



BRISBANE
RACING CLUB

27 January 2016

Agriculture and Environment Committee

aec@parliament.qld.gov.au

Dear Committee Members,

For your consideration, please find attached the Brisbane Racing Club's submission on the Racing Integrity Bill 2015.

The BRC thanks the Committee for the opportunity to lodge this submission. We request the opportunity to discuss our submission further at the public hearing in February.

Kind regards,

[REDACTED]

Neville Bell
Chairman
Brisbane Racing Club

EAGLE FARM & DOOMBEN

BRISBANE RACING CLUB LIMITED

PO Box 817 Hamilton Central, Queensland 4007. Administration Office: Eagle Farm Racecourse, 230 Lancaster Road, Ascot, Queensland 4007.
P: 61 7 3268 2171 • F: 61 7 3868 2410 • W: www.brc.com.au

ABN: 80 133 679 786 ACN: 133 679 786



B R I S B A N E
R A C I N G C L U B

Submission to the Agriculture and Environment Committee on the
Racing Integrity Bill 2015

Submitted by Brisbane Racing Club

Date: 27 January, 2016

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Introduction

The Brisbane Racing Club (BRC) was formed in July 2009. The BRC was the result of the merger of the Queensland Turf Club and the Brisbane Turf Club. The merger was the first of its kind for the Australian racing industry and was later replicated in Sydney.

The BRC is Queensland's most active race club with 98 race meetings conducted during every normal year. The meetings are divided between the BRC's two neighbouring courses – Eagle Farm and Doomben. These courses are the most popular in Queensland based on key metrics of crowd attendance and national wagering turnover. Both tracks generate more revenue for the state's racing industry than any other tracks.

In 2009, the BRC launched a concept master plan to fully realise the potential of the Eagle Farm and Doomben racetracks and surrounding land. The \$1.2 billion development is among the largest in the state's history and will ensure the future of the BRC – and strengthen the Queensland racing industry. The development will include residential, retail and entertainment areas around the racetracks and realise more than 4000 fulltime equivalent jobs once completed. Prior to this, almost 7000 fulltime equivalent jobs will be realised during the total construction phase.¹

The BRC has made this submission as the state's largest race club. This submission follows others made by the BRC in the last 12 months to the Greyhound Racing Commission of Inquiry and to Racing Queensland's *Tracking Towards Sustainability* process. During these submissions, the BRC has made it clear that it does not support the all codes model of racing administration adopted by the current and former state governments. The BRC does not believe this model has proven itself to be the most effective operation of the three codes. The distinction between the codes is most obvious in scale, reflected in the fact that Racing Queensland's most recent annual report shows that thoroughbred racing accounts for 75.2 per cent of all wagering revenues.² This fact, combined with the practical and cultural differences between the codes, means that thoroughbred racing warrants its own management structures and its own control body.

The weakness of the all codes model has been exposed by the appalling live baiting practices in the greyhound industry. These have had a catastrophic effect on racing administration. Live baiting is a welfare issue unique to the greyhound code. These events have impacted heavily – and without any reason – on thoroughbred and harness racing given the all codes model and the decision to subject the thoroughbred and harness codes to the same changes as the greyhound code. In effect, the two equine codes have become guilty by association.

¹ Brisbane Racing Club, <http://brc.com.au/masterplan/> 2015

² Racing Queensland, *Annual Report for Queensland All Codes Industry Board 2014-15*

The thoroughbred racing integrity model was never called into question during the greyhound live baiting crisis. However, the thoroughbred code is now facing significant changes forced upon it by the Greyhound Racing Commission of Inquiry. This inquiry and associated report produced no sound evidentiary or logical basis to determine – due solely to the live baiting scandal – that the **only** solution is an independent statutory body with oversight for integrity for all three codes of racing. This submission is made with that key observation in mind.

Method

The BRC has conducted extensive research for this submission including:

- Interviews with participants in other racing jurisdictions
- Interviews with officials from other sporting codes
- Research into the structures of commercial and integrity arms in other racing jurisdictions and other sporting codes, and
- Consideration of best-practice models to ensure appropriate independence of integrity functions from commercial decision-making

In this submission, the BRC will outline the results of this research. Importantly, the BRC submission also offers the opportunity to develop a more effective solution for racing's integrity measures.

The BRC has been grateful for the time provided to the Club by the current Minister for Racing and the Opposition Racing Spokesperson. Both have been generous in their time to meet with the BRC over Queensland's racing future. However, the BRC requests time to appear during the public hearings before the Parliamentary Agriculture and Environment Committee.

