.abc.net.au/news/2015-05-19/kittens-used-as-live-bait-in-greyhound-racing/6481250>.

<sup>5</sup> The full formal complaints dated 10 December 2015 (and subsequent Addendums) can be provided to the Committee. Formal complaints regarding dog exports to Macau were also similarly lodged in December 2015 with the greyhound racing authorities in Victoria, NSW and Tasmania. The shocking conditions for dogs exported to greyhound racing tracks in Asia were exposed further in an ABC 7.30 story in December 2015: <http://www.abc.net.au/7.30/content/2015/s4369266.htm>.

## The Queensland Integrity Commission

The new Queensland Racing Integrity Commission (the Commission) will be responsible for the management of animal welfare and integrity matters within the racing industry. For the reasons set out below, Animals Australia submits that the intended “independence” of the Commission is compromised:

- The functions of the Commission are, *inter alia*, “to promote compliance and integrity by educating, providing information for, and working with, participants”.<sup>6</sup> This function creates an avenue to forge working relationships between the Commission and the industry. Such relationships are a pre-cursor to conflicts of interest because a body that is charged with investigation and enforcement powers is also forging relationships with the very industry that it is supposed to be ‘policing’.
- Section 56(1) of the Bill provides that funding for the cost of the performance of the Commission’s function is to be funded mainly by the control bodies. Again, a conflict of interest ensues here because the investigation and enforcement arm of the industry is being funded by the very industry that it is charged to ‘police’.
- We note that staff for the Commission will be transferred from existing staff presiding in Racing Queensland and the Department of National Parks, Sport and Racing. We query how these candidates will be vetted for “independence” in this intended new model.
- Section 18 of the Bill provides that persons eligible to be Commissioner or Deputy Commissioner include a person that is not, and has not been in the previous two years: a member or employee of a control body; and an executive officer of a corporation that is an approved control body. Per the previous point, we query how these candidates will be vetted for “independence” in this intended new model.

## Application of *Standards*

The Bill provides for the application of ‘standards’ for codes of racing – which can apply to an animal, club, participant or venue.<sup>7</sup> The standards apply to a licensing scheme for a code of racing, the purpose for which is to ensure, *inter alia*, the integrity of racing activities conducted as part of the racing code; and the welfare of licensed animals while involved in racing or training, or activities associated with racing or training.<sup>8</sup> Such standards are not subordinate legislation under the New Act, which effectively means that they have no legislative force.

---

<sup>6</sup> *Racing Integrity Bill 2015*, section 10(1)(l).

<sup>7</sup> *Racing Integrity Bill 2015*, section 62.

<sup>8</sup> *Racing Integrity Bill 2015*, section 62.

They can, however, potentially be used as a defence to a charge under the New Act or a related Act.<sup>9</sup>

The key concern here is that the standards could create a risk of lessening the threshold for an act or omission under the New Act or a related Act, thereby providing a 'defence' to a contravention of any of those Acts. This is a very real concern, as such an issue is already in force due to the existence of unenforceable Codes of Practice which provide a defence to an animal welfare charge under the respective state animal protection laws. For example, the *Queensland Animal Care and Protection Act 2001* (hereafter, **ACPA**), by section 38, defines an 'offence exemption'. Then, by section 40, it provides that compliance with the requirements of a code of practice is an offence exemption. Thus acts or omissions which would satisfy the offence provisions of section 18, or breach the duty of care prescribed by section 17, are made legal.

It is these codes that 'legalise' intensive farming practices and lessen the threshold of animal care obligations under the state Acts. For example, mother pigs can be locked up in crates barely bigger than their bodies for most of their pregnancy. Piglets can have their tails sliced off and teeth cut without any form of pain relief. Laying hens suffer their entire lives in battery cages where they can't even stretch their wings and millions of 'meat chickens' die every year because they are bred to grow so fast that their legs are unable to support them.<sup>10</sup> We raise this as a potential concern for the operation of these intended codes or standards under the Bill as their application could lessen the protection of animal welfare in the new Act and related Acts.

### **Animal Welfare Gaps in the Bill**

Despite a key tenet of the tri-fold intentions of the Bill being to safeguard animal welfare, the Bill does not go far enough to achieve this. For example, under section 68 of the Bill, an application for a licence for an animal, club, participant or venue under the Bill cannot be granted in certain circumstances which are silent on animal welfare considerations (past charges or convictions). Sections 71 and 74 provide for the cancellation or suspension, or immediate suspension, of a licenced club's licence in certain circumstances which are silent on animal welfare considerations (past charges or convictions). Animal welfare contraventions (being charges or convictions) are not expressly provided as grounds for consideration in such sections.

We also note that the Bill, at sections 242 and 244, provides for additional indictable offences. These offences are contraventions related to bookmaking and gambling/betting activity. Again, no such express provisions cover animal welfare safeguards.

---

<sup>9</sup> *Racing Integrity Bill 2015*, section 308.

<sup>10</sup> See, for example: Caulfield, M. *Handbook of Australian Animal Cruelty Law* (2009); McEwen, G. *Animal Law: Principles and Frontiers* (available at: <http://bawp.org.au/animal-law-e-book/>).

## Investigation and Enforcement

Chapter 5 of the Bill covers investigation and enforcement provisions for authorised officers. That is, powers for offences against the New Act or the *Racing Act 2002*. In line with recommendation 3 from the report of the Queensland Greyhound Racing Industry Commission of Inquiry, we note that here the Bill intends to standardise the powers of authorised officers under the racing scheme and the ACPA. The Bill has attempted to mirror the powers of the ACPA officers. For example, see sections 176, 177, 178 and 179 of the Bill. The Bill permits authorised officers appointed by the Commission to issue directions, enter premises in relation to the protection of a licenced animal, and, if necessary, provides power to seize the animal. The Bill also provides for new information-sharing powers between officers across relevant agencies to improve the investigation into, and prosecution of, animal welfare offences.

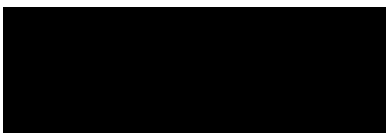
Animals Australia welcomes and commends such efforts to strengthen investigation and enforcement powers in this context. Any proactive measures to prevent animal cruelty and animal welfare issues from presenting are welcome.

