



Stakeholder Submission



Draft NSW Greyhound Welfare Code of Practice

Prepared by Coalition for the Protection of Greyhounds

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End greyhound suffering



Draft NSW Greyhound Welfare Code of Practice

Document Control

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Preamble

The Coalition for the Protection of Greyhounds (CPG) maintains that the racing industry must institute whole of life care for animals, and the draft NSW Greyhound Welfare Code of Practice (draft NSW Code) should reflect this. The impetus for welfare and rehoming should also be the responsibility of the racing industry independently, without the need for external provision by voluntary rehoming groups. As such, our recommendations are indicative of measures required by the industry to remain independently sustainable. We also argue that welfare standards should be consistent at a national level, so comparisons to the more prescriptive *Victoria State Government Code of Practice for the Keeping of Racing Greyhounds, April 2018*¹ (Victorian Code), finalised April 2018, are made where appropriate.

Our suggested requirements to justify the social licence of racing are reflected in our comments on the proposed draft NSW Code. CPG thanks the Greyhound Welfare and Integrity Commission for the opportunity to provide comment on the draft NSW Code.

Where relevant, items which CPG would like to raise for discussion from the draft NSW Code are italicised, corresponding sections of the Victorian Code are underlined and indented, and CPG comments follow in blue text and indented.



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Part 1: Introduction

CPG would like to raise two items of concern in the introductory section of the draft NSW Code.

“This Code applies to all participants and greyhounds kept by them, regardless of whether or not the greyhound is being kept for the purpose of racing. This includes greyhounds that are retained by participants as a breeding dog or pet.”

This paragraph condemns greyhounds that are not required for racing to a life of confinement which would not be considered appropriate for other companion dogs. This is not acceptable as it is not in line with public opinion. Greyhounds not required for racing could live more than 15 years and must not be kept in conditions that apply to racing greyhounds, the majority of whom have a racing career of about 12 months. Separate standards are required for greyhounds not required for racing.

“Participants may delay compliance with Standard 5.8 of this Code, as far as it relates to construction: for up to ten years from the date that this Code comes into effect...”

This paragraph condemns greyhounds to live in sub-standard conditions for up to 10 years. This is not acceptable. The maximum period to upgrade facilities must be 12 months. The shift in community expectations of the greyhound industry is not a new occurrence; 10 years is an excessive period to bring facilities into line with what is deemed to be the welfare minimum.



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Part 2: Nutrition and Hydration

“2.4 *Food containers and food preparation areas must be kept clean and be disinfected regularly.*”

Victorian Code: “Food must be prepared in hygienic areas that are cleaned and disinfected after food is prepared.”

Increased specificity and prescriptiveness of Victorian Code should be implemented; draft NSW Code is unenforceable.

“2.6 *Fresh, clean drinking water must be available to greyhounds at all times, at a temperature that greyhounds will drink*

2.7 *Puppies must be provided with access to clean drinking water of an appropriate temperature from three weeks of age.*

2.8 *Water containers must be cleaned regularly.*”

Victorian Code: “Greyhounds must have access to a sufficient supply of fresh clean water at all times at the establishment, unless advised otherwise by a veterinary practitioner.

The recommended daily volume of water is approximately 50 millilitres of water per one kilogram of body weight (for example 1.5 litres per day for a 30 kg greyhound).

This amount may vary depending on any number of factors including health status, environmental temperature, amount of exercise, lactation status, water content of diet etc.

Young puppies, from three weeks of age, must be provided with access to water.

Water receptacles must hold sufficient water for the greyhound(s), be non-spillable and does not cause injury to the greyhounds.”

Increased specificity and prescriptiveness of Victorian Code should be implemented with regard to water volume and safety/function of water vessels.

“*Advisory Information:*

- *From the time they are fully weaned to the age of 16 weeks, puppies should be fed at least three times a day to sustain growth and optimal physical health.”*

Victorian Code: “Puppies from three weeks of age to weaning must be provided with appropriate food in a shallow food receptacle.”

Increased specificity and prescriptiveness of Victorian Code should be implemented with regard to shallowness of receptacles.

