

4th December 2020

NSW Select Committee on the Greyhound Welfare & Integrity Commission

Animal Care Australia (ACA) is a national incorporated association representing the interests of all animal hobbyists established to lobby for real animal welfare. ACA comprises of a broad range of pet and companion animal groups, recognising we are the real animal welfare experts - those who keep, care for and breed animals.

ACA strives to educate and clarify the differences between animal welfare and animal rights. The latter has no place in legislation or policy management with the keeping of pets, companion animals, animals used for educational/entertainment purposes or kept for conservation.

ACA notes the Terms of Reference of this Inquiry exceed the scope of animal welfare and accordingly we do not feel justified in responding to points (a) through (e) of the Terms Of Reference. In response to point (f), ACA makes the following recommendations:

Recommendation 1:

A greater emphasis on the rehabilitation and re-training of greyhounds for the purpose of re-homing is vital.

Recommendation 2:

Improvements to the training of assessors, greyhound owners and the training program are necessary to remove outdated and inappropriate methods.

Recommendation 3:

The Greyhound Welfare & Integrity Commission (GWIC) and Greyhound Racing NSW (GRNSW) must improve on communication within and between their organisations.

Recommendation 4:

Improvements to animal welfare standards must have greater key stakeholder consultation and involvement.

For further explanation please refer to the attached documentation.

Animal Care Australia finds there is room for improvement in reaching higher welfare standards within the keeping, racing and rehoming of greyhounds, however we support the GWIC and GRNSW in moving forward.

After all, the introduction of higher welfare standards and a more successful rehoming/rehabilitation program will not only improve the lives of greyhounds, but will see the keeping and racing of greyhounds continue.

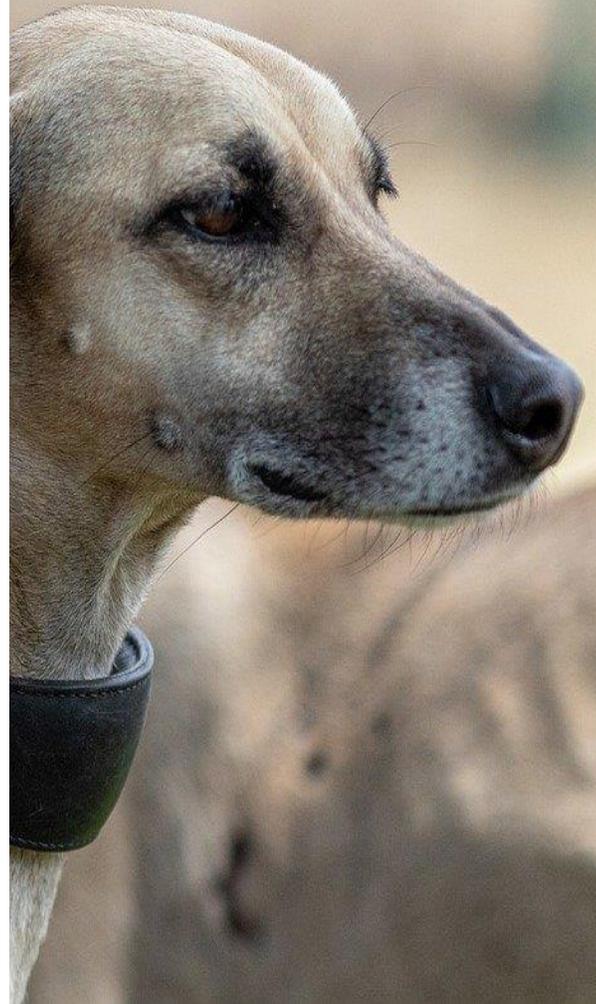
On behalf of the Animal Care Australia Committee,

Kind regards,



Michael Donnelly
President, Animal Care Australia.
0400 323 843

NSW Select Committee on the Greyhound Welfare & Integrity Commission 2020



DECEMBER 4 2020

**ANIMAL CARE AUSTRALIA
STAKEHOLDER SUBMISSION**

Select Committee on the Greyhound Welfare & Integrity Commission

As stated in our cover letter, as an animal welfare organisation Animal Care Australia (ACA) finds it appropriate to respond solely to point (f) of the Terms of Reference.

Terms of reference:

That a select committee be established to inquire into and report on the Greyhound Welfare and Integrity Commission (the Commission) as the independent regulator of the greyhound industry in New South Wales, and in particular:

(f) the actions, conduct and effectiveness of the Commission and GRNSW, in particular in relation to it's role in improving the welfare of greyhounds

As it currently stands, ACA finds there is room for improvement in improving the welfare of greyhounds by both the GWIC and GRNSW, in partiular in the area of rehabilitating, training and re-homing of greyhounds.