It is inexorable, however, that our commendation of the efforts of the Committee is to be shadowed by the significant numbers of trainers that have shown a willingness to engage in illegal activities in the past and present, regardless of the immoral as well as criminal nature of these activities. It is also the case that it was public national exposés that have exposed much of these activities causing community outrage – and the creation of Police taskforces leading to serious criminal charges. In our view, it is highly likely that with such a known and unacceptable culture in this industry that rather than cease, trainers will simply become more imaginative and careful to ensure that such systemic practices are not detected.

Thank you for the opportunity to provide these submissions.

Please contact us if further information or clarification is required.

Yours sincerely,



Glenys Oogjes  
***Executive Director***

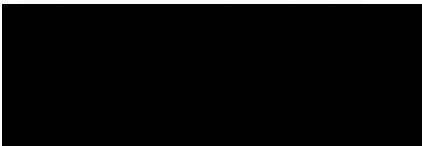




If this Inquiry concludes that the industry should be allowed to continue, then Animals Australia has detailed in this submission, steps that should be immediately taken to address overbreeding and wastage.

Please contact me if you require further information or explanation.

Yours sincerely,



**Glenys Oogjes**  
Executive Director



***Animals Australia Submission to the Review into the regulation of the  
Queensland Greyhound Racing Industry***

**1 April, 2015**

**Table of Contents**

<b>1</b>	<b>OVERBREEDING AND ‘WASTAGE’ .....</b>	<b>4</b>
1.1	Summary .....	4
1.2	Queensland .....	4
1.3	Greyhound Adoption Program (GAP) .....	5
1.4	Breeding Incentive Schemes .....	5
1.4.1	<i>Queensland QGreys Breeders Incentive Scheme</i> .....	6
1.5	Recommendations to end overbreeding and ‘wastage’ .....	6
<b>2</b>	<b>WELFARE ISSUES.....</b>	<b>7</b>
2.1	Statistics – injuries and deaths.....	7
2.2	Racing risks.....	7
2.3	Killing methods for unwanted greyhounds.....	8
2.4	Doping.....	9
2.5	Live baiting.....	9
2.5.1	<i>Evidence in Queensland</i> .....	9
2.5.2	<i>Legislation</i> .....	11
2.6	Greyhound industry animal welfare initiatives.....	11
2.7	Codes of Practice.....	12
<b>3</b>	<b>REGULATION AND INSPECTION OF TRAINERS PREMISES.....</b>	<b>13</b>
<b>4</b>	<b>GOVERNMENT FUNDING .....</b>	<b>13</b>
<b>5</b>	<b>APPEARANCE MONEY (also called ‘starters fees’ or ‘unplaced money’).....</b>	<b>14</b>
<b>6</b>	<b>PRIZE MONEY .....</b>	<b>14</b>
<b>7</b>	<b>RACING INTEGRITY .....</b>	<b>14</b>
<b>8</b>	<b>GREYHOUND RACING INTERNATIONALLY.....</b>	<b>15</b>
<b>9</b>	<b>REFERENCES .....</b>	<b>15</b>



# 1 OVERBREEDING AND 'WASTAGE'

## 1.1 Summary

On a national basis, from available industry figures, we estimate that of the ~20,000 greyhound puppies born each year in Australia,<sup>i</sup> only around 2,000 (or ~10%) will live a full life span. The greyhound racing industry in **Queensland** is the third largest (after NSW and Victoria) in Australia, and it is estimated that some 1,700 greyhounds (from unwanted pups to retired racers and breeders) are killed each year in Queensland.

Nationally, some 60% of greyhound puppies will be registered to race (GRV FOI provided 'Destination Reports'<sup>ii</sup> for all States & GRV to Q 9013 by Greens 2012<sup>iii</sup>). The others (~ 8,000 pups) are unaccounted for, and almost all of these unwanted pups will be 'euthanised'. Some industry statements refer misleadingly to a 'named' figure and percentage, but in fact many hundreds of dogs are 'named' each year but do not go on to race.<sup>iv</sup>

Greyhound racing careers are quite short – 1 to 2 years. They commence racing in their 2<sup>nd</sup> - 3<sup>rd</sup> year and most retire between the ages of 2-4 years.<sup>v</sup> Approx. 12,000 greyhounds are 'retired' from racing (at just 2-4 years old) each year in Australia, but only 10-15% of those dogs will go onto breeding or be rehomed, with the rest being killed.

Even breeding greyhounds are likely to be killed at ~5 to 6 years of age. Brood bitches (and a few sires) will usually have a short life post-racing. That is, the brood bitches will spend a couple of years racing and then a couple of years having around 3 -4 litters of pups, meaning the dogs will live to 5 or 6 years of age (GA's new breeding standards confirm few breed over 6 years of age).<sup>vi</sup>

Industry data leads to the estimate that only some 10% of pups born each year are destined to live out a natural life span; that is, just some 2,000 dogs born each year will survive long term. The only dogs to live a full life span will be the Greyhound Adoption Program (GAP) dogs,<sup>vii</sup> those adopted out by the greyhound rescue groups and a few dogs that live out their life with the small scale (hobby) trainers.

Despite this high level of 'wastage', in each State there are greyhound 'breeding incentive' schemes. In Queensland (called "QGreys"), as elsewhere, the scheme provides bonuses on top of prize money for Queensland born pups running in that State's races. Further, racing greyhounds that are not placed in a race will be paid an appearance or starters fee to encourage breeders and owners to continue in the sport. The Queensland government provided \$1.2M in 2014 to enable Racing Queensland to pay out appearance fees to race starters.

Note: Under national (GA) Rules, the number of pups whelped is **self-reported** by the breeder (within 14 days of whelping, by submitted form), and 'registration' of the litter occurs between 10 and 16 weeks of age (inspected by RQL with prior notice), thus the numbers whelped may be under-reported (and the number killed higher). A mechanism to enhance confidence in regard to the number of dogs born each year (and thus track them) is required; e.g. through required ultrasound and/or veterinary certification of the outcome of the pregnancy and pups born.