Victorian Code: “Food supply on site must ensure food is available for the animals in the case of an emergency event such as illness (for the Person in Charge), accident or large scale emergency.”

The draft NSW Code lacks any mention of an emergency food supply; this is a critical inclusion.



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Part 3: Health and Wellbeing

“3.9 *Medications, treatments, or supplements must be labelled clearly and kept in their original container or packaging.*”

Victorian Code: “All supplements and injectable substances must be individually labelled and kept in their original container or packaging. All supplements and injectable substances must be stored according to manufacturer’s directions and be easily identified.”

Increased specificity and prescriptiveness of Victorian Code should be implemented with regard to storage of substances in accordance with manufacturer’s directions. Currently, this is only stipulated for the storage of parasite control products in section 3.15.

“3.12 *Participants must ensure that all greyhounds in their care are vaccinated from the age of 6-8 weeks, and that vaccinations are kept up to date.*”

Victorian Code: “The Person in Charge must ensure that vaccination certificates, including dates of next treatment, details of the treatment required and a record of who administered the treatment, are signed by a veterinary practitioner at each vaccination.”

Increased specificity and prescriptiveness of Victorian Code should be implemented with regard to record keeping given the necessity of this documentation in the rehoming process.

“3.16 *Participants must monitor the dental health of all greyhounds in their care, and seek veterinary advice if the greyhound shows signs of dental disease.*”

CPG endorses the inclusion of specific dental health monitoring given the predilection of the breed towards development of dental disease, and the pain often associated with dental conditions. Increased specificity advisable: monitoring of dental health should be performed at least every three months.

“3.18 *Participants must ensure that their greyhound’s toenails are trimmed regularly.*”

Victorian Code: “All greyhounds must have their toenails checked and trimmed at a frequency that prevents overgrowth.”

Increased specificity and prescriptiveness of Victorian Code should be implemented with regard to ensuring toenails do not overgrow.

Victorian Code: “Injectable substances must be administered under the direction of a veterinary practitioner.”

The use of injectable substances is not specifically mentioned in the draft NSW Code; again, this should be brought into line with the Victorian Code, with the specification that injectable substances are to be administered under the direction of a veterinary practitioner.



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Part 4: Greyhound Breeding

“4.2 *A greyhound must not be bred from if it has been diagnosed by a veterinarian as having a heritable disease or defect, or there is a reason to believe that the greyhound has a heritable disease or defect.*”

Victorian Code: “All breeders must comply with POCTAA and the Code of Practice for the Responsible Breeding of Animals with Heritable Defects that Cause Disease.

It is strongly recommended that all breeding greyhounds are genetically tested for any heritable defect before being bred with, where an effective and reliable test is commercially available. It is also recommended that a greyhound should not breed if a heritable defect is detected or known, including heritable defects not listed under POCTAA.

If a Person in Charge or GRV registered owner (if not the Person in Charge) is notified that a greyhound sold by them has been diagnosed by a veterinary practitioner as having a heritable defect, the establishment’s Person in Charge or GRV registered owner (if not the Person in Charge) must stop breeding from that greyhound’s parents until:

- at least one of the parents has been tested for the heritable defect, if that parent is still used for breeding and an acceptable test is available. If an acceptable test is not available, a veterinary practitioner must assess at least one of the parents for the heritable defect
- other offspring of those parents still residing at the establishment have been tested for the heritable defect, where an acceptable test is available.

If one or both parents have the heritable defect, then that pair must not be mated in future and genetic counselling must be obtained from a veterinary practitioner before continuing to breed those greyhounds with other greyhounds.

If any offspring have the heritable defect, then the Person in Charge of those offspring must develop a sale or euthanasia plan in conjunction with a veterinary practitioner, and all details about the heritable defect and likely outcomes for the greyhounds must be fully disclosed to their GRV registered owners and any prospective purchasers.

Any greyhounds in the establishment who carry recessive genes for any heritable defect that causes a disease or defect must not be bred together.”

Increased specificity and prescriptiveness of Victorian Code should be implemented with regard to increased detail about heritable diseases, particularly with regard to developing a plan for any affected offspring in consultation with a veterinary practitioner.



