



THE DRAKE INQUIRY RECOMMENDATIONS

OVERVIEW OF THE NSW GOVERNMENT RESPONSE

COMPILED BY
THE COALITION FOR THE
PROTECTION OF GREYHOUNDS

DECEMBER 2025



Executive summary

An explosive report by the former chief vet of Greyhound Racing NSW rocked Australia in July 2024 with harrowing allegations of cruelty¹. There were also whistleblower reports about corruption, nepotism and animal abuse in greyhound racing.

The NSW Government could no longer ignore the extent of the cruelty and corruption and called for an inquiry into Greyhound Racing NSW. Almost 1,600 submissions were received by the taxpayer-funded Drake Inquiry (Inquiry) with 94% of them calling for an end to greyhound racing in NSW, despite this being outside the scope of the Inquiry.

Witnesses spoke of confused regulation, rehoming failures, no racetrack meeting minimum standards, dangerous tracks, animal abuse, and political interference.

The [Drake Inquiry Report](#) (Report) "*identified the need for a significant restructure of the industry*" and made 65 recommendations designed to address systemic failings across animal welfare, track standards, reporting, integrity, financial practices, workplace culture, and governance.

A weak and inadequate response

In its weak and inadequate response to the Report, the NSW Government rejected key recommendations including:

- Limits on the numbers of greyhounds bred each year
- Halting the export of retired greyhounds to the USA (or anywhere outside Australia) for rehoming
- The suspension of greyhound racing if minimum track standards are not met
- Establishment of independent bodies to oversee both GRNSW and the industry regulator GWIC

The government also made it clear that industry sustainability and profitability would continue to take priority over greyhound welfare. This was highlighted in the [GRNSW response](#) with CEO Steve Griffin stating "*We were really pleased that the Government has only accepted those recommendations where there's clear benefit to the sport ...*"

Griffin also praised the Government's rejection of recommendations including "*halting the US rehoming program, the introduction of breeding caps, oversight by an ongoing committee of Parliament, GWIC (the Greyhound Welfare & Integrity Commission) taking over the management of the Minimum Track Standards*".

By ignoring the scathing Report, the NSW Government has once again demonstrated their commitment to the racing industry at the expense of the dogs they sacrifice to the gambling industry.

¹ Brittan report [part 1](#) and [part 2](#), split into two parts due to size of file.

Introduction

Inquiry into Greyhound Racing NSW

In July 2024, the NSW Minister for Gaming and Racing David Harris MP appointed the Hon. Lea Drake as an Acting Commissioner of the Greyhound Welfare & Integrity Commission (GWIC) to conduct an inquiry into Greyhound Racing NSW.

The NSW Government stated that, *“The purpose of the Inquiry into GRNSW was to ensure a viable and sustainable greyhound racing industry in NSW, and the highest standards of integrity and animal welfare.”*

Acting Commissioner Drake states in the introduction to the Report that, *“The Inquiry was established in response to a Handover Report delivered by GRNSW’s immediate past Chief Veterinary Officer and other complaints across a broad spectrum of issues. I have identified many significant issues relating to GRNSW’s governance, management, welfare and culture.”*

The Inquiry was extensive and far-reaching, receiving 1,597 public submissions with 38 witnesses appearing during Inquiry hearings taking place over 31 sessions.

On 31 July 2025, after a number of extensions, Acting Commissioner Drake presented the [Report](#) to the Minister for Gaming and Racing.

The inadequate NSW Government response to the Drake Report

On 9 December 2025, the Report was publicly released by the NSW Government together with the [NSW Government’s response](#) (Response) to the Report’s findings and recommendations.

The Report is a comprehensive 722 page document with 65 recommendations relating to areas including *“governance, financial practices, greyhound welfare, rehoming programs, reporting accuracy, racecourse safety and workplace culture”*.²

In its 9 page Response, the NSW Government does not respond to the Report recommendations in the standard government response format³. This format requires that each recommendation is agreed, agreed with qualification, or not agreed, or similar such wording. The Response fails to adopt this format and does not refer directly to any specific Report recommendation by number or by providing the full text for context.

For examples of the standard government format, see [NSW Government response to the Greyhound Industry Reform Panel recommendations](#) and [Queensland Racing Review 2025 – Recommendations and Response Table](#).

² NSW Government, Department of Hospitality and Racing, *FAQs Drake Inquiry - December 2025*

³ <https://www.vic.gov.au/guidelines-written-submissions-and-responses-inquiries>

This lack of a structured approach has created ambiguity around the NSW Government's intention to implement the Report recommendations. It also forces viewers to guess the intent of the Response. Ultimately the Response undermines confidence in the NSW Government's commitment to undertake meaningful reform of the NSW greyhound racing industry.

GRNSW Operating Licence

The Response states that the "[GRNSW Operating Licence](#) is the key regulatory mechanism for the oversight of GRNSW and to hold it accountable to the Minister for its performance. "

Rather than addressing specific recommendations, on several occasions the Response states, "*The Minister will amend GRNSW's Operating Licence to hold GRNSW accountable for addressing key Report recommendations*" by "*applying a range of new and mandatory licence conditions*". This is followed by a summary of conditions with no direct reference to Report recommendations.

The Response also states that "*The Racing Minister has the power to amend, suspend or cancel the GRNSW Operating Licence if its conditions are not met.*" However, GRNSW has been allowed to continue operating despite it failing to meet the conditions of its current Operating Licence. These failings are identified in the Report and include *Function 10. Minimum Standards*, *Function 11. Rehoming* and *Function 12. Breeding*. For more information see Appendix 1.

