# **Response to the draft NSW Greyhound Welfare Code of Practice**

## Response to Question 10. What standards of the Code would you like to see change and why?

**Part 1: Introduction, amendment required to following clause on page 4:** “*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*.”

**Why**: 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.

**Part 1: Introduction, amendment required to following clause on page 5:** “*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…*”

**Why**: 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.

**Part 5: Housing and Enrichment**: this entire section is far too general in nature and allows for interpretation by individuals that may not be in accordance with the intent of the Code. The entire section should be brought into line with the Victorian Code. Specific inclusions are:

* 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)
* 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

**Why:** 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* (as defined by the RSPCA) *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.”*.

**Part 8: Training, trialling and racing, amendment required to clause 8.18:** “*Greyhounds must not participate in a race or trial if the ambient temperature at the race or trial track exceeds 38°C*.”

**Why**: While 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, 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. (*McNicholl J, Howarth GS, Hazel SJ. Influence of the Environment on Body Temperature of Racing Greyhounds. Front Vet Sci 2016; 3:53*.)

On these grounds, while racing should be prohibited at 38°C and higher, allowances should also be included in the draft 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. 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. (*University of Technology Sydney. 2017. Identifying optimal greyhound track design for greyhound safety and welfare. Phase I Report Jan 2016 to 31 Dec 2016.*)

This important welfare step should be reflected in the draft NSW Code.

**Part 9: Retirement and Preparation for Rehoming, amendment required to clause 9.13:** “*Where a greyhound is not suffering from an intractable condition or injury … before the greyhound is euthanased*.”

**Why**: 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.