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“4.12 *Surgical artificial insemination can only be performed by a veterinarian using general anaesthetic, with appropriate pain relief during and post-surgery.*”

Canine surgical artificial insemination is now a prohibited procedure in the United Kingdom, not being allowable under the *Animal Welfare Act 2006* and *The Mutilations (Permitted Procedures) (England) Regulations 2007*,^{2,3} nor is it endorsed in principle by the Australian Veterinary Association: “Surgical procedures performed on companion animals primarily to provide a convenience or benefit to humans are not supported or recommended.”⁴

The draft NSW Code should promote and stipulate a shift away from such an invasive procedure where an outcome can be achieved via alternative techniques. Ultimately, the procedure should be banned due to the adverse animal welfare outcome of elective surgery solely for human gain.

“4.13 *A pregnant greyhound must be moved to a whelping box at least three days prior to her estimated whelping date. The whelping box must be clean, safe, quiet, and separated from other greyhounds.*”

Victorian Code: “At least seven days before her due date, unless there is a likelihood of stress or injury, a pregnant greyhound must be moved to a whelping housing area that complies with this Code.

As soon as the greyhound shows signs of whelping, fresh bedding material must be provided and the female greyhound must be regularly monitored (in person or remotely) until whelping is complete.

If there are any abnormalities observed or concerns for the welfare of the female greyhound or puppies during the whelping process, the advice of a veterinary practitioner must be immediately sought.”

Increased specificity and prescriptiveness of Victorian Code should be implemented to bring recommendations into national congruity; the dam should be moved to a whelping area seven days prior to her due date, and supervision should be undertaken throughout the whelping process.

“4.14 *After whelping is complete, the dam and her puppies must be closely monitored to ensure the puppies are feeding normally and maternal acceptance has been firmly established.*”

Victorian Code: “After whelping is complete, the Person in Charge or other staff must:

- monitor the female greyhound and her puppies six hourly until the puppies are feeding and maternal acceptance has been firmly established
- conduct a puppy health check within 12 hours of whelping”

Increased specificity and prescriptiveness of Victorian Code should be implemented to bring recommendations into national congruity; specifically the enforceable ‘six hourly’ opposed to ‘regularly’, and post-whelping puppy health check. The seeking of veterinary advice if there are problems associated with the whelping process, as in the discussion of section 4.13, should also be stipulated.



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Victorian Code: “Male greyhounds must be at least 12 months of age prior to their first service.

A male greyhound must have a general health check by a veterinary practitioner prior to first service to determine whether the greyhound is suitable for breeding purposes. The Person in Charge must obtain a certificate from the veterinary practitioner to state that the greyhound, at the time of examination, was suitable to breed.”

“Female greyhounds must be at least 12 months of age prior to their first service.

A female greyhound must have a general health check by a veterinary practitioner:

- prior to first service to assess whether the greyhound is physically mature enough to breed, and
- within 8 weeks of whelping.

The Person in Charge must obtain a certificate from a veterinary practitioner to state that the greyhound, at the time of examination, is suitable to breed or healthy after whelping (as appropriate).

A female greyhound must:

- have no more than three litters in her lifetime, or
- be approved by a veterinary practitioner and GRV to breed beyond three litters to a maximum of five litters, and
- not have a third litter until the first litter are at least 18 months of age.”

“Whelping and lactating areas must:

- have access to natural daylight
- contain bedding that is soft, absorbent and easily disposed of or cleaned and disinfected when soiled
- be temperature controlled to protect greyhounds from extremes of temperature at all times (the recommended temperature range is between 16°C to 24°C)
- have raised sleeping areas to prevent draughts, while ensuring puppies cannot fall out and become injured or stranded.”

“It is important to provide a heat source for the puppies (e.g. 25 watt globe/lamp), particularly during colder weather, to ensure they can maintain their body temperature, because their internal temperature regulation does not work at this age. In warmer weather, it is important to provide an alternative cooler area for the female greyhound/mother.”

Increased specificity and prescriptiveness of Victorian Code should be implemented to bring recommendations into national congruity; many critically important health and welfare requirements are missing from the draft NSW Code.