To rectify this failure of legislative and public accountability, Recommendation 61 of the Report states, "*The Operating Licence should be made a part of the regulations under the Act so that it is a disallowable instrument and within the scope of Parliamentary review.*" This recommendation was not accepted by the NSW Government in the Response.

In addition, the Report also recommends:

"63. A new office of Greyhound Racing Industry Inspector should be established under the Act with functions similar to those of the Inspectors of the Independent Commission Against Corruption and the Law Enforcement Conduct Commission ..."; and

"64. A Committee of both houses of Parliament should be established under the Act, with powers regarding the calling of evidence, conduct of proceedings and confidentiality that are consistent with existing joint statutory committees of Parliament ...".

Neither recommendation is accepted by the NSW Government. See Recommendation 63 and 64 of the Report for the complete wording.

Ministerial Statement of Expectations issued to GWIC

The Report recommends that several functions under the GRNSW Operating License are transferred from GRNSW to GWIC. The NSW Government does not accept any of these recommendations, instead limiting GWIC's role to that of an advisor rather than a regulator.

A [Ministerial Statement of Expectations](#) (Statement) has been issued which outlines how GWIC will support GRNSW in this advisory capacity. This includes improving its reporting on those functions to be retained by GRNSW despite the Report recommending that these functions are transferred to GWIC.

Approach taken in this document

This document is not a review of the Report but is an attempt to identify the Report recommendations accepted by the NSW Government through a review of their Response.

The document provides a summary of key Report recommendations together with any implied NSW Government response if it can be identified. This is followed by a table listing specific Report recommendations and again including any NSW Government response where it can be identified. The document excludes recommendations that are not primarily concerned with greyhound welfare, see more below.

Where no direct or implied response to a recommendation can be identified, the recommendation is marked as **Undetermined**. **Partial** indicates that the NSW Government provided an implied response to only part of the recommendation. **Not accepted** is used where the NSW Government response has been [clarified by GRNSW](#).

CPG has taken the Statement into account when attempting to uncover whether a recommendation has been accepted. However, it should be noted that the Statement is not legally binding and there are no legally enforceable penalties associated with GWIC not meeting the Ministerial expectations.

The Coalition for the Protection of Greyhounds acknowledges that to provide our response in a structured format we have had to make some assumptions. CPG would appreciate any certainty the NSW Government can provide on which of the Report recommendations will be implemented as stated.

A copy of this document has been provided to the office of the NSW Gaming and Racing Minister David Harris.

An emphasis on greyhound welfare

This document focuses on those recommendations most concerned with greyhound welfare. This includes overbreeding, rehoming, minimum track safety standards, transparent and accurate reporting, increased regulation and oversight.

In line with this focus, Recommendation 65 of the Report states:

“The Act should be amended so that the objectives of the Act, of GWIC and of GRNSW (and any objectives introduced for the role of Inspector) give primacy to greyhound welfare ahead of all other objectives, consistent with the Terms of Reference in this Inquiry to ensure the greyhound racing industry operates with the highest standards of integrity and animal welfare.”

This recommendation has not been accepted by the NSW Government in their Response.

“The industry exists subject not only to legislation and an operating licence issued by the Minister, but a social licence that exists and shifts at the will of society at large. The volume of submissions to this Inquiry urging the closure of greyhound racing (which is beyond the scope of the Terms of Reference of the Inquiry) indicate how tenuous that social licence is, and that greyhound racing exists at the margins of social tolerance. For all these reasons, it is an industry that requires ongoing scrutiny.”

The Drake Report

Key recommendations

Note: As with the 65 Report recommendations, it was difficult to identify the NSW Government response to the greyhound welfare-related key recommendations included on page vii of the Report.

Steve Griffin, the CEO of Greyhound Racing NSW, has partially clarified the NSW Government response as follows:

“We are also pleased that the Government has not accepted those recommendations where there's not clear evidence in support of the recommendations such as halting the US rehoming program, the introduction of breeding caps, oversight by an ongoing committee of Parliament, GWIC (the Greyhound Welfare & Integrity Commission) taking over the management of the Minimum Track Standards ...”

Given this, **Not accepted** has been used to indicate these recommendations. **Undetermined** is used to indicate those recommendations where a direct or implied response cannot be identified.

Excerpts from the Report are formatted in italics.

Greyhound welfare reforms

The greyhound racing industry has improved its approach to welfare issues since the Special Commission of Inquiry in 2016, but a significant locus of concern is the meaningful rehoming of greyhounds after their racing life. Many greyhounds spend long periods in kennelling, and are not adopted ‘to a couch’, being a life as a companion animal in a new domestic setting.

Key welfare recommendations include:

<i>introducing an annual cap on the number of greyhounds bred in NSW, to a sustainable level that can be supported by domestic adoptions, so that greyhounds do not live out their lives after racing in kennels</i>	Not accepted
<i>the term ‘rehoming’ must only be used to refer to the common understanding of the concept of adoption—rehomed to a couch in a home, not to include long-term kennelling</i>	Accepted
<i>ending the export of retired greyhounds to the USA (or anywhere outside Australia) for rehoming, as there can be no meaningful oversight of exported greyhounds, it is distressing and sometimes fatal for the dogs, and it is financially prohibitive for GRNSW.</i>	Not accepted
<i>per track injury reporting should be published.</i>	Accepted

Fewer tracks with higher safety standards

<i>Minimum Track Standards must be resolved by 31 December 2025. If they are not resolved by this date greyhound racing must be suspended.</i>	Undetermined
<i>Minimum Track Standards must be implemented by 31 December 2026. If they are not implemented by this date greyhound racing must be suspended.</i>	Undetermined
<i>There are more tracks in NSW than can be maintained to the highest safety standards in a sustainable way. GRNSW must determine and implement a strategy by 31 December 2026 to determine the number of tracks in operation. Evidence before the Inquiry suggests that the appropriate number of tracks is no more than 14.</i>	Referred to GRNSW
<i>GWIC should be given the function of setting and enforcing minimum track standards for racecourse design and construction and racecourse facilities and amenities that concern greyhound welfare, greyhound training facilities and greyhound kennelling standards.</i>	Not accepted

Increased regulation and oversight

Accordingly, I recommend a new regulatory regime for greyhound racing that is consistent with current community expectations for transparency and accountability. It is designed to redress the fact that GRNSW is not presently subject to a range of legislation and policies that govern state-owned statutory corporations.