## 1.2 Queensland

In 2012 around 1,910 pups were born in Qld.<sup>viii</sup> 60% of those born in 2012 were subsequently raced—i.e. 1,155 (Destination report). Some 755 pups didn't make it to the race track.

It is estimated there are about 2,300 dogs are racing/in training in Queensland at present. The dogs race for approx. 2 years, and so an estimated 1900 retiring racers will be killed over a couple of years.

There is a very low GAP adoption rate (2012/13 just 73 dogs were adopted via GAP Queensland<sup>ix</sup> and only 98 in 2014<sup>x</sup> ) it is likely that in any year the number of pups killed and retiring racers killed would together mean around 1700 healthy dogs killed in Qld each year.

### 1.3 Greyhound Adoption Program (GAP)

Only a relatively small number of ex-racing dogs are re-homed by state-based GAPs. As indicated above, in Queensland, that equates to some 73 dogs in 2012/13 and 98 in 2014.

There is significant concern that the manner in which racing greyhounds are raised, housed and trained - often without adequate socialisation - makes their adjustment to life as a pet (and their 're-training') particularly difficult. The cost of re-training and adjusting ex-racing dogs to domestic life is high – with conservative estimates being around \$3,000 per dog.<sup>xi</sup>

Whilst the aim of the GAPs is laudable and supported, the industry often seeks to 'use' GAP to provide a positive image of the industry, despite the very limited number of dogs adopted, and the associated 'cover-up' in a public sense of the many dog that are killed.

### 1.4 Breeding Incentive Schemes

Despite the ethical issue of the breeding of thousands of dogs each year that will never race, greyhound breeding incentive schemes operate in each State. The schemes aim to encourage breeding of greyhounds and racing by awarding bonuses (for racing wins) to those locally bred dogs who participate in races in their birth State; seemingly to ensure the viability and prosperity of the sport.

It costs owners/trainers to enter the schemes, but the bonuses paid (on top of usual prize money) can be high.

These incentives to breed are in stark contrast to industry statements about regulating and controlling breeding to reduce the breeding of excess pups (that never race). Greyhound Australasia's (GA) new breeding standards which will commence in July 2015 state:

*The industry's National Greyhound Welfare Strategy was approved by the GA Board in May 2014. Amongst its objectives are better protection of the welfare of our industry's breeding animals, and **reducing the number of greyhounds bred that are unlikely to be suited to racing.***<sup>xii</sup>

The new GA breeding code fact sheet<sup>xiii</sup> states that one of its key aims is 'reducing the number of pups born that have very limited chances of ever racing'. However, the new GA Breeding Standard proposed is unlikely to make any significant dent in current high breeding rates.

The changes include that a greyhound bitch must be registered before being bred the first time, will not be permitted to have litters over 8 years (unless vet checked), cannot have more than 3 litters unless a National Breeding Panel considers and allows a 4<sup>th</sup> or subsequent litter, and a bitch can only have 2 litters in 18 months.<sup>xiv</sup> However, GA (industry) statistical information shows that these changes will have little impact on breeding; very few bitches have litters after 7 years of age, only 13.5% of bitches have a 4<sup>th</sup> litter, and less than 6% have a 5<sup>th</sup> or more litters. Regardless, the Breeding Panel may well allow further litters.<sup>xv</sup>

It is highly likely that the breeder incentive schemes (added to lucrative prize money and even starters fees/appearance money) nullify any such attempt to introduce more responsible breeding practices.

#### **1.4.1 Queensland QGreys Breeders Incentive Scheme**

Introduced in late 2013 (but replaced an earlier breeding incentive scheme). Registered greyhounds for the QGreys breeding scheme<sup>xvi</sup> will provide stakeholders with the opportunity of winning \$750,000 in programmed events. The listed bonuses range from \$500 to \$1200 per race. In the 2013/14 RQL annual report it advises some 900 pups/dogs have been registered (in the first 9 months of the scheme).

Breeding pup numbers and racing figures are steady in Qld – in 2008 2,281 whelped and 63.17% raced, in 2012 1,910 pups whelped and 60.47% went onto race.

#### **1.5 Recommendations to end overbreeding and ‘wastage’**

It is a more than reasonable expectation that the greyhound racing industry takes responsibility for every dog it breeds and every dog retired from racing. It is unsustainable and unethical for dogs to continue to be bred and killed in such numbers. Animals Australia recommends the following measures be implemented to address the unacceptable number of young and healthy dogs killed by the greyhound racing industry each year.

- All greyhound breeding incentive schemes to be cancelled immediately. This includes the Greyhound Owners & Breeders Incentive Scheme (GOBIS) in Victoria, the Betfair Blue Paws Breeders & Owners Incentive Scheme in NSW, the WESTCHASE scheme in WA, and any/all state and/or national programs that provide any kind of reward or incentive (financial or otherwise) for greyhound breeding.
- All racing greyhounds must be retired into a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs) within three years of the commencement of their racing life.
- Similar to schemes whereby a percentage of poker machine revenue is allocated to problem gambling programs - on an ongoing basis a 1% subsidy from wagering must be allocated to the rehabilitation/rehoming of greyhounds into a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs). This includes: retired greyhounds; greyhounds bred for racing that do not qualify for a racing career; and greyhound pups unwanted for racing.
- A mandatory ‘retirement fee/levy’ to be made payable by greyhound breeders: calculated on a per litter basis. The revenue raised will be allocated to the rehabilitation/rehoming of all greyhounds, as described in condition 3 above.
- All pups born that are unwanted for greyhound racing must be rehomed into a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs). The greyhound regulatory bodies must consider this requirement and provide a solution to implementing this requirement – as part of this term. For example, by requiring the results of mandatory ultrasounds of all pregnant breeding dogs at the time that they are vet-checked to be lodged with the racing bodies, and which will be checked against the actual litter size. Any stillbirths or deaths must then be certified from an authorised independent veterinarian in order to account for all puppies born, and ensure they are tracked from ‘cradle to grave’.

- All female breeding greyhounds must be desexed, rehabilitated and rehomed to a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs) after a maximum of three litters.
- All male breeding dogs (studs) must be desexed, rehabilitated and rehomed to a suitable domestic environment (that is, a domestic environment or rescue group depending on any rehabilitation needs) after a maximum of three years.