The changes proposed by the Racing Integrity Bill 2015

The Racing Integrity Bill 2015 would substantially alter the way in which Queensland's racing industry is administered. The Racing Integrity Bill proposes to completely and separate the commercial and integrity arms of Queensland's racing industry – a decision that would put the state out of step with most of the significant racing and sport administration models in Australasia. This submission outlines why other jurisdictions, bar Australia's smallest state racing jurisdiction, have avoided or abandoned the complete separation of their commercial and regulatory arms.

The Racing Integrity Bill 2015 follows closely the recommendations of the Greyhound Racing Commission of Inquiry that advised the State Government to separate the

commercial and regulatory arms. This Commission of Inquiry and its subsequent report occurred at a time when the live baiting practices of the greyhound industry were still front of mind for the general public. The racing industry and the general public were rightly appalled at the live baiting practices. The passing of time should enable these matters to be viewed again. Any review must take in the needs of the thoroughbred industry rather than solely the greyhound industry.

Under the changes proposed in the Bill, the newly created Queensland Racing Integrity Commission (QRIC) will be formed and headed by the Racing Integrity Commissioner (RIC). During the introduction of the Bill to Parliament in December 2015, the then Minister for Racing highlighted the “independence” of the QRIC. The proposed Racing Integrity Act 2015 should not be mistaken as the creation of an independent body. The Bill states:

s 13 (1): The Minister may give the commission a written direction about the performance of its functions or the exercise of its powers if the Minister is satisfied it is in the best interests of the Queensland racing industry to give the direction.

This power over the QRIC ensures ministerial control over the racing industry. For instance, the RIC’s powers include the oversight of appointments of the board of the control body.

The Bill also requires the QRIC to file quarterly reports to the Minister:

s 44 (a): The commission must keep the Minister reasonably informed of its operations, financial performance and financial position and its achievement of the objectives in its strategic and operational plans

Therefore the responsibility for the performance of the commission must rest with the Minister. This will include any integrity breaches. This is further evidenced by the sections regarding the strategic and operational planning:

s 49 (1 and 2): Before 31 March each year, the commission must prepare, and give to the Minister, a draft strategic plan and a draft operational plan for the next financial year. The commission and the Minister must try to reach agreement on the draft plans as soon as possible and, in any event, not later than the start of the financial year.

The Bill ensures that only the Minister can approve the operational and strategic plans for the commission. In circumstances where opinions and views may differ and therefore a conflict arises, only the Minister’s view will prevail. Therefore, the RIC is not an independent role.

Integrity measures in other Australasian racing jurisdictions

It is important to compare the changes suggested by the Racing Integrity Bill 2015 with the administration models in other Australasian racing jurisdictions. Noting that other jurisdictions, including Victoria, New South Wales and Tasmania have announced inquiries into the greyhound racing industry, the explanatory notes for the Bill includes the following claim as part of the section entitled *Consistency of legislation with other jurisdictions*:

These reviews and reforms are generally consistent with the proposed reforms to Queensland's legislative framework, including the separation of commercial and integrity matters and increased powers being provided to improve compliance and regulatory processes in the racing industry.

This claim is misleading as it purports to support the all codes basis of the Racing Integrity Bill 2015. While the New South Wales model of greyhound administration is being reviewed, it has no power over the thoroughbred industry.³ In Victoria, there is currently a major review of the integrity structures of Victorian racing being undertaken on behalf of the Minister. Based on the BRC's discussions with Victorian stakeholders, the initial findings of this independent review do not support the establishment of an independent statutory body for a variety of compelling reasons.

Additionally, as outlined later in this submission, there is no best-practice model in Australian sport that completely separates the commercial and integrity arms – not only by legislation but also physically locating the bodies in different buildings. Therefore, to suggest that other Australian racing jurisdictions will follow the Queensland model is incorrect.

The BRC has conducted its own research into Australasia's racing administrations:

Victoria

Victoria's racing administration has consistently been held up as Australia's most successful model over many years. The three codes of racing in Victoria are linked through a joint venture arrangement for the delivery of racing product and the distribution of income, but the codes are separated to ensure that thoroughbreds, harness and greyhounds have their own control bodies. Each control body combines the commercial and integrity arms. The current independent review has identified a number of 'behind the scenes' initiatives that are now being pursued jointly by the three codes. The BRC sees value in this approach.