In June 2020 a social media petition focused our attention to the fact a Draft NSW Greyhound Welfare Code of Practice had been consulted on and that the Coalition for the Protection of Greyhounds was attempting to make further changes to the draft, in fact to throw out the draft, despite the consultation process having been completed.

By their own admission, the Coalition for the Protection of Greyhounds is actually a splinter group of the Animal Justice Party. ACA continues to be concerned when we see animal rights goals attached to serious animal welfare issues such as the drafting of an animal welfare Code of Practice. Animal Rights ideologies have no place in animal welfare practices and legislation.

Companion animals fall directly within ACA's purview, and in relation to the keeping, racing and re-homing of greyhounds we find it crucial to rely on other organisations, particularly those initiated by government to oversee the broader scope of greyhound racing, so that we can concentrate on the greyhounds that are retired or about to retire and ongoing attempts to re-train and re-home them. We feel that we can assist in ongoing consultations to ensure that the improved welfare of greyhounds and the measures required to implement this must remain as the primary outcome for all involved parties, including this Inquiry, without there being a distortion of issues to achieve irrelevant political goals.

Having reviewed the proposed draft, if we had been included in the consultation process, ACA would have made recommendations that would align some welfare-based sections such as housing, kennelling, resting, and the penalty terms for non-compliance from the NSW policy with those of *'Victoria State Government's Code of Practice for the Keeping of Racing Greyhounds – April 2018'*. For instance, we find it extraordinary that an Industry that has been the subject of public scrutiny and multiple investigations into poor animal welfare conditions, has been provided with a 'grace period' of ten years to implement and become compliant with the NSW Code of Practice. Surely this industry would be seeking to improve it's image and the implementation of higher welfare standards, sooner rather than later, would be something supported by all concerned.

The NSW Code of Practice is one element of concern for ACA however we also have major concerns with the current format of greyhound behavioural assessments, carried out primarily by rescue and shelter organisations – on a national scale. The current testing regime is outdated and requires a full review which should include key stakeholders. There are a number of issues relating to the re-homing of greyhounds in NSW, particularly focussed around the success/failure of behavioural assessments and also in the skill sets/training requirements of assessors.

It is our understanding the Greyhound Adoption Program (GAP) NSW utilise an assessment process initiated in Queensland by an individual who had strong association with the organisation known as Sentient, as well as with animal liberation/ rights groups such as Animal Liberation Queensland. It is also well known within the industry that during it's initiatiuon stage the GAP QLD program had the highest kill rates and lowest re-homing rates of that organisation's history.

The methods used within that process included:

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- utilising a child-sized doll that is walked towards the greyhound
 - utilising a small dog from afar (at first) and then slowly walked towards the greyhound (The breed often used is a barking breed to incite a response from the greyhound)
 - utilising a person dressed in a long coat and hat – again walking towards the greyhound

The reactionary responses rated are:

- Greyhound is scared and pulls away = FAIL
- Greyhound reacts with teeth barred = FAIL
- Greyhound sniffs low, wags tail and then backs away = FAIL
- Greyhound sniffs low, wags tail and stays = PASS
- Greyhound ignores the doll or man – seen as dismissive and non-interacting = FAIL

There is something severely wrong with an ‘assessment’ process that would FAIL 99% of all dogs reactions to the testing samples, let alone a racing dog with a natural sight-hound prey drive being tested at a racing track or at its place of training, without any allotment of time to allow for re-conditioning and preferably at a location away from that where it has previously been trained to ‘see’, ‘react’ and then ‘hunt’ a moving object presented within its line of sight. (A line of sight of 200m+)

In relation to GAP NSW we are aware that each branch is not adequately monitored and overseen for consistency or accountability. Assessors are trained on the job at various kennel locations and assessed on site by a GAP member trainer/assessor. Trainees are usually trained to how each individual trainer/assessor interprets and performs dog behaviour assessments and not necessarily in line with the required training documents that are deemed to be “current”. Each trainer has their own version of the behaviour assessment, which not only brings inconsistency and radical variance, but can greatly affect the outcome of a pass or fail rate. One dog may pass under one assessor but detrimentally fail under another mostly due to the approach of the process and how an assessment is conducted. Success and fail rates are not monitored on individual assessors performance evaluations by an overseer, to be able to determine where improvements could be made if an individual assessor has an unusually high fail rate compared to another who has a much higher success rate of passes.