<i>GWIC should be given additional enforcement functions that place it squarely in the role of regulator of GRNSW and give it full responsibility for all matters affecting greyhound welfare. GRNSW should remain the commercial operator of greyhound racing in NSW. It should no longer have responsibility for setting and enforcing minimum track standards. GWIC should set these standards and will also be required to set and enforce standards for greyhound rehoming facilities.</i>	Not accepted⁴
<i>A new statutory office of Greyhound Racing Industry Inspector should oversee both GRNSW and GWIC. The Inspector would hold functions and powers similar to those of the Inspectors of the Independent Commission Against Corruption and the Law Enforcement Conduct Commission. This will enable swift investigation of complaints and a clear avenue for identifying and reporting issues as they arise.</i>	Not accepted⁴

A new Statutory Parliamentary Committee should be established with powers and functions consistent with existing joint statutory committees of Parliament. This will deliver the ongoing transparency and accountability required for the greyhound racing industry to maintain its social licence with all stakeholders. The Parliamentary Committee would monitor and review the exercise of functions by GRNSW, GWIC and the Inspector.

Not accepted⁴

⁴ The Response states “While the NSW Government notes the Report’s recommendations related to industry oversight, it considers that the current legislative and regulatory framework for greyhound racing in NSW is fit for purpose and in line with regulatory best practice.” Given this and the statement by Steve Griffin, CEO GRNSW that, “We are also pleased that the Government has not accepted those recommendations” including “GWIC (the Greyhound Welfare & Integrity Commission) taking over the management of the Minimum Track Standards” and “oversight by an ongoing committee of Parliament”, these recommendations are marked as Not accepted.

Report recommendations with NSW Government response

This section attempts to identify the NSW Government response to greyhound welfare-related Report recommendations. These include overbreeding, rehoming, minimum track safety standards, transparent and accurate reporting, increased regulation and oversight.

Where no direct or implied response to a recommendation can be identified, the recommendation is marked as **Undetermined**.

Partial indicates that the NSW Government provided an implied response to only part of the recommendation. **Not accepted** is used where the NSW Government response has been [clarified by GRNSW](#).

Recommendations are formatted with blue shading.

1	Greyhounds should be recorded and reported as 'rehomed' only once they are adopted as a companion animal in a residential setting with a new ongoing owner (not a foster carer and not an industry participant) who has accepted responsibility for the greyhound and is registered as the greyhound's owner on the Companion Animals Register.	Accepted ⁵
2	It should be within the remit of GWIC rather than GRNSW to: a. define 'adoption', 'rehoming' and other related terms b. oversee, track and report on GRNSW's management of greyhound adoption programs.	Partial see 2*
	*2 Response and Statement indicate that sub-para a. of this recommendation is accepted. Response omits any reference to sub-para b. of this recommendation which states that it should be within the remit of GWIC rather than GRNSW to "oversee, track and report on GRNSW's management of greyhound adoption programs."	

⁵ While the Response omits any reference to this recommendation, details provided in the Statement indicate that this recommendation is accepted. Also included in the Statement is action to be taken by the Minister to ensure that this recommendation is fully implemented including: "The Minister for Gaming and Racing will consider amendments to GRNSW's Operating Licence to apply any newly established definitions for use across the greyhound racing industry to GRNSW."

- 3** The Minister should issue a Ministerial Statement of Expectations to GWIC to:
- a. conduct modelling and analysis to determine the maximum number of greyhounds required to be whelped each year, based on the following three factors:
 - i. the number of greyhounds already awaiting rehoming and the capacity for them to be rehomed in Australia (with particular priority to NSW) in the short term
 - ii. the number of greyhounds able to be adopted annually in Australia (and ideally in NSW)
 - iii. the number of dogs needed to sustain appropriate racing levels in NSW following the closure of tracks that do not meet minimum standards
 - b. set an annual cap on the number of greyhounds that may be whelped in NSW to reflect that analysis and modelling
 - c. administer the annual cap via a transparent allocation framework to distribute breeding entitlements among eligible breeders
 - d. monitor compliance of breeders and adjust the cap as necessary every two years.

**Partial
see 3***

***3** Response and Statement indicate a partial acceptance of this recommendation

The Response states GWIC is expected to *“provide a report to the Minister with evidence-based advice on the maximum number of greyhounds required to be whelped each year to support a sustainable racing industry”*.

Additional information is provided in the Statement. Significant omissions regarding sub-para a. include (bolding added for clarity):

- the capacity for greyhounds to be rehomed ***in Australia “with particular priority to NSW”***
- the number of greyhounds required to sustain appropriate racing levels should be determined ***following the closure of tracks that do not meet minimum standards***

There is no reference in either the Response or the Statement to sub-para b., c. and d. which recommend that GWIC should set, administer and monitor the compliance with an annual breeding cap.

“GWIC is expected to report to the Minister with this analysis and advice by 30 June 2026.”