³ New South Wales Government, *Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales*, May 2015

Victoria also has a Racing Integrity Commissioner (VRIC) appointed from the *Racing Legislation Amendment (Racing Integrity Assurance) Act 2009*. This legislation followed a 2008 review into Victoria's racing integrity measures, which recommended the creation of the VRIC but insisted that control bodies continue to deliver all integrity services and govern their codes. The VRIC has stand-alone, statutory powers. The VRIC can investigate complaints and refer them to the control bodies, make recommendations and also conduct audits and "own motion" inquiries regarding the control bodies.⁴

New South Wales

Like Victoria, New South Wales' racing administration is marked by separate control bodies that combine their commercial and integrity measures. Similar to Victoria, they have joint and linked obligations in terms of product delivery and funds distributions. The separation of control bodies with joint integrity and commercial oversight has changed in recent years as New South Wales moved away from a combined greyhound and harness racing control body (the former Greyhound and Harness Racing Regulatory Authority (GHRRA)) that did not have integrity oversight. This authority belonged to the State Government. In 2008, barrister Malcolm Scott looked into the greyhound and harness racing codes as part of a mandatory five-year review. Mr Scott recommended the disbanding of the GHRRA and its functions placed back beneath separate control bodies. Harness Racing NSW and Greyhound Racing NSW were given full responsibility for their commercial and regulatory functions.⁵

South Australia

South Australian racing also operates a model that enshrines separate control bodies for each of the codes. Thoroughbred Racing SA, Harness Racing South Australia and Greyhound Racing South Australia each oversee the commercial and regulatory functions of their codes.

Western Australia

Racing and Wagering Western Australia (RWWA) is a unique combination of a body that oversees off-course TAB wagering and the three racing codes including commercial and regulatory functions. RWWA began in 2003, assuming the authority of the Western Australian Turf Club, Western Australian Trotting Association and the Western Australian Greyhound Racing Authority. Each code has retained a different set of stewards who are able to share investigative functions.

Tasmania

Tasmania separated its commercial and integrity arms in 2004 via the *Racing Regulation Act 2004* and *TOTE Tasmania (Racing Regulation) Act 2004*. Under this legislation, the

⁴ Victorian Government, www.racingintegrity.vic.gov.au

⁵ New South Wales State Government, *2008 Independent Review of the Regulatory Oversight of the NSW Racing Industry*

Department of Infrastructure, Energy and Resources (DIER) were ultimately given responsibility for integrity issues while TOTE Tasmania kept control of commercial matters.

The integrity and commercial arms continue to be administered separately in 2016. The Office of Racing Integrity, through DIER, continues to control integrity while Tasracing oversees commercial elements.

New Zealand

Racing in New Zealand is coordinated by the New Zealand Racing Board (NZRB). The NZRB is also the monopoly wagering operator as it runs the TAB. Each code has its own control body which oversees the commercial aspects and delivers some of the integrity functions including the Rules of Racing, Licensing and other policy aspects. Separately, New Zealand has a Racing Integrity Unit (NZRIU) that is responsible for the delivery of integrity services across all codes. The NZRIU was formed in 2011, working alongside the Judicial Control Authority which conducts inquiries into integrity breaches. Importantly, the NZRIU is set up as an independent company and has four owners – each of the three racing codes and the NZRB. Each body owns 25 per cent of the NZRIU and provides one member each of the four-person NZRIU board.

Hong Kong

Hong Kong is regarded as the world's most successful international racing jurisdiction. Like Victoria, New South Wales and South Australia, Hong Kong's commercial (including the operations of wagering) and integrity arms are part of the same administrative body. The Hong Kong Jockey Club (HKJC) ensures appropriate governance mechanisms to enable commercial and integrity arms to work properly. The HKJC is directed by a 12-person Board of Stewards that oversees a management team headed by a Chief Executive Officer.

Malayan Racing Association

Singapore's racing is also highly regarded in the Asian region. The Singapore Turf Club is part of the Malayan Racing Association (MRA) which includes four turf clubs in two countries. Malaysia's Penang Turf Club, Perak Turf Club and Selangor Turf Club are also members of the MRA. Like most other jurisdictions, the MRA contains its commercial and integrity arms. The MRA sums up its approach to the commercial and integrity functions in this way:

The MRA's objective is to promote the interests of horse racing in Singapore and Malaysia through the uniformity of its Rules of Racing which are applied fairly and firmly and to ensure that the spirit and professionalism of the Sport of Kings are upheld ... MRA promulgates the rules of racing, sets the racing calendar, registers horses and horse owners, licenses trainers, jockeys and other racing

personnel for the two countries.⁶

Integrity measures in other Australian sporting codes

Australia's major sports do not seek to compartmentalise their commercial and integrity functions.