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Part 5: Housing and Enrichment

5.1 Greyhound enclosures and perimeter fencing must be designed, constructed and maintained in a way to prevent injury or distress to greyhounds, and to prevent their escape.

5.2 All perimeter fences must be a minimum of 1.2m high, and must have a secure gate.

5.3 Any security measures installed in or around greyhound enclosures must not prevent easy access to greyhounds, or efficient removal of greyhounds in the event of an emergency.

Victorian Code: “There must be at least two barriers between greyhound(s) and escape from the establishment at all times, unless the greyhound(s) are under supervision.

Barriers must be:

- constructed in a manner to prevent greyhounds from injuring themselves, escaping from the establishment or digging out”

Requirement for double fencing to prevent escape as stipulated in the Victorian Code should be instituted.

5.4 Vehicles, caravans, portable crates and the crawl space under any dwelling must not be used as long-term housing for greyhounds.

The use of such inappropriate facilities should not be deemed suitable for the housing of greyhounds at all; it is not in line with public expectation or animal welfare standards.

5.8 Greyhounds must be housed in greyhound housing areas that meet the minimum size requirements outlined in Table 1.

Table 1: Minimum space requirements for greyhound housing areas

Minimum requirements for one greyhound			
Enclosure type	Minimum width	Minimum height	Total area
Pen (includes kennel)	1.2 metres	1.8 metres	3.0 m ² *
Pen (includes kennel) for greyhound registered for breeding	1.2 metres	1.8 metres	3.5m ²
Minimum requirements for two greyhounds			
Pen (includes kennel)	2.4 metres	1.8 metres	6m ²
Mating Greyhounds Pen	3 metres	1.8 metres	15m ²
Minimum requirements for whelping greyhounds			
Whelping Greyhounds Pen (includes kennel)			15m ²
Whelping greyhounds housing pen (includes kennel)	One dam and her litter of pups aged over 8 weeks require an additional 15m ² of space		30m ²

*This is consistent with Victoria, Western Australia and ACT



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Victorian Code: “If housing two greyhounds, minimum of 20 sqm is required.”

“If housing three greyhounds a minimum of 35 sqm is required.”

To ensure consistency between states; the 6m² requirement for two greyhounds should be brought up to 10m² in line with the Victorian Code. As greyhounds may also be kennelled in groups of three, the minimum requirements for this should also be stipulated in the draft NSW Code, and again, recommendations should be in line with the Victorian Code.

5.11 *Participants must regularly monitor any greyhounds that are tethered.*

Victorian Code: “Greyhounds may only be tethered for temporary, short-term restraint under supervision.

Greyhounds must not be permanently tethered or tethered as a form of long-term containment or housing at any time.”

Increased specificity and prescriptiveness of Victorian Code should be implemented; ‘regularly’ is an unenforceable term, and tethering is only appropriate with constant supervision as in the Victorian Code due to the inherent risks.

5.18 *Greyhound housing areas and bedding must be maintained in a clean, hygienic and safe condition at all times.*

Victorian Code: “The greyhound establishment must be clean and hygienic at all times.

The Person in Charge or staff at an establishment must:

- clean all pens and kennels used to house greyhounds at least once per day (or more often as required) by hosing or other appropriate means
- remove and dispose of all faeces, soiled bedding material and uneaten food before cleaning pens and kennels
- disinfect pens, using hospital or veterinary grade disinfectants no less than four times per year (or more often as required) and:
 - prior to the introduction of a new greyhound
 - prior to whelping
 - upon removal of the puppies
- clean equipment, gear and bedding, including coats and blankets, before they are used by a different dog. Bedding, coats and blankets must be cleaned no less than four times per year or more frequently if soiled.
- ensure all equipment, including watering, feeding receptacles and utensils are clean and free of food, mould, etc.
- disinfect watering and feeding utensils if the greyhound using them is diagnosed with a disease or internal parasite infection before they are used to feed or water another greyhound. Utensils must be rinsed after disinfection to avoid poisoning.
- disinfect enrichment toys when providing them to a different litter.



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Waste disposal must be in accordance with the requirements of the appropriate statutory authority.

Disinfectants must be used and stored in accordance with manufacturer's instructions.