## 2 WELFARE ISSUES

### 2.1 Statistics – injuries and deaths

Stewards' reports from each State racing authority show that on a **national** basis:

- 4 to 5 dogs on average every week are killed on the race track at official meetings.
- Up to 200 dogs will be injured each week during these races.
- Many thousands of dogs are 'scratched' each year before races due to injury.

In **Queensland** the reported figures from Stewards' reports at official races over the past 3 years show:

- 2012 – 19 died/euthanised, 609 injured.
- 2013 – 5 died/euthanised, 798 injured.
- 2014 – 49 died/euthanised, 859 injured.

Please note that the injuries do not include 'scratchings' before the race due to injury or the dogs that were vetted after the race.

### 2.2 Racing risks

Injuries and deaths could be significantly reduced by installing straight tracks (or at least no 'turn starts' when the bend is soon after the start) and/or reducing the number of dogs in races to avoid collisions (the primary cause of injuries). An industry commentator suggests only 4 dogs racing at high speed can safely round a bend.<sup>xvii</sup>

There has been considerable research to determine the risk factors facing racing greyhounds. One USA study by *Sicard et al* (1999)<sup>xviii</sup> found that race speed, race distance and track design is associated with higher orthopaedic injuries to greyhounds. The tracks with the shorter initial straightaway (before the turn), decreased turning radius (tighter), and increased turn bank cause higher injuries.

The ongoing pressure on the bodies of racing dogs running on a circular track has also been investigated in Australia. A recent finding by *Cave*<sup>xix</sup> showed that bone 'remodelling' occurred when the body lays down more bone after stress fractures. *Cave* believes that a contributing factor to this is the dogs running fast around anti-clockwise tracks, as it places much more pressure on the left hand side of bodies/muscles/bones. The study found that it is in this area where the majority of bone remodelling occurs (asymmetrically).

There are few straight tracks in Australia and the industry does not appear to be acting on these findings.

Over-racing

Racing frequency schedules for dogs are not regulated in the Code or in the racing industry Rules. 'Over racing' of greyhounds occurs in the industry and is prompted by the often high stakes offered. A recent industry commentator noted that stewards rarely take action even in extreme cases. Stewards did recently request an explanation from a trainer in Victoria<sup>xx</sup> whose dog, *Dyna Malaise*, had run 5 races in 12 days. The trainer advised the stewards he then intended to 'kennel' the dog for a week, and no further action was taken. Similarly a dog called *Harrier Bale* (a maiden) had 12 races between January 15 and March 13 2015 - an average of 4.8 days between each race, but it was only when the dog raced three times in five days that the stewards noticed.<sup>xxi</sup> Both these dogs were owned by the same person, but there is no rule against running dogs this often. Greyhound veterinarians have suggested a 7 day break between each race would be acceptable.

### Heat stress

In Australia, it is concerning that dogs being transported to and from tracks and during racing may experience high temperatures that will affect their welfare. *Jane McNicoll* studied temperature environments in transport trailers and examined individual greyhound temperature at racing tracks in South Australia. In 2012, *McNicoll* reported the results to the Greyhound Veterinary Association. *McNicoll* concluded that '*transporting dogs in standard trailers [without air conditioning] in ambient temperatures >33°C may challenge dogs' homeothermy and transporting dogs at such temperatures, before or after strenuous exercise may pose a significant risk of initiating heat illness*'.<sup>xxii</sup>

The RQL heat policy allows voluntary scratching (without penalty) of greyhounds only when the temperature is forecast to exceed 38 degrees and the owner/trainer does not have an air-conditioned trailers or lives further than 1 hour from the track.<sup>xxiii</sup> A race meeting will only be cancelled when the forecast temperature will be 40 degrees or above. There is no rule therefore to protect all greyhounds from high temperatures (>33 degrees - <40degrees) which may still seriously affect their health and welfare.

It seems clear again that industry self-regulation is not in the best interests of greyhound welfare.

## **2.3 Killing methods for unwanted greyhounds**

Each of the state racing authorities recommend euthanasia by veterinarians – but do not require it.

Leading Sydney greyhound vet, Ted Humphries, admits he puts down an average of four greyhounds a week. He says he '*despises doing it, but is afraid that if he doesn't humanely euthanise them, then they'll be inhumanely disposed of via blunt force trauma, shooting, gassing, hanging or drowning*'.<sup>xxiv</sup>

Stories of greyhounds being killed inhumanely are often reported, but their frequency is unknown. Very young pups are likely to be drowned (anecdotally reported) or bludgeoned to death, whereas sub-adult or adult dogs may be shot on properties.

In terms of disposal, tip-offs to Animals Australia and others report that greyhound properties will usually have a pit to dispose of dogs. Further, the recent ABC *Four Corners* report included a trainer (at the trial track of Tom Noble) in Queensland describing how a hole-digging machine was used to make a pit for dead greyhounds.

To improve welfare and confidence in the treatment of 'unwanted' greyhounds, it is clear that greyhounds that are to be retired but cannot be rehomed must (in future) be killed by a veterinary surgeon (lethal barbiturate overdose). To ensure this, every notification of the death or retirement of a registered greyhound would need to be accompanied by a veterinary certificate, or a GAP or other adoption papers (respectively).

## 2.4 Doping

Doping of animals is a widespread issue within the greyhound racing industry. The administration of drugs such as amphetamines, methamphetamines and its metabolites to dogs extends beyond a breach of the Greyhound Racing Rules. Such practices breach animal welfare legislation in each state, as they expose the affected dogs to animal welfare and health risks. Further, the possession of such drugs is an offence under criminal law and prohibited drugs legislation.