The BRC, through its researchers, has contacted each of the major sporting codes – the National Rugby League, Australian Football League, Cricket Australia, Australian Rugby Union and Football Federation Australia – to ascertain their approaches to integrity functions. In all of these major sports, there has been consideration of the appropriate governance structures required to ensure necessary independence of the integrity functions, to ensure they are appropriately funded and free of influence from commercial pressures. However, all of these sports also recognise the linked responsibilities to grow the sport, by having appropriate integrity functions to support the commercial development of the sport. Officials from these sports were interviewed and the models all reviewed and captured as part of the recent review undertaken for the Minister in Victoria.

In addition, the Australian Sports Commission (ASC) does not recommend that sports separate their integrity functions from the general governance and management of the sport. The ASC, responsible for the distribution of taxpayer funding for a range of national sports, provides best-practice governance advice to sports on how to manage conflicts and how to implement appropriate mechanisms to manage the full range of requirements of a national governing body.

Observations of the legislation

In this section, the BRC will set out its concerns about the Racing Integrity Bill 2015:

Using greyhound concerns to change thoroughbred integrity measures

As outlined earlier in this submission, the Racing Integrity Bill 2015 uses the fallout from a scandal that enveloped greyhound racing to make significant changes to the control of Queensland's thoroughbred racing industry. This scandal emerged in the embryonic days of this parliamentary term. The initial reaction was swift, as required, to deal with such serious animal welfare concerns. However, this speed did not allow for a rational assessment of the impact across the thoroughbred or harness industries.

⁶ Malayan Racing Association, <http://www.turfclub.com.sg/Industry/Pages/MalayanRacingAssociation.aspx>

The Greyhound Racing Commission of Inquiry Report did not undertake a satisfactory analysis of the integrity measures in other racing jurisdictions or other sports as highlighted in this submission. Such analysis would have assisted and better informed the State Government of important and crucial information that respectfully should have been undertaken prior to the implementation of the suggested model that provides for a one-size-fits-all solution. The Victorian review process undertook this analysis and over a longer consultation period.

The Report in its majority concentrates on the greyhound industry and its failings. Its very title suggests just that. It should be viewed in isolation. For the report to extend those failings to the thoroughbred industry in the absence of any integrity findings against this industry – or indeed any reasonable inquiry or analysis – is unjust. The Report’s conclusions and recommendations should not be relied upon as extending to the thoroughbred industry. The Report provides no justification for a change of such significance or level of disruption, nor does it provide a sound and proper basis for the implementation of the model as suggested in the Bill.

The absence of any obvious benefits

The failures that led to the proliferation of live baiting were failures of people and not failures of structure. The structures were in place to enable the detection of this horrid practice. The fact that it went undetected was due to human failings. There are no obvious benefits in the changes suggested by the Bill.

Control versus regulation

There is a significant distinction between control and regulation. The Racing Integrity Bill, through the measures afforded the Minister, sets out a *control* of the racing industry. However, the Bill is unclear as to *why* the industry must be controlled by the State Government rather than being regulated. The Bill as it is currently proposed, means that should an integrity issue arise under this proposed model, the Minister would have to assume full responsibility. This has been outlined earlier in this document in relation to the strategic and operational plans as written in the Bill. The RIC is not a truly independent role.

Additionally, the BRC believes it is anomalous – and arguably conflicting – for the QRIC to have the proposed powers to investigate complaints in respect of the control body integrity operations, make recommendations, conduct audits and “own motion” inquiries regarding the control bodies, yet at the same time be responsible for the delivery of integrity services for racing in Queensland. The Victorian model provides for independence of the VRIC from the day-to-day operations of integrity services. This has a much greater logic to it, and would ensure greater public confidence in the functions of the office of the QRIC, including making complaints to, or raising issues with, QRIC.

The dangers of separating commercial and integrity arms

There is good reason why all major Australasian racing jurisdictions and major sports, with the exception of Tasmania, combine their commercial and integrity functions. While New Zealand separates the functions, its commercial arm retains control over the integrity arm via the ownership and the make-up of its board. Importantly, the NZRIU serves as a shared-services model to the codes and is free of Government oversight and/or influence. It also has an integrated budget and business planning process that is linked to the codes and ensures significant code input.