It is also noted during the ‘small dog breed’ test, not all small breed dogs that assessors use are of suitable use in such an assessment. In fact it is often the case that many assessors will use small over reactive type breeds such as poodle cross types in which contribute to exciting the greyhound for it to inevitably fail. We are informed the majority of the small breed dogs used in such tests are not generally well socialised themselves and are unsuitable to be used in such extreme situations.

ACA acknowledges there is a recommended process for owners to follow for a pre-entry assessment test, which provides suggested periods of time for greyhounds to have stopped racing, introducing their dogs to other breeds of dog, and ensuring they are capable of being handled, walked on lead and familiarised with traveling in a car etc.

However, the preparation advice is not always put into practice. Dogs may be taken out of work for a minimum of 4-6 weeks and left to their own devices within their racing kennel. At this stage they become bored and very destructive with no replacement routine whilst still situated within a racing kennel environment.

The dogs are generally tested at one of two locations, depending on where GAP branches are located. Many are dog racing tracks, while some conduct their assessments on racing kennel grounds.

Keep in mind that it is recommended that the dog, pre-entry assessment, ideally should not be in racing mind set, and calm. Yes the dog may not be racing or in work, but it is still in its routine racing environment, leading to a lack of mental and physical stimulation, resulting in a more erratic dog.

If the assessment is at a race track, you then have a dog that has had no mental or physical stimulation while it is out of race work, but is still in its routine racing kennel environment. It is then loaded into its routine racing trailer or van to travel to the race track where the dog has inevitably being trained, trialed and raced. By this time, the dog is likely to be

overly-excited in anticipation, as it assumes it will be racing. The greyhound is abruptly introduced to a small fluffy breed of dog that is aggressively barking and zipping about similar to a rabbit or the lure used during racing.

The responsibility of the greyhound being prepped for such an assessment is generally placed with the trainer or owner of the greyhound, resulting in the majority of greyhounds still held in their racing kennel environments until assessment.

As you could well appreciate, none of this is ideal. Accordingly, ACA would like to see the removal of greyhounds from their racing habitat in entirety for the required pre-assessment duration and conditioning practices, as well as having the assessments take place away from race tracks and race kennels. This would provide greyhounds a fairer chance within the rehabilitation process, resulting in a greater success rate for placement into pet homes. This can happen through foster carer placement or within an off-site rehabilitation kennel facility where the greyhounds can settle into a replacement non-racing routine away from any racing related stimuli.

We would like to see the other dog breeds used in the greyhound assessment process also trained, tested and qualified to be deemed appropriate for use in such a test. This too will benefit the life outcome of a greyhound.

In summary, ACA has brought these concerns to the attention of both the Greyhound Welfare & Integrity Commission and Greyhound Racing NSW.

We received an immediate and supportive response from the GWIC's (then) CEO, Judy Lind, who suggested "You may not be aware that the Commission has in place an Animal Welfare Committee (AWC), ... an opportunity exists for this committee to oversight the development of an enhanced behavioural assessment model, with input from your organisation."

Unfortunately, we cannot state that we received the same supportive response from GRNSW to Judy's suggestion. In fact, no response has been received in relation to her correspondence.

ACA President, Michael Donnelly did have an opportunity to meet with GRNSW CEO Wayne Billett to highlight our concerns and request that our two organisations should work together to ensure the best outcome for retiring greyhounds. To date, Mr Billett has requested ACA follow this matter up with Greyhound Australasia rather than following the proposed opportunity to consult via the GRNSW Animal Welfare Committee. To date, nothing further has eventuated from Greyhounds Australasia or GRNSW, and accordingly from our perspective the GWIC appears to hold a higher level of commitment to improving the welfare of greyhounds than GRNSW.

However, there appears to be a broad 'moat' between the two organisations, with minimal communication and collaboration which is resulting in a delaying of initiatives that would see the redevelopment of the training of assessors as well as the implementation of an improved rehabilitation program that would see a greater number of retiring greyhounds finding new homes as companion animals.

A strong recommendation for the outcome of this Inquiry would be to ensure the continuation of both organisations and the encouragement for them to collaborate with key stakeholders such as ACA, Hanrob, and others.

After all, the introduction of higher welfare standards and a more successful rehoming/rehabilitation program will not only improve the lives of greyhounds, but will see the keeping and racing of greyhounds continue.