Greyhounds frequently test positive for drugs such as cocaine, EPO, amphetamines, caffeine, anabolic steroids and Viagra, which are administered in attempt to make the greyhound perform at a faster rate.<sup>xxv</sup> A 2013 ABC 7.30 *Report* investigation showed that although approximately half of all dogs that tested positive for banned substances were in NSW, the 'doping issue' is clearly a national issue affecting the industry.<sup>xxvi</sup> Further, it has been reported that 80 per cent of greyhound trainers consider providing some sort of illegal substance to dope their dogs.<sup>xxvii</sup>

Current regulatory oversight is doing nothing to deter this behaviour. This is further evidenced by the fact that in January 2015, a dog trained by Victoria's number 1 trainer, Jenny Hunt – the step-daughter of suspended Hall of Fame trainer Graeme Bate – tested positive to amphetamines and methamphetamines. This trainer earned well over 1 million dollars in prize money last year. In WA, Linda Britton, of the famous Victorian greyhound dynasty, was named 'Trainer of the Year', despite being suspended for 18 months for drugging offences.

In Queensland, the Stewards Reports on the GR Queensland website reports the latest doping charge as recently as 19 February 2015. The licensed trainer of the affected dog was charged after his dog tested positive to the prohibited substance, methylprednisolone.<sup>xxviii</sup>

## 2.5 Live baiting

Investigations conducted by Animals Australia and Animal Liberation Queensland reveal that **live baiting is an accepted and routine training method** for a significant number of greyhound trainers. Our investigations have implicated 70 individuals across Victoria, New South Wales and Queensland - including trainers and their employees - directly engaging in this illegal practice. Further, the investigation documented that twice this number were present at tracks where live baiting is conducted.

The evidence showed live piglets, possums and rabbits being tied to mechanical lures and flung around race tracks at high speed while being pursued and mauled by dogs. Injured animals were not put down by trainers, and instead, they continued using them for further training until the animal eventually died from their injuries. Live rabbits were also tied to leashes and used to stimulate dogs in the lead up to race days, with the dogs being encouraged to attack the animals.

### 2.5.1 Evidence in Queensland

Surveillance cameras were used at a greyhound trial track at Churchable, near Gatton in Queensland. The evidence showed:

- 42 trainers and staff participating in live baiting and numerous others watching.
- Piglets, possums and rabbits tied to a mechanical lure; chased, mauled and killed.
- Trainers bringing their dogs to the track; they pay \$5 for a normal lure, \$10 for a live animal and it's free for people who bring their own live animals.
- In one incident, a possum has her baby pulled from her back then is tied to the lure. She is left on the lure for nearly an hour as dogs chase and rip her to pieces.

- In other incidents live piglets are tied to the lure and flung around the circuit many times, with dogs chasing and ripping at them while the animals scream in terror.

RSPCA and Qld Police raided the property in early February 2015 acting on the evidence (above) provided, and found live animals at the track. Admissions were made from some present at the track. Suspensions by Racing Queensland subsequently occurred and action continues in terms of show cause notices and life bans. Racing Queensland acting on information they received also inspected and suspended a second trainer at that time.

The suffering of animals used in live baiting is extreme - both in terms of associated terror and the direct physical trauma suffered through being mauled.

Evidence gathered in these investigations should only be considered as a 'snapshot' of the likely extent of live baiting nationally. By the number of people present during these activities, and due to the numerous 'tip-offs' received by Animals Australia, RSPCAs and other authorities since the *Four Corners* program aired, it is clear that there is widespread industry knowledge and acceptance of live baiting within the industry in Australia.

It is also pertinent to relay that in Queensland a recent review<sup>xxix</sup> of the 'catching pen' arrangements brought into question (through its recommendations) whether Racing Queensland (RQL) was in fact encouraging live animal lure training. An extract from that report stated:

*In particular, RQL intends to have significant upgrades made to the lures used at Ipswich and Albion Park. Work will be undertaken in conjunction with industry participants with a view to a more realistic lure being used, reducing the height of the lure and adding an effective noise maker in an attempt to encourage greyhounds to chase harder.*

*The RQL board also decided to amend the Local Rules of greyhound racing to allow clubs to conduct "muzzle off" trials in certain circumstances.*

...

The specific measures adopted or considered by the RQL Board are as follows:

#### *1. Lure*

*In an attempt to reduce the level of marring/failure to pursue the current lure at Albion Park and Ipswich will be replaced with a lure that better resembles a hare/rabbit which is suspended closer to the ground. The lure should have some bright colour around it and importantly have a loud and effective noise maker attached. The development and introduction of the lure, presumably similar to that which has proven effective and popular in Victoria, will be undertaken in consultation with industry participants and will be the subject of extensive trialling.*

#### *2. Lure in the catching pen*

*Further work be undertaken with a view to having a squeaker or some form of encouragement in the catching pen to encourage greyhounds to move towards the back of the pen and not run back towards the field at the conclusion of a race. Such work will also be undertaken in consultation with industry participants.*

### 2.5.2 Legislation

The evidence showed serious breaches of state-based animal welfare legislation and criminal codes, as well as relevant legislation protecting wildlife in each state.

In addition to live baiting being illegal, in most states it is also illegal to have live small animals on a property that is used for training greyhounds. There are also industry rules prohibiting live baiting in some states (e.g. in Victoria a trainer/owner found guilty of live baiting receive a 10 year de-registration from the industry<sup>xxx</sup>).

Despite laws and regulations, mounting investigations and prosecutions has been near impossible, as the RSPCA explained to the NSW Select Parliamentary Inquiry into the greyhound industry in 2013/14.<sup>xxxi</sup> One key challenge is that training occurs on private premises and random inspections by industry or other authorities are rare.

It is understood that Greyhound Australasia will introduce a new national industry rules to '*mandate the use of artificial or synthetic lures, at any place or time in the training, education or preparation to race of any greyhound*'.<sup>xxxii</sup> This move follows similar Rules introduced by Victoria and Queensland since the airing of the *Four Corners* program and thus outlawing the use of even dead animals/carcasses to train and trial greyhounds.

## 2.6 Greyhound industry animal welfare initiatives

Greyhounds Australasia (GA) has a comprehensive statement on its website<sup>xxxiii</sup> setting out the changes made over recent years in acknowledgment of the greater community concern about their sport. Each state racing authority has similar material – though in most cases (other than GRV and GRNSW) it is comprised primarily of details of their industry adoption programs (GAPs).