Most importantly, the need for the highest integrity measures in thoroughbred racing is the most critical priority for the commercial arm. Without the perception of optimum integrity, the wagering community loses confidence, directly and negatively impacting revenues. The commercial and integrity arms are not mutually exclusive and, ideally, should be seeking the same long-term outcomes.

The Tasmanian experiment provides the best evidence of the dangers of separating the commercial and integrity arms. Tasmania has the most easily manageable state racing jurisdiction in the nation with nine tracks spread across three codes, racing for a combined \$18 million in annual prizemoney. However, the Tasmanian structure has become unworkable. A Tasmanian Government review committee in 2012 determined that “the separation of integrity, wagering and administration functions under separate organisations is largely inconsistent with the model in other jurisdictions and has created additional costs within the Tasmanian industry”⁷. The committee concluded:

There was no evidence that the separation of integrity and administration is necessary if an appropriate corporate governance framework is in place ... Efficiencies may be achieved through a merger of administrative and integrity services.⁸

The Tasmanian parliamentary committee received a written submission from Ross Kennedy, representing Victorian Commission for Gambling and Liquor Regulation, who noted that:

The benefits of separation are in perception. Often there is a perception that a particular decision was taken more because of the commercial imperatives than the integrity considerations in a matter and whether that is right or wrong, that can create some suspicion in the minds of the public and having them separate perhaps lessens that perception issue. Having them together means that there is a very broad understanding of the whole of the industry imperatives on the part of the commercial decision makers and those charged with the stewardship of the integrity of the industry so they can have regard to the total picture and not be limited to what they can see.

⁷ Parliament of Tasmania, *Inquiry into the Performance of Tasracing*, 2012

⁸ Ibid

Despite the committee's findings, the Tasmanian Government decided against adopting its recommendations. The Government continues to provide the integrity arm with \$3 million annual funding for an operation that is far smaller than the proposed QRIC model.

The BRC's interviews with Tasmanian racing experts and through the Club's own research found a dysfunctional structure unstabilised by legislative confusion, duplication and a lack of common sense. For instance:

- The commercial arm is responsible for field creation and handicapping for thoroughbreds. The integrity arm provides the same services for harness and greyhound codes.
- The commercial arm is not provided with access to the national greyhound database OzChase. The integrity arm controls this access, forcing the commercial arm to engage the help of other states for access to this fundamental resource.⁹
- Both the commercial and integrity arms have responsibility for welfare matters, creating unnecessary confusion. For instance, the legislation does not make clear which arm is responsible for abandoning a meeting should a welfare issue arise. This creates referrals to the Minister.
- Tasmania is often represented by two officials at discussions of national racing matters, often with conflicting objectives. Other jurisdictions have one representative and aligned objectives.¹⁰
- The commercial arm funds jockeys' safety matters such as workers' compensation matters. However, the integrity arm enforces these measures. The commercial arm bears the commercial risk of any enforcement problems.
- The compartmentalised structure has now been in place for six years but is confusing for stakeholders who remain unsure over which responsibilities rest with which arm.¹¹

The BRC understands that the current Victorian review has reached similar conclusions on the viability of the Tasmanian model.¹²

Cultural differences

The cultural differences in racing have long been an issue for the industry. The blending of control bodies, clubs, administrators, trainers, jockeys and owners makes the industry vibrant but it has also made for difficult negotiation in the past. The separation of the commercial and integrity arms adds an unnecessary layer to this mix of cultures.

⁹ Interview, December 2015

¹⁰ Ibid

¹¹ Ibid

¹² Interview, January 2016

New South Wales abandoned the compartmentalisation of harness and greyhound racing commercial and integrity arms in 2009. At the time, New South Wales officials were unaware of a scandal that was playing out in harness racing. The “green light scandal” involved stewards from the separated integrity arm taking bribes from harness racing drivers not to swab their horses. The practice would be revealed in 2011 and its observers attributed some of the blame to the cultural issues in the separation of the commercial and integrity arms. One official at the time, who wished to remain anonymous, told the BRC during its research for this submission:

The integrity staff were public servants who did not understand the intensity of the racing industry. They were not likely to be out of bed before daybreak, patrolling tracks to deter illegal practices. Instead, they worked to the normal hours of the public service and that was ineffective when it came to deterrence measures. In the end, the cultural differences were so great that the stewards lost all focus on the industry and lapsed into corruption.¹³

Harness Racing New South Wales’ (HRNSW) integrity practices have gained international prominence and recognition since they were again combined with the commercial arm. HRNSW uncovered the use of cobalt as a performance-enhancing substance. This discovery was made by one steward working in consultation with one vet. HRNSW discovered the problem and issued penalties that would later be approved by the Supreme Court of NSW during appeals by the penalised licensees. The work of HRNSW has been the base for the growing detection of cobalt in thoroughbred racing in Australia.