4	<p>GWIC should publish annually, the number of greyhounds that:</p> <ul style="list-style-type: none"> a. have been successfully adopted (in the sense of being ‘rehomed to a couch’) <ul style="list-style-type: none"> i. via GAP ii. directly by participants to non-participants iii. via third party adoption agencies including another animal adoption or rescue organisation b. are in the process of being adopted or awaiting adoption via the GAP program c. have been returned after being initially adopted. 	Accepted ⁶
5	<p>The <i>Greyhound Racing Act 2017</i> should be amended so that ‘greyhound’ is defined to cover the entire life of the greyhound even if adopted to a non-industry participant and the <i>Greyhound Racing Regulation 2019</i> should be amended to require that after a greyhound is transferred onto the Companion Animal Register, the greyhound should remain on GWIC’s register, and be subject to the same annual eTrac check-ins as other registered greyhounds.</p>	Undetermined
6	<p>The Minister should amend GRNSW’s Operating Licence to prohibit the use of HAS statistics as a KPI for executive remuneration.</p>	Accepted

⁶ While the Response does not respond directly to this recommendation, additional details provided in the Statement indicate that it is accepted with the following proviso, “GWIC does not have jurisdiction to collect data from independent third-party rehoming organisations and is therefore expected to report on greyhounds provided to these organisations for adoption (e.g. by participants).”

GWIC is expected to investigate options for reporting and publishing annual statistics for third party adoption agencies and provide the Minister with detailed advice on the matter by 30 June 2026. Changes to rehoming definitions (Recommendation 1 and 2) and annual reporting (Recommendation 4) should be undertaken “as soon as practicable” with a view to them taking effect from FY2026-27 onwards.

7	<p>A mandatory rehoming contribution fee should be introduced and levied on participants prior to a greyhound commencing its racing career, such as at the point of litter registration, naming or another appropriate early stage, to ensure participants contribute significantly to the costs associated with preparing greyhounds for life after racing. This fee should be:</p> <ol style="list-style-type: none"> additional to existing registration and naming fees collected by GRNSW set at a level that realistically reflects the veterinary and other costs associated with rehoming directed into a dedicated fund for supporting the costs of rehoming and veterinary care under the GRNSW financial assistance schemes. 	Undetermined
8	<p>GWIC should engage a qualified animal welfare scientist to develop a minimum welfare standard for greyhound kennelling facilities and long-term off-site care arrangements, including 'farmstay' programs. This standard should be informed by the Five Domains model, with particular emphasis on the mental wellbeing, behavioural needs, environmental enrichment and opportunities for agency and natural behaviours.</p>	Undetermined⁷
9	<p>The Act should be amended to require GWIC to:</p> <ol style="list-style-type: none"> set minimum standards for greyhound rehoming facilities at a level comparable to the Londonderry facility at the time of this Report undertake and document an annual audit of all greyhound rehoming facilities or long-term kennelling facilities (whether operated by GRNSW or a third party), including assessment against the minimum standards. 	Undetermined

⁷ Both the Response and the Statement refer to this recommendation and expect GWIC to "develop and issue minimum welfare standards across greyhound kennelling facilities". However, both suggest GWIC should only "consider" engaging a qualified animal welfare scientist, and "consider" whether the standards should be informed by the Five Domains model. Given this, the recommendation is marked as Undetermined .

<p>10 Pending amendment of the Act, the Minister should issue a Statement of Expectations that GWIC will:</p> <ul style="list-style-type: none"> a. issue detailed standards for rehoming facilities such as Londonderry and other third-party facilities b. conduct annual inspections and audits of all GAP facilities in consultation with a qualified canine welfare scientist, including an evaluation of factors such as infrastructure maintenance, enrichment, and staff-to-dog ratios. 	<p>Undetermined⁸</p>
<p>11 GRNSW should expedite the establishment and operation of additional greyhound kennelling and rehoming facilities, appropriately distributed across the state.</p>	<p>Undetermined</p>
<p>12 The Minister should amend the Operating Licence to require GRNSW to report to GWIC all deaths of greyhounds under GAP's care in the following circumstances:</p> <ul style="list-style-type: none"> a. the greyhound died a sudden death the cause of which is unknown b. the greyhound died under suspicious or unusual circumstances. 	<p>Partial see 12*</p>
<p>*12 Response and Statement indicate a partial acceptance of this recommendation</p> <p>The Response states that the NSW Racing Minister is to amend GRNSW's Operating Licence to:</p> <ul style="list-style-type: none"> • <i>enhance reporting to GWIC on greyhound deaths from unknown causes in rehoming programs, particularly those under suspicious or unusual circumstances</i> <p>The response omits the word "require".</p>	

⁸ Both the Response and the Statement refer to these recommendations and expect GWIC to "develop minimum standards for greyhound rehoming facilities". The Statement also refers to GWIC being expected to "develop a plan for conducting annual inspections and audits of all GAP facilities". Further, GWIC should also "investigate the implications of potential legislative reforms to allow GWIC to conduct annual audits of other greyhound rehoming facilities run by third parties." However, neither the Response nor the Statement accept that the Act should be amended to require GWIC to perform these functions. Given this, Recommendations 9 and 10 are marked as Undetermined.