In May 2014<sup>xxxiv</sup> GA adopted a national animal welfare strategy<sup>xxxv</sup> (similar had been jointly developed by GRV and GRNSW in February 2014). Key elements of the Strategy are as follows:

- Higher levels of education for trainers and breeders including a requirement for all new participants to be assessed on core competencies before obtaining or upgrading a licence.
- Tighter breeding regulation controls and the promotion of more responsible breeding practices.
- A requirement for all greyhounds to be under the care of a registered participant at all times during their lifecycle, unless retired as a pet.
- Improved inspection and compliance requirements on greyhound properties.
- A star rating system to be introduced for all greyhound facilities at which greyhounds are housed during their lifecycle.
- A tiered trainer licence system which will stipulate how many greyhounds a trainer can train.
- Ongoing enhancements to each of the state's Greyhound Adoption Programs to maximise the re-homing opportunities for retired greyhounds.

A Greyhound Welfare Working Party will oversee the implementation of the strategy. In July 2014, a new Chair of the Working Party was appointed – '*prominent greyhound administrator, owner and breeder Mr Steve Hawkins*'.<sup>xxxvi</sup> It is of concern that this person is from the industry rather than being an independent person.



Several new GA initiatives under the strategy were out for comment until 15 January 2015, with a view to being introduced on 1/7/2015. The Rule changes related to this are set out,<sup>xxxvii</sup> and so far include new Breeding Rules<sup>xxxviii</sup> and a new Vaccination Requirement.<sup>xxxix</sup> The vaccination issue is primarily a health issue, and would bring industry practices into line with state dog boarding and other codes – the primary change is requiring vaccinations go from the current C3 to C5 vaccination (increased protection). The breeding changes are very disappointing for the reasons set out in 4.1 below.

The GA Strategy sets out the basic needs of greyhounds and condemns live baiting and the export of greyhounds to countries without sufficient animal welfare regulations and other matters.

In response, RSPCA Australia has indicated the GA Welfare Strategy has considerable flaws:

*The strategy does not address the key welfare issues associated with current breeding, rearing, kennelling and training practices. The strategy should directly acknowledge and address the lack of socialisation, environmental enrichment, human handling and habituation inherent in current practices. Significant changes to the way in which greyhounds are bred, reared, trained and housed must occur to improve welfare and performance and hence reduce wastage, overbreeding and euthanasia.*

RSPCA's response regarding the welfare needs of greyhounds at all life stages in more detail was provided to the NSW enquiry.<sup>xi</sup>

## 2.7 Codes of Practice

Most greyhounds lead a life of deprivation. When they are not racing, they are kept in small pens lacking stimulation and socialisation. Greyhounds are no different to any other dog. They want to play, to be part of a family, to give and receive attention and affection like any other dog.

The state greyhound authorities have a number of welfare codes, though most have been developed 'in-house' without government or animal welfare organisation input. They are for the main part, not legally enforceable and instead provide guidance to minimum expected standards.

The code for greyhound establishments in Victoria is enforceable under the *Domestic Animals Act 1994*, and since 2010, GRV has required compliance with minimum standards under their own industry rules, and serious offences can attract de-registration of trainers/owners.<sup>xii</sup> In other states this is not evident. However, most of the codes (whether enforceable or not) in regard to housing and socialisation, enrichment and exercise, provide a very minimum standard of care. For example, most codes only require exercise outside small kennels (2.4 – 3sqm) of 2 periods of 10 minutes a day. Others allow walking machines or rotary walkers which pose significant welfare risks to the dogs.

Concern has also been raised with regard to the raising of greyhound pups at some rearing properties, as dogs live in large barren runs or paddocks (with several other litter mates) with little enrichment, socialisation or handling until they go into training in their second year.

Some recently reported studies indicate significant concern for the welfare and performance of the dogs as a result of such methods of raising pups, in addition to the kennel environment and husbandry of adult dogs in the industry. For example, *Dr Karen Dawson* writes that paddock rearing of young greyhounds increases their fear issues, with the stress of subsequent kennelling not often observable. That is, sometimes the 'good' dogs that have no behavioural signs are the 'ones suffering the most'.<sup>xiii</sup> Dr Dawson advises that the fear issues occur in the young dogs due to a lack of social attachment, the novel environment, and because they have no control over their environment, which is also often noisy.

Fear in dogs can be avoided or reduced by socialisation and habituation. Dr Dawson uses the example of military dogs and guide dog programs which rely heavily on puppy walkers to raise dogs for their role in the community. She describes the paddock raising of greyhound pups akin to breeding and rearing them as commercial, 'even wild' animals, and at odds with then expecting them to be companion animals. Dr Dawson concludes that the prevalence of fear in many greyhounds has a severe effect on the ability to rehome them.

*Dr Peter Yore*, in his research regarding the 'all too common event' of kidney issues (which cause pain and reduced performance) in Australian racing greyhounds in 2012,<sup>xliii</sup> provides further insight into the inadequate environment of racing kennels. He advised that factors which may lead to kidney problems include the stress of kennelling, the long periods of kennelling, low frequency of dogs being let out to urinate (inadequate flushing), strenuous exercise, large muscle mass, high protein diets (meaning the kidneys having to work harder to remove waste) and hypertension.

### 3 REGULATION AND INSPECTION OF TRAINERS PREMISES

Australia's greyhound racing industry is largely self-regulated with peak bodies in each state governing the rules of racing. There is minimal (if any) government oversight. A racing review in Victoria in 2008<sup>xliv</sup> found links to criminal activity and noted the conflict of interest, whereby the state controlling body responsible for the promotion and operation of the industry was also responsible for integrity assurances. It is not credible to claim such conflicts only occur in Victoria.

In Queensland the RQL inspection rate of licensed persons/premises is low.<sup>xlv</sup> In 2013, 69 inspections were undertaken by Racing Queensland officers of the registered 959 trainers, thus an inspection rate of 7%. In 2014, there were 31 inspections conducted of some 916 trainer properties – an inspection rate of 3.4%. Under FOI (requested by Animal Liberation Qld) two inspection reports from 2014 noted animal traps found on premises – both were seized by the RQL inspectors and the explanations of the registered trainers accepted (copies of reports available from Animals Australia).