Costs

The Racing Integrity Bill 2015 does not provide enough clarity to determine the cost of establishing the QRIC. For instance, the onerous reporting requirements to the Minister add extra cost to the operation of the QRIC. This cost is of importance to the industry, which is already under serious funding pressure due to a series of factors in recent times. It is feasible to expect the QRIC staff will number at least 100 employees with additional costs ensuring a likely annual cost of at least \$15 million. While the State Government has been quoted in media reports as promising to fund the QRIC, the Bill ensures the costs will be the responsibility of control bodies:

s 56 (1-3): The cost of the performance of the commission’s functions is to be funded mainly by the control bodies. The chief executive must decide the amount a control body must pay from time to time towards the cost of the performance of the commission’s functions; and give the control body an invoice for the amount. The amount of the invoice is payable 28 days after the control body receives the invoice.

Additionally, the Bill is unclear as to the engagement with the racing industry in the

¹³ Interview, January 2016

development of the annual budget and business plan along with any integrity initiatives to be developed or pursued.

Alternative options

The BRC research has shown that while it is theoretically possible to separate the racing industry's commercial and integrity roles, the model is inefficient, impractical and ineffective. This is due to the need to involve both arms in the day-to-day running of the sport and in a wide range of commercial matters. The Racing Integrity Bill 2015 will create two bodies – separated by legislation and physical location – that should have the same common goal to grow public interest in the sport and grow the long-term financial viability of racing.

The experience in other racing jurisdictions and other sporting codes, as outlined in this document, shows that the Racing Integrity Bill 2015, in its current form, is dangerous for Queensland's thoroughbred racing industry. It is unlikely that Racing Victoria, Racing NSW, Cricket Australia, Australian Football League, National Rugby League, Australian Rugby Union and the Hong Kong Jockey Club, to name a few, are wrong to combine their commercial and integrity arms. Given that thoroughbred racing accounts for more than 75 per cent of the state's racing wagering revenues, the Bill is a high-risk approach to a specific greyhound racing problem. There is no similar issue or set of circumstances that have been shown to exist within thoroughbred integrity administration that warrants this level of disruption or potential disconnect of strategy and functions. This is a poorly justified, high-risk and unnecessarily disruptive approach to this specific greyhound welfare problem.

A new way forward

The BRC suggests the following measures to ensure the best outcomes for the thoroughbred industry to move forward:

- The highest priority is to establish an industry structure that will work and create optimum outcomes for racing.
- A period of at least six months during which the State Government must suspend all planned changes to integrity measures and initiate a review by an independent industry expert to advise the Government on an appropriate structure covering control bodies and integrity functions for the Queensland racing industry.
- The BRC supports the adoption of a shared-services model to support back-end systems, process and resources to provide the harness and greyhound integrity functions with the scale required to ensure best-practice systems. In this regard,

the BRC recognises the State Government's commitment to all three codes of racing in Queensland, and hence supports areas of shared services within integrity being identified to support all three codes into the future.

- Consideration of the establishment of an independent racing integrity commissioner with similar functions to the Victorian model
- The removal of control bodies from State Government control. The nature of Government operations imposes a process that limits the ability of industry boards to negotiate and develop outcomes necessary for the sustainability of the racing codes.
- The racing industry is not immune to the pace of disruptive change in today's workplace. The industry must be positioned to adjust to this change and to remain competitive and in sync with sponsors, national and international racing jurisdictions, staff skills and code specific issues. Control bodies need to be agile and equipped with industry knowledge.

To deal with the above points, the BRC recommends that the State Government seek external, specialist assistance in the area of racing integrity and administration. Much of this work has already been undertaken in Victoria, the leading state for racing in Australia.

Queensland needs to model its racing industry on successful interstate jurisdictions to retain relevance in the Australian racing community.

The BRC thanks the Agriculture and Environment Committee for the opportunity to provide this submission. The BRC looks forward to discussing this submission further at a public hearing.