13	<p>GWIC should obtain autopsies for deaths of greyhounds under GAP’s care to identify the cause of death if:</p> <ul style="list-style-type: none"> a. the greyhound died a sudden death the cause of which is unknown b. the greyhound died under suspicious or unusual circumstances. 	Partial see 13*
<p>*13 There is no reference to this recommendation in the Response.</p> <p>The Statement indicates that GWIC will investigate how it could meet the requirements of the recommendation and that <i>“amendments to GRNSW’s Operating Licence will be considered to facilitate processes for GWIC to obtain autopsies in these circumstances, and to ensure any related recommendations from GWIC in response to autopsies obtained are actionable.”</i></p> <p><i>“GWIC is expected to report to the Minister with advice concerning this matter as part of the consideration of Operating Licence amendments, by 30 June 2026.”</i></p>		
14	GRNSW should immediately halt the USA Rehoming Program and not engage in any other overseas export of greyhounds.	Not accepted
15	The Act should be amended to require GRNSW to use domestic adoption pathways to rehome greyhounds.	Not accepted
16	Catastrophic injury reporting per track should be published by GWIC, in a manner that clearly conveys the number of lethal and non-lethal serious injuries per track over a given quarter, and annually. The publication should include historical and current quarterly reports, so the most recent snapshot and a trajectory over time for each track is publicly available.	Accepted⁹
17	GWIC should require its stewards to give more detailed reports on injuries for the consideration of the Race Injury Review Panel, including whether a greyhound seriously injured during racing died during its standdown period following the injury.	Accepted¹⁰

⁹ *“GWIC is expected to implement this measure by 30 June 2026.”*

¹⁰ While the Response does not directly address this recommendation, the Statement expects that GWIC will *“develop a plan to enhance reporting on serious injuries and outcomes”* to address the requirements of the recommendation. *“GWIC is expected to report to the Minister on its enhanced reporting plan by 30 June 2026.”*

18	The Zero Unnecessary Euthanasia policy should permit euthanasia of greyhounds only for medical reasons or when the greyhound had been declared a dangerous dog, has bitten a person or has failed a temperament assessment by a veterinary practitioner.	Undetermined¹¹
19	GWIC should conduct an annual review of the GCS 2.0 to assess its long-term effectiveness, analysing both on-track and off-track euthanasia for racing injuries, to identify euthanasia trends overall (as distinct from on-track euthanasia only).	Accepted¹²
20	The treatment pathways provided by GCS and HAS should continue so that greyhounds are properly cared for. However, greyhound owners should be required to bear a greater share of the cost of treating their injured greyhounds. The Minister should amend the Operating Licence to require GRNSW to obtain participant contributions to GCS and HAS treatment pathways, with a phase-in period.	Undetermined
21	GWIC should establish an electronic records system to enable OTVs to access greyhounds' racing records (including records of previous injuries) when conducting pre-race checks in the exam room.	Accepted¹³
22	The minimum standards for racecourse design and construction set under section 26(1)(a) of the Act, also known as the Minimum Track Standards, should include: a. strategic planning to transition greyhound racing away from curved tracks and towards straight track racing b. a requirement that all newly built tracks must be straight.	Undetermined¹⁴

¹¹ The Response states that GWIC is expected to "review identified matters relating to greyhound euthanasia to prevent potential misuse". While the Statement also references this recommendation, it does not specifically accept the suggested changes to the Zero Unnecessary Euthanasia policy. Given this, the recommendation is marked as Undetermined.

¹² According to the Statement, "GWIC is expected to report to the Minister on its progress in addressing the above matters by 30 June 2026, including its review plans."

¹³ According to the Statement, "GWIC is expected to report to the Minister on its progress in relation to implementing the above measures by 30 June 2026."

¹⁴ The NSW Government response states "Further analysis and consultation is required on other track safety recommendations, including those relating to straight track requirements." This response does not directly address Recommendation 22 so the recommendation is marked Undetermined.

23	<p>In upgrading tracks, GRNSW should require:</p> <ul style="list-style-type: none"> a. that for any track upgrades to curved tracks, an engineer be appointed to ensure clothoidal curves have longer entry and exit transitions to reduce greyhound collisions and injuries b. that for all track new builds or renovations, an engineer be appointed to determine the safest surface for greyhound racing (grass or sand). 	Undetermined
24	<p>GRNSW should cancel the 'travel subsidy' and any other participation fee within three months of the publication of this Report, and should not ever pay participants a fee (by any name) to participate in greyhound races.</p>	Undetermined
25	<p>GWIC should seek expert advice from appropriately qualified veterinarians on adequate recovery time for greyhounds between races and implement a rule that reflects that advice by 1 July 2026.</p>	Accepted
26	<p>GWIC should consider lowering the maximum racing temperature and amending its GWIC Hot Weather Policy within three months of the publication of this Report. While there is insufficient evidence for me to determine the matter, it is likely that a maximum racing temperature of 34 degrees would better protect greyhound welfare.</p>	Partial see 26*
<p>*26 Both the Response and the Statement refer to this recommendation</p> <p>Both documents omit the requirement that GWIC should consider taking action regarding the GWIC Hot Weather Policy "<i>within three months of the publication of this Report</i>" and the suggestion "<i>that a maximum racing temperature of 34 degrees would better protect greyhound welfare</i>".</p>		
27	<p>GWIC should monitor veterinary medical research findings and should consider at least annually whether its hot weather and recovery time policies should be updated to reflect those findings.</p>	Undetermined

28	The Minister should amend the Operating Licence to require GRNSW to have a full-time CVO position at a senior management level. The CVO should have veterinary qualifications and be responsible for prioritising greyhound health and welfare, guiding welfare policy, overseeing research, and ensuring GRNSW meets its objective under the Act to <i>“provide for the protection and promotion of the welfare of greyhounds”</i> and to <i>“exhibit a sense of social responsibility by having regard to the welfare of greyhounds”</i> . ¹⁵	Undetermined
29	GRNSW should continue to seek appropriate research partnerships to improve track safety and greyhound welfare.	Undetermined
30	<p>The Act should be amended to:</p> <ul style="list-style-type: none"> a. require GWIC to set minimum standards with respect to: <ul style="list-style-type: none"> i. racecourse design and construction ii. racecourse facilities and amenities that concern greyhound welfare iii. greyhound training facilities. b. require GRNSW to set minimum standards with respect to racecourse facilities and amenities that do not concern greyhound welfare c. require GWIC to consult with GRNSW and greyhound racing clubs in relation to setting any proposal to set the minimum standards (other than minimum standards with respect to racecourse facilities and amenities that do not concern greyhound welfare) but not so as to alter GWIC’s sole responsibility for determining and setting the minimum standards d. require GRNSW to consult with greyhound racing clubs in relation to setting minimum standards with respect to racecourse facilities and amenities that do not concern greyhound welfare (but not so as to alter GRNSW’s sole responsibility for determining and setting those minimum standards) 	Not accepted¹⁶