It is now evident (as has been suspected for decades) that live baiting occurs frequently but it was not detected by RQL inspections or through its own investigations. Inspectors under the *Queensland Animal Care and Protection Act 2001* must therefore now be provided with additional powers of entry and resources to undertake regular random and unannounced inspections to ensure animal welfare standards are maintained in the husbandry, housing and training of greyhounds.

A full review of the Act must be undertaken to assist the detection of illegal activities and to strengthen the current laws in relation to these matters.

### 4 GOVERNMENT FUNDING

State governments across Australia provide millions of dollars each year to the greyhound racing industry – actively encouraging growth and participation through breeding incentives, appearance fees, infrastructure and race-day attraction grants and even prize money.

In Queensland, \$1.2 million is being provided over four years in appearance fees,<sup>xlvi</sup> and \$12 million in state government funding has been committed for the construction a new greyhound race track at Logan, near Brisbane<sup>xlvii</sup> (the development of which has been put on hold until the conclusion of this Inquiry). It should be noted that the Logan community, including the local council, has vehemently opposed the construction of this track.

## 5 APPEARANCE MONEY (also called 'starters fees' or 'unplaced money')

Greyhound owners and trainers are financially assisted through the payment of fees for a dog entering a race. This payment is usually paid in cash before they start a race. The starters fees vary from relatively low per race in Tasmania (\$10) and South Australia, to a usual \$50 to \$100, and higher for some big races. In 2014, the rate was \$40 per starter at each of Queensland's seven greyhound tracks.

RQL has been provided with Government funding<sup>xlviii</sup> specifically to pay 'appearance money' in order to encourage greyhound owners/trainers. The Government investment was for \$1.2M in 2014<sup>xlix</sup>.

## 6 PRIZE MONEY

Some 45,000 greyhound races occur in Australia each year at 77 tracks around the country. Races are held every day except Christmas Day and Good Friday. Over 5,000 races are held each year in Queensland.

Successful trainers and breeders can earn well in excess of \$1 million each year. Feature races now routinely offer more than \$350,000 to the winning dog. Typical first-place prize money for a novice dog is \$5000 at city tracks. If the dog shows potential, it graduates to Group 3 races (prize money of about \$25,000), Group 2 races (prize money of \$30,000 to \$70,000), then, for elite performers, Group 1 feature races.

In Queensland, whilst the number of 'starters' and races has trended (slightly) down over the past decade, total prize money has increased from some \$6M in 2003 to over \$10M in 2013.<sup>l</sup> Such high rewards, with the added bonuses of QGreys, provides significant incentive for breeders/owners to breed high numbers of dogs and to seek any advantages available – legal or otherwise, including live baiting.

## 7 RACING INTEGRITY

There is little doubt that significant prize money and financial incentives on offer in combination with minimal regulatory oversight has led to trainers engaging in illegal practices to gain a winning advantage.

Victoria's leading trainer, Jenny Hunt (the daughter of suspended Hall of Fame trainer Graeme Bates), last month had a greyhound test positive to amphetamines and methamphetamines. This trainer earned well over \$1 million in prize money last year. In WA, Linda Britton, of the famous Victorian greyhound training family dynasty, was named 'Trainer of the Year', despite being suspended for 18 months for drugging offences. She was not permitted to attend the function to receive the top accolade of the industry, but it was awarded to her nonetheless.

Three of the greyhounds nominated in Victoria's Greyhound of the Year awards which were to be held on Friday 20<sup>th</sup> February 2014 (but were cancelled), were trained by a leading trainer implicated in live baiting offences, Darren McDonald. Last year's NSW Trainer of the Year uses the services of a NSW 'breaker' implicated in live baiting offences and now suspended.

Leading veterinarians have indicated their concern that the use of drugs and other substances to alter the performance of racing greyhounds may have grave health consequences for the dogs to which they are administered.

## **8 GREYHOUND RACING INTERNATIONALLY**

Australia is one of only eight countries in the world with a commercial greyhound racing industry – Australia's is by far the biggest. However internationally, it is an industry in decline. The number of greyhounds registered to race in Australia has been declining since 2004 and this downward trend is mirrored worldwide. In the USA, greyhound racing is now illegal in 39 states, 28 of the 49 tracks have closed in the last decade and wagering has dramatically reduced.

## **9 REFERENCES**

See next page.

---

<sup>i</sup> <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/111> (Estimate based on litters registered – some 2,707 in 2013 by some 7-8 pups/litter)

<sup>ii</sup> Greyhound Racing Victoria provided under FOI on 6/2/15 Destination report data for 2008-2014 for NSW, Qld, SA, WA, Tas. Vic data is still the subject of FOI review. Answers to Victorian Greens Q 9013 in 2012 to the Victorian Parliament provided Victorian data

<sup>iii</sup> <http://vicmps.greens.org.au/content/q-9013-racing-greyhound-racing-victoria-%E2%80%94-animal-welfare>

<sup>iv</sup> [http://www.abc.net.au/reslib/201502/r1389469\\_19745650.pdf](http://www.abc.net.au/reslib/201502/r1389469_19745650.pdf) RV response to 4Corners 12 February 2015 – advised 66% of pups born in 2012 were ‘named’, but the question related to those that had raced, and that figure for 2012 was 55% - from GRV-supplied ‘Destination Reports’

<sup>v</sup> <http://vicmps.greens.org.au/content/q-9013-racing-greyhound-racing-victoria-%E2%80%94-animal-welfare>

<sup>vi</sup> See the GA Breeding Standards explanatory notes, which show that very few bitches have more than 3 litters. <http://www.grv.org.au/wp-content/uploads/2014/12/Participant-Feedback-Form-National-Greyhound-Welfare-Strategy.pdf>

<sup>vii</sup> GRV provided under FOI on 6/2/15 Destination report data for 2008-2014 for NSW, Qld, SA, WA, Tas

<sup>viii</sup> Greyhound Racing Victoria provided under FOI to ALQ (February 2015), Destination report data for 2008-2014 for NSW, Qld, SA, WA, Tas, Vic, NZ

<sup>ix</sup> 2012/2013 Annual Report: [http://www.racingqueensland.com.au/HTML/RQ\\_Annual\\_Report.pdf](http://www.racingqueensland.com.au/HTML/RQ_Annual_Report.pdf)