Chemicals used for pest control must be commercially available, registered by the Australian Pesticides and Veterinary Medicines Authority and used and stored in accordance with the manufacturer's instructions.

Pest traps must be used in accordance with the POCTAA and its regulations.

Increased specificity and prescriptiveness of Victorian Code should be implemented to ensure enforceability and provide additional guidance.

5.21 *All premises where more than one greyhound is kept must include an isolation housing area for greyhounds suspected of having an infectious disease. Isolation housing may be provided off-site at a veterinary practice under a written agreement with that practice.*

5.22 *Isolation housing must be physically separated by an impervious barrier from other greyhound housing areas.*

Victorian Code: "Isolation housing at the establishment must be physically separated by an impervious barrier or a distance of at least 10 metres from other greyhound housing areas at the establishment.

Pen items, such as bedding materials, food and water utensils, enrichment items etc. from isolation areas must remain in those isolation areas and not be used in other areas of the establishment.

Drainage must not run from isolation areas to or through other greyhound housing areas.

Greyhounds in isolation must be:

- maintained in an area approved in the EHMP
- regularly monitored by the Person in Charge according to direction from a veterinary practitioner.

Greyhounds with injuries or illnesses that are not infectious must be separated, but not necessarily isolated, from other greyhounds if separation will reduce stress in the greyhound.

Increased specificity and prescriptiveness of Victorian Code should be implemented; more specific details included regarding isolation housing.

The Victorian Code also includes specific details regarding minimum requirements and welfare standards for:

- kennel roof height (must allow a greyhound to stand upright on its hind legs)
- toileting yards (minimum 5m² per dog, no more than four greyhounds to be toileted together at one time)
- exercise yards (at least 20m² with a minimum width of 4m², supervision required at all times when in use)



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- day yards (for extended unsupervised exercise, contain weatherproof area and raised bed)
- outdoor sleeping areas (at least 3m² weatherproof area including kennel with raised sleeping area)
- appropriate housing of dogs in pairs or groups
- daily cleaning
- drainage
- flooring

None of these attributes are specifically addressed in the draft NSW Code and should be included.

The draft NSW Code should also take the further step of encouraging housing of greyhounds in pairs or groups as routine due to the positive welfare effects associated with group housing social animals. Paired kennelling is already routine in the United Kingdom.⁵ A review into best practice for the socialisation of greyhounds in a racing context conducted by the Australian Working Dog Alliance found that:

“It is common practice for greyhounds in Australia to spend a significant period of their adult life under conditions of individual housing. This is unacceptable from an animal welfare standpoint. Dogs are highly social animals and single-housing eliminates their ability to demonstrate one of the Five Freedoms - Freedom to express normal behaviour: by providing sufficient space, proper facilities and company of the animal’s own kind. Co-housing of compatible dogs should be adopted as standard practice for greyhounds at all stages of their lifecycle.”⁵



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Part 6: Transporting Greyhounds

6.2 *Compartments and cages, when used for transporting greyhounds must be weatherproof, have adequate ventilation and be maintained at a comfortable temperature and level of humidity for greyhounds.*

Victorian Code: “All transport vehicles or trailers used to transport greyhounds must:

- protect greyhounds against extremes of temperature at all times (the recommended temperature range is between 16°C and 24°C), this may include the use of a rug or cooling jacket”

Increased specificity and prescriptiveness of Victorian Code regarding appropriate transport temperature should be implemented; ‘comfortable temperature’ is subjective and unenforceable.

6.3 *When using compartments or cages for transporting greyhounds, participants must:*

- *disinfect compartments/cages at least four times each year, or as otherwise necessary to maintain good hygiene.*

Disinfection of the compartment between dogs which are housed in separate areas in the facility should be promoted in order to reduce the risk of infectious disease spread.