¹⁵ Greyhound Racing Act 2017, ss 3A(f), 23(b)

¹⁶ There is no direct reference to this recommendation in the Response. Given this and the statement by Steve Griffin, CEO GRNSW, that, *“We are also pleased that the Government has not accepted those recommendations”* including *“GWIC (the Greyhound Welfare & Integrity Commission) taking over the management of the Minimum Track Standards”*; this recommendation is marked as Not accepted.

- e. require GWIC to monitor and enforce compliance with the minimum standards (other than minimum standards with respect to racecourse facilities and amenities that do not concern greyhound welfare)
- f. require GRNSW to monitor and enforce compliance with the minimum standards with respect to racecourse facilities and amenities that do not concern greyhound welfare
- g. repeal section 26(3) and (4) and clarify that minimum standards have effect across all greyhound racing tracks, once set
- h. expressly provide for GWIC to have a power to exempt GRNSW or a greyhound racing club from a requirement to comply with minimum standards for a specified period, for the purpose of enabling potential improvements to standards to be trialled
- i. require GWIC to publish the minimum standards it sets
- j. require GWIC to set minimum standards of On Track Veterinarian rooms and the minimum amount of time each On Track Veterinarian should have available to examine each greyhound before racing
- k. require GWIC to annually audit the On Track Veterinarian rooms at each greyhound racing track for compliance with those minimum standards, including whether On Track Veterinarian rooms are adequately equipped and maintained to support the delivery of high-quality veterinary care at race meetings, and whether they meet the functional requirements of clinical practice.

31 Pending any legislative change:

- a. GRNSW and GWIC should publish the MTS on their websites
- b. GRNSW should revise and set the MTS by 31 December 2025, including giving effect to the MTS under section 26(3). Noting both that the MTS have no effect unless approved by GWIC, and my recommendation that the Act be amended to give GWIC the function to set the MTS in the future, as well as the importance of clarity, certainty, stability and predictability in standards for greyhound racing clubs, GRNSW should engage collaboratively with GWIC in setting the revised MTS.

Not accepted¹⁷

32	<p>The Minister should issue a Ministerial Statement of Expectation to GRNSW and a written direction to GWIC addressing the following matters:</p> <ul style="list-style-type: none"> a. the MTS are to be revised by 31 December 2025, and should include a timetable for implementation across all greyhound racing clubs that requires full compliance by no later than 31 December 2026, irrespective of whether this involves tracks closing, either permanently or temporarily b. GRNSW and GWIC are to engage in the process of revision in good faith c. revisions to the MTS are to be based on evidence and include a timeframe for compliance d. if the MTS are not revised by 31 December 2025, greyhound racing will be suspended until the MTS are revised e. if tracks are not brought into compliance with the MTS by 31 December 2026, greyhound racing will be suspended until tracks are brought into compliance. 	Not accepted¹⁷
33	The Operating Licence should be amended to remove clauses that are duplicative of provisions of the Act.	Undetermined
34	<p>GRNSW must determine a track rationalisation strategy and implement it by December 2026. While the tracks to remain open and those to be closed will be determined by GRNSW, the evidence before the Inquiry suggests that the number of tracks remaining open (of any category) should not exceed 14. GRNSW should set and implement its track rationalisation strategy with reference to three primary factors:</p> <ul style="list-style-type: none"> a. the serious injury rate at each track, with a view to closing tracks with higher injury rates b. the level of compliance with the minimum track standards, once re-set by the end of 2025, including the ability of the track to be brought into compliance with those minimum standards by the end of 2026, with a view to closing tracks with low levels of compliance or that are unable to be brought into compliance c. the regional spread of tracks, with a view to continued access to a track for the existing spread of greyhound racing participants. 	Partial see 34*

¹⁷ There are several reasons that Recommendations 31 and 32 are marked Not accepted. These include the delay in both the revision of the MTS and the timetable for implementation across racing clubs; the omission of any reference to the Act being amended to give GWIC ownership of the MTS function in the future (see Recommendation 30 and footnote above); and no reference to greyhound racing being suspended if the stated timeframes are not met.

<p>*34 The Response states that <i>“The NSW Government acknowledges GRNSW’s plans to consolidate the number of racetracks. Affected clubs and participants are being consulted on the ‘track optimisation strategy’. While consultation and the implementation of the strategy remains a matter for GRNSW, implementation will assist realising the recommended fewer and safer tracks in NSW.”</i></p>	
<p>35 If GRNSW fails to implement a track rationalisation strategy involving the implementation of minimum standards at those tracks by December 2026, greyhound racing should be suspended at all tracks.</p>	<p>Undetermined</p>
<p>36 To the extent the CGP remains operational in FY2026, the process should be changed to introduce a two-stage funding application process under which:</p> <p>a. GRNSW would first prepare a proposal to undertake certain preliminary investigations necessary to build a business case for full project funding. If GWIC supported the proposal, it would be put to the Office of Racing as an application for a modest and specified quantum of project feasibility funding, to enable GRNSW to scope out the project to the stage of developing a full business case on the template supplied by the Office of Racing. Those costs would be recoverable by GRNSW on presentation of a compliant business case.</p> <p>b. Then, GRNSW would present the full business case, on the template, for the project itself. Again, it would require GWIC’s endorsement. If the Minister approved the CGP application for the project, the project funding would be accessible by GRNSW as is currently the case. If the Minister did not approve the CGP application for the project, but the full business case was properly developed, GRNSW would be funded for the project feasibility funding, but not to undertake the project. If the business case presented was inadequate, GRNSW would not receive the project feasibility funding reimbursement.</p>	<p>Undetermined¹⁸</p>

¹⁸ The Response states *“the NSW Government will consider any CGP funding in line with the revised MTS”*. This response does not directly address Recommendation 36 so the recommendation is marked Undetermined.