<sup>x</sup> Answer to ABC *Four Corners* Feb 2015

<sup>xi</sup> [http://www.parliament.nsw.gov.au/Prod/Parlment/committee.nsf/0/7dee7c8f22acc503ca257c92001a6b72/\\$FILE/130206%20Greenhounds%20and%20other%20non%20GAP%20programs\\_Dr%20Karen%20Cunnington.PDF](http://www.parliament.nsw.gov.au/Prod/Parlment/committee.nsf/0/7dee7c8f22acc503ca257c92001a6b72/$FILE/130206%20Greenhounds%20and%20other%20non%20GAP%20programs_Dr%20Karen%20Cunnington.PDF)

<sup>xii</sup> <http://www.grv.org.au/wp-content/uploads/2014/12/Participant-Feedback-Form-National-Greyhound-Welfare-Strategy.pdf>

<sup>xiii</sup> <http://www.grv.org.au/wp-content/uploads/2014/12/Fact-Sheet-Breeding-Overall.pdf>

-

<sup>xiv</sup> <http://www.grv.org.au/wp-content/uploads/2014/12/Participant-Feedback-Form-National-Greyhound-Welfare-Strategy.pdf>

<sup>xv</sup> <http://www.grv.org.au/wp-content/uploads/2014/12/Participant-Feedback-Form-National-Greyhound-Welfare-Strategy.pdf>

---

<sup>xvi</sup> Human Society International, *Submission to NSW greyhound racing inquiry*, <http://www.hsi.org.au/editor/assets/2013-1018%20-%20HSI%20Submission%20on%20Inquiry%20into%20Greyhound%20Racing%20in%20NSW.pdf>

<sup>xvii</sup> See: <http://www.australianracinggreyhound.com/australian-greyhound-racing/administration/its-time-in-fact-its-overdue-that-bend-starts-should-go/60840>

<sup>xviii</sup> G.K. Sicard, K. Short and P.A. Manley; A Survey of injuries at five greyhound racing tracks. *Journal of Small Animal Practice* (1999) 40, 428-432.

<sup>xix</sup> Cave, N. Bone remodeling in racing Greyhounds. Proceedings of the Australian Greyhound Veterinarians Annual Conference, 2012.

<sup>xx</sup> <http://www.australianracinggreyhound.com/australian-greyhound-racing/administration/stewards-on-the-march/61959>

<sup>xxii</sup> McNicholl, J. Heat stress in Greyhounds in South Australia, Proceedings of the Australian Greyhound Veterinarians Annual Conference, 2012

<sup>xxiv</sup> Human Society International, *Submission to NSW greyhound racing inquiry*, <http://www.hsi.org.au/editor/assets/2013-1018%20-%20HSI%20Submission%20on%20Inquiry%20into%20Greyhound%20Racing%20in%20NSW.pdf>

<sup>xxv</sup> Sean Rubinzstein-Dunlop and Lesley Robinson, ABC 7.30 Report, Doping, cruelty and collusion claims dog greyhound racing industry, 15 October 2013, ABC 7.30 Report, <http://www.abc.net.au/7.30/content/2013/s3869813.htm>

<sup>xxvi</sup> Ibid

<sup>xxvii</sup> Ibid

<sup>xxviii</sup> <http://www.greyhoundracingqueensland.com/racing-news/5583/Stewards-Report---Trevor-Thompson---BILLY-ROSE-HI>

<sup>xxix</sup> <http://www.greyhoundracingqueensland.com/media/16536/catchingpenreview.pdf>

<sup>xxx</sup> <http://www.grv.org.au/news/2014/07/08/strict-penalty-guidelines-introduced-welfare-offences/>

<sup>xxxi</sup> Select Committee on Greyhound Racing in NSW) – Response to first report (April 2014 report), *Recommendation 17: That the NSW Government review section 21 of the Prevention of Cruelty to Animals Act 1979, to include 'kennels' to ensure allegations of live baiting can be properly investigated*

<sup>xxxii</sup> Statement to *The Project* Channel 10 on 5/3/2015.

<sup>xxxiii</sup> <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/188>

<sup>xxxiv</sup> <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/196>

---

xxxv

<http://www.galtd.org.au/GreyhoundsAustralasia/files/GA%20Greyhound%20Welfare%20Strategy.pdf>

xxxvi <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/198>

xxxvii

<http://www.galtd.org.au/GreyhoundsAustralasia/files/GA%20Participant%20Feedback%20Form.pdf>

xxxviii <http://www.grv.org.au/wp-content/uploads/2014/12/Fact-Sheet-Breeding-Overall.pdf>

xxxix <http://www.grv.org.au/wp-content/uploads/2014/12/Fact-Sheet-Vaccination-Changes.pdf>

xl

<http://www.parliament.nsw.gov.au/Prod/Parlment/committee.nsf/0/87E4F49B9629DB38CA257C94000E645E>

xli <http://www.grv.org.au/wp-content/uploads/2014/07/Animal-Welfare-Penalty-Guidelines-July-1-2014.pdf>

xlii Dr Karen Dawson's presentation to the 2014 meeting of the Australian Greyhound Veterinarians (conference proceedings).

xliii Dr Peter Yore, Kidney health in racing Greyhounds: Proceedings of the Australian Greyhound Veterinarians Annual Conference, 2012.

xliv Judge GD Lewis to Hulls, Victoria, 1 August 2008 re Integrity Assurance in Victoria's Racing Industry -

<http://www.justice.vic.gov.au/home/justice+system/laws+and+regulation/report+on+integrity+assurance+in+the+victorian+racing+industry>

xlv ALQ – FOI docs from Racing Queensland kennel inspections

xlvi <http://www.brisbanetimes.com.au/queensland/logan-to-get-new-greyhound-racing-track-at-expense-of-gold-coast-20140315-34tnw.html>

xlvii <http://www.brisbanetimes.com.au/queensland/logan-greyhound-track-draws-200strong-protest-20141011-114s1x.html>

xlviii [http://www.qgbota.com/news\\_around.htm](http://www.qgbota.com/news_around.htm)

xlix <http://statements.qld.gov.au/Statement/2014/3/15/new-greyhound-racing-track-at-logan-gets-green-light>

l <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/111>