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Part 7: Exercise, Socialisation and Enrichment

7.10 *Participants must have a written plan detailing how the Exercise, Socialisation and Enrichment standards in this Code will be met for each greyhound in their care.*

While too lengthy for direct inclusion in this document, the specific plans and requirements detailed in the Victorian Code should again be instituted (section 6.6, Table 1 of the Victorian Code). The Victorian Code acknowledges that specific socialisation is necessary at each canine life stage to provide greyhounds with quality of life and maximise positive retirement outcomes by building behavioural resilience. The emphasis on exposure to different types of people, strangers, other breeds of dog and other animals, different environments and ideal handling will result in lower stress, and more robust greyhounds both during their racing career and after retirement.

The prescriptiveness and informative nature of the Victorian Code will ensure that the written plan will meet the standards defined in the draft NSW Code.

The endorsement of double kennelling, as discussed in Part 5, should also be introduced for its positive effects on socialisation and enrichment. A 2012 United Kingdom study found that “The key issue identified as most affecting greyhound welfare was a lack of opportunities to socialise during rearing.”⁵



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Part 8: Training, trialling and racing

8.1 *All training facilities, trial tracks and equipment used in the training, trialling and racing of greyhounds must be appropriately constructed, maintained, and fit for purpose, and supervised at all times when being used.*

Victorian Code: “All training facilities must:

- be fully enclosed and constructed of materials that will not injure greyhounds or allow them to escape
- not have large dips or holes that may cause injury to a greyhound when running
- not be made of concrete or other materials that could injure the greyhound, such as wood, wire or rough scoria
- not be allowed to remain muddy or sufficiently dusty that the greyhounds suffer, or are likely to suffer, from respiratory or eye conditions
- be cleaned of any faeces after each greyhound is removed from the area
- be clear of any debris
- be drained to prevent pooling of liquids.

Slipping tracks and galloping runs used to train two greyhounds simultaneously must have a minimum width of 3.6 metres.

Any mechanical lures and lure cables must be kept in good working condition at all times. Animals or animal products must not be placed on the lure.

Greyhounds known to be incompatible with other greyhounds must be muzzled at all times while using training facilities.

Starting boxes, viewing cages and race day cages must:

- be constructed of materials that can be easily cleaned and disinfected
- be constructed of materials that will not injure the greyhound
- be kept in good working order at all times
- be cleaned daily or upon use.

Greyhounds in viewing or race day cages must:

- not spend more than four hours in the cage without the opportunity to toilet, unless under the direction of a GRV Steward
- have access to water as needed, unless under the direction of a GRV Steward
- be monitored for signs of distress
- be removed if they are showing any signs of stress.

Increased specificity and prescriptiveness of Victorian Code should be implemented; Victorian Code provides additional information and welfare considerations absent from the broad statement of the draft NSW Code.



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- 8.3 *Food rewards must not be attached to, or make up any part of, a lure used to entice greyhounds to chase.*

Victorian Code: Animals or animal products must not be placed on the lure.

Recommendations should be brought into line with the Victorian Code precluding the use of any animal product on the lure, in addition to food rewards specifically.

- 8.5 *Aversive devices or substances must not be used in the training of greyhounds, except where prescribed by a veterinarian.*

Aversive devices and substances are not consistent with the welfare principles of The Five Freedoms or Five Domains models of animal welfare,⁶ and should not be required with appropriate canine management. The use of aversive substances should be banned outright.

- 8.18 *Greyhounds must not participate in a race or trial if the ambient temperature at the race or trial track exceeds 38°C.*

The scientific evidence base shows a heightened risk of heat stress in racing greyhounds at temperatures of greater than 38°C due to the loss of the ability to appropriately thermoregulate.⁷ Risks and ill effects can occur at lower temperatures, with some risk from 31°C, and the threshold of being able to maintain thermal equilibrium at 36°C.⁷ On these grounds, while racing should be prohibited at 38°C and higher, allowances should also be included in the draft NSW Code to accommodate for the risk at lower environmental temperatures.

Steps should also be taken to reduce the congestion on track, which is correlated with incidence of injury.⁸ The University of Technology Sydney investigation into optimal greyhound track design for safety and welfare strongly recommended reduction of greyhounds from eight to six starts per race.⁸ This important welfare step should be reflected in the draft NSW Code.