37	Should the CGP, or other publicly funded monies, be made available to GRNSW beyond the end of FY2027, GRNSW's access to those funds should be contingent upon it fully implementing both minimum standards and track closures, consistent with my recommendations.	Undetermined¹⁹
49	The Act should be amended to prohibit members of the Board of GRNSW from wagering on greyhound racing	Undetermined
50	The Act should be amended to prohibit greyhound racing participants from being appointed to the Board of GRNSW.	Undetermined
56	<p>The Board should:</p> <p><i>[Sub-paragraphs omitted]</i></p> <p>o. urgently require management to settle (in active and collaborative consultation with GWIC), set and implement minimum track standards, with deadlines for implementation and regular standardised reporting against the strategy and deadlines, consistent with my recommendations</p> <p>p. urgently require management to develop a plan to rationalise the number of greyhound racetracks operating in NSW, consistent with my recommendations</p>	Not accepted²⁰
57	<p>The Act should be amended to change the constitution of the Board to require it to have at least four board members, who collectively have relevant qualifications and/or experience in:</p> <p>a. animal welfare or veterinary science</p> <p>b. business management</p> <p>c. government or public service management</p> <p>d. accounting or audit.</p>	Undetermined

¹⁹ The Response states “the NSW Government will consider any CGP funding in line with the revised MTS”. This response does not directly address Recommendation 37 so the recommendation is marked Undetermined.

²⁰ This recommendation is marked Not accepted given that: (sub-para o) - Recommendations 30, 31 and 32 were not accepted in the Response (see above), and sub-para p - the Response states that track consolidation remains a “matter for GRNSW”.

58	<p>The Government should take note of:</p> <ul style="list-style-type: none"> a. the ambiguous legal status of GRNSW as a body corporate established by statute but not owned by the State b. the consequent absence of corporate control and accountability ordinarily brought about by an ownership structure (whether public or private) c. the non-application to GRNSW of laws covering public sector entities (variously described), which are designed to support accountability, transparency, integrity and public trust, including: <ul style="list-style-type: none"> i. the Government Information (Public Access) Act 2009, ii. the Government Sector Employment Act 2013, iii. the Government Sector Finance Act 2018, iv. the Independent Commission Against Corruption Act 1988, v. the guidelines and protocols that exist as a result of the application of some of those laws. <p>The Government should actively consider the limitations and risks of GRNSW occupying a regulatory lacuna and the most appropriate alternative method to deliver accountability, transparency, integrity and public trust, particularly in the context of GRNSW's access to substantial wagering revenue.</p>	Not accepted²¹
59	<p>GRNSW's role as a regulator of GRNSW, as well as of participants, on matters of welfare and integrity should be clarified in the Act, especially given the enhanced functions I have recommended GWIC should assume.</p>	Not accepted²¹
60	<p>The Act should be amended to:</p> <ul style="list-style-type: none"> a. clarify the intended scope of section 24(1)(h) b. incorporate relevant functions from the operating licence into GRNSW's statutory functions 	Not accepted²¹
61	<p>The Operating Licence should be made a part of the regulations under the Act so that it is a disallowable instrument and within the scope of Parliamentary review.</p>	Not accepted²¹
62	<p>The Government should implement appropriate funding arrangements for the Inspector of Greyhound Racing and the enhanced functions of GWIC at an appropriate level for each of them to carry out their functions. The</p>	Not accepted²¹

	funding of neither body should be tied to revenue streams from wagering or taxes on wagering. Section 24(1)(f) of the Act should be reconsidered in that light.	
63	A new office of Greyhound Racing Industry Inspector should be established under the Act with functions similar to those of the Inspectors of the Independent Commission Against Corruption and the Law Enforcement Conduct Commission, supplemented by certain powers of visitation and access of the Inspector of Custodial Services. The Inspector should be required to report to Parliament annually, empowered to report to Parliament at other times, and be subject to oversight by a Parliamentary Joint Committee.	Not accepted²¹
64	<p>A Committee of both houses of Parliament should be established under the Act, with powers regarding the calling of evidence, conduct of proceedings and confidentiality that are consistent with existing joint statutory committees of Parliament, and with functions to:</p> <ol style="list-style-type: none"> a. monitor and review the exercise of functions by GRNSW, GWIC and the Inspector b. examine the funding arrangements in respect of GRNSW, GWIC and the Inspector c. report to both houses of Parliament on any other matter pertaining to GRNSW, GWIC and the Inspector if it considers Parliament’s attention should be directed to that matter d. examine annual and other reports produced by GRNSW, GWIC and the Inspector e. examine trends and changes in the greyhound industry at large and to report to Parliament any changes the Committee considers desirable to the functions, structures and procedures of GRNSW, GWIC and the Inspector f. inquire into any question referred to it by Parliament in connection with its functions and to report to Parliament on the question. 	Not accepted²¹

65 The Act should be amended so that the objectives of the Act, of GWIC and of GRNSW (and any objectives introduced for the role of Inspector) give primacy to greyhound welfare ahead of all other objectives, consistent with the Terms of Reference in this Inquiry to ensure the greyhound racing industry operates with the highest standards of integrity and animal welfare.