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Part 9: Retirement and Preparation for Rehoming

9.2 *A greyhound that has ceased racing or training for racing must be provided with a 'wind down' period of at least 30 days before being rehomed. During this wind down period, the owner must ensure that:*

- *the greyhound is exposed to daily periods of isolation from other dogs and humans, starting with 30 minutes and gradually increasing to three to four hours in duration.*

The 'wind down' period should be specific to the resilience level of the greyhound. The 30 minutes starting point for an isolation period should be reduced if the dog is showing signs of behavioural distress, and built up from there as the greyhound learns coping skills.

The much more prescriptive and structured 'wind down' period of the Victorian Code should be included in the draft NSW Code. This will ensure greyhounds undergo a gradual and appropriate habituation to companion animal life, reducing the risk of dogs that fail to adapt and as such are unsuitable for retirement into a domestic home.

9.6 *A greyhound owner must make genuine attempts to rehome any greyhound that they do not wish to retain. If an owner is unable to rehome the greyhound privately, they must first seek the greyhound's admission to the Greyhounds As Pets (GAP) program. If the greyhound is not admitted to the GAP program, the owner must then:*

- *seek to rehome the greyhound through at least one other pet rescue or rehoming organisation; or*
- *seek the greyhound's admission to the GAP program a second time.*

It remains the position of CPG that healthy, well-adjusted dogs must not be euthanased. Paragraph 9.6 is consistent with the GWIC Rehoming Policy. However, this policy allows the euthanasia of healthy greyhounds because homes are not available for them. Under the principle of Extended Producer Responsibility, the greyhound racing and gambling industries must finance sufficient homes for all greyhounds not required for racing. This can be achieved by the establishment of privately operated greyhound sanctuaries with funds collected from the greyhound gambling industry via the Betting Tax Act 2001 going to the NSW Government which will then pass these funds to the sanctuary operators.

The surrender of dogs to municipal pounds should not be considered an appropriate rehoming option.



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9.13 *Where a greyhound is not suffering from an intractable condition or injury that causes significant pain or discomfort or a marked reduction in quality of life, the owner must meet minimum rehoming standards as detailed in 9.6 before considering euthanasia. If the owner has complied with the minimum rehoming standards, has been unable to rehome the greyhound and intends to have it euthanased, they must notify the Commission of this intention at least 10 business days before the greyhound is euthanased.*

Euthanasia must be restricted to those cases where a veterinarian certifies that the greyhound is suffering from an intractable condition or injury that causes significant pain or discomfort, or a marked reduction in quality of life, such that it is inhumane or would otherwise compromise the welfare of the greyhound to delay euthanasia.

9.14 *Euthanasia of a greyhound must only be performed using humane methods. Euthanasia of a greyhound may be performed by a person who is not a veterinarian only where the euthanasia is:*

- *necessary to relieve the animal's immediate suffering, and*
- *a veterinarian is unable to attend in a timely manner, or transporting the animal to a veterinarian would unreasonably prolong the animal's suffering; and,*
- *a veterinarian has been consulted.*

Methods of euthanasia which are allowable and recommended must be stipulated in the draft NSW Code.



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Extra Inclusions

A marked omission in the draft NSW Code is that there is no acknowledgement of the critical socialisation period of puppies; the period from three weeks to three months of age in which early behavioural experiences shape how the animal will be able to cope with novel experiences as an adult.⁹ The importance of this period and how it will impact long term rehoming outcomes must be acknowledged, as it is in the Victorian Code. While the ‘wind down’ period is also important, plans for gradual exposure to novel stimuli during the critical socialisation period must also be included to result in more positive retirement outcomes.⁵

The draft NSW Code does not address the topics of staffing, operation of the kennels or record keeping. The Victorian Code provides standards covering these areas. The draft NSW Code must include these topics.

Mandated training for industry participants should be considered and endorsed by the draft NSW Code. The lack of formalised education, in favour of the use of ‘word of mouth’, often antiquated, information related to greyhound husbandry, is acknowledged by the Australian Working Dog Alliance as a critical issue to the welfare of racing dogs,⁵ and participant education is acknowledged in the Victorian Code.

There are also some grammatical issues in the ‘Part 10: Definitions’ section which warrant correction.



Draft NSW Greyhound Welfare Code of Practice

References

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