Not accepted²¹

²¹ The Response states, *"While the NSW Government notes the Report's recommendations related to industry oversight, it considers that the current legislative and regulatory framework for greyhound racing in NSW is fit for purpose and in line with regulatory best practice."* It also states, *"The Minister will issue an amended Operating Licence in early 2026 to address recommendations related to GRNSW's governance framework, procurement process, conflicts of interest, financial delegations of authority, and the Board Charter. These Operating Licence changes will require GRNSW to meet community expectations with respect to corporate governance, improve organisational management and generate better outcomes for industry."*

Suggested amendments to the Operating Licence do not meet the requirement for *"structural and systemic reforms arising from the issues identified by the Inquiry as a whole"* as expressed in the Report.

The Report expands on this in Section E: Structural and Systemic Issues, Chapter 17: Structural and oversight reforms stating, *"These reforms are designed to address underlying structural problems that are built into the establishment of GRNSW as a body corporate under the Act. This Report has documented many instances of poor decision-making enabled by a deficient oversight framework."*

There is no direct response to Recommendation 58 which specifies the Government should actively consider, *"the most appropriate alternative method to deliver accountability, transparency, integrity and public trust particularly in the context of GRNSW's access to substantial wagering revenue."*

With reference to Recommendation 64, Steve Griffin, CEO GRNSW, stated that, *"We are also pleased that the Government has not accepted those recommendations"* including *"oversight by an ongoing committee of Parliament"*.

Given this, Recommendations 58-65 are marked Not accepted.

Appendix 1

Current Operating Licence conditions not met by GRNSW – Minimum Track Standards (MTS) and Rehoming

In this Appendix, as in the rest of this document, CPG focusses on the critical welfare areas of breeding, rehoming and track safety.

Below are excerpts from the [GRNSW Operating Licence](#) relating to these areas. The [Drake Inquiry Report](#) identified numerous instances where GRNSW is failing to meet the conditions of its Licence and a selection of these findings is also included below.

GRNSW Operating Licence, Function 10. Minimum Standards

“10.2 Minimum Standards for Racecourse and Training Facilities

(a) The Licensee must set and maintain minimum standards with respect to:

- (i) racecourse design, construction, maintenance and preparation;*
- (ii) racecourse facilities and amenities (including facilities and amenities to be provided for patrons, such as grandstands and other patron amenities); and*
- (iii) greyhound training facilities.*

(b) The component of the minimum standards dealing with racecourse design is to be informed by the University of Technology Sydney research Identifying optimal greyhound race track design for canine safety and welfare.

(c) The Licensee must revise and update the minimum standards for racecourse and training facilities every five years, and at least by 1 January 2025, based on latest research in track design, to ensure that the standards remain contemporary and meet best practice”.

“10.5 Compliance with Minimum Standards by the Licensee and Greyhound Racing Clubs

(a) Where a Greyhound Racing Club is subject to the requirement/s imposed under 10.5(c)(i)-(iii), the Licensee must ensure that any greyhound race meetings that it conducts only take place where the racecourse facilities and amenities of that Greyhound Racing Club meet the minimum standards.

(b) Where a Greyhound Racing Club is subject to the requirement/s imposed under 10.5(c)(i)-(iii), the Licensee must ensure that greyhound race meetings conducted by that Greyhound Racing Club only takes place where its racecourse facilities and amenities meet the minimum standards.

(c) The requirement/s for 10.5(a) and 10.5(b) may be imposed by the Licensee on Greyhound Racing Clubs by one or more (or any combination) of:

(i) a direction in writing to Greyhound Racing Clubs;
(ii) as a condition of the registration of Greyhound Racing Clubs; or
(iii) as a condition of the allocation of the dates on which Greyhound Racing Clubs may conduct greyhound race meetings.

(d) The Licensee must monitor the compliance of Greyhound Racing Clubs with the minimum standards set by the Licensee.

(e) Where it appears to the Licensee that a Greyhound Racing Club has failed to comply with the minimum standards, the Licensee must determine whether it should institute disciplinary action against the club in accordance with the Act.

(f) The Licensee must report within 28 days the failure of a Greyhound Racing Club to comply with the minimum standards to the Commission.

Report Findings, Chapter 7: Minimum Track Standards

The MTS have never been implemented. Not a single track in NSW, including ones involving a complete rebuild, has ever met all of the MTS. The deficiencies are not confined to 'non-animal welfare' standards. This situation would persist, albeit to a lesser degree, even if GRNSW's 2024 Track and Welfare Strategy were implemented in full.

Although tracks have been suspended (or meetings ended) when major issues resulted in animal injury or death, GRNSW has not given effect to the MTS as required under the Act. It has never directed clubs to comply, or made compliance a condition of registration or race date allocation. Furthermore, GRNSW has not ensured that greyhound racing only occurs on tracks that meet the MTS. It has put forward a number of justifications and explanations for this which are discussed below. To the extent that they can be accepted, it demonstrates that there was no realistic prospect of full compliance with the MTS ever being achieved across all tracks.

GRNSW was also required to revise and update the MTS by 1 January 2025, to ensure the MTS remained contemporary and met best practice. The review GRNSW undertook instead had the effect of reducing the requirements imposed by the MTS in a manner which accommodated existing areas of non-compliance.

In any event, the MTS were not updated as GWIC did not approve the revised MTS proposed by GRNSW as a result of that review. GRNSW has sought and obtained approval from the Minister for additional time to comply with its obligation to update the MTS.

GRNSW Operating Licence, Function 11. Rehoming

(a) All rehoming programs administered or funded by the Licensee must use best practice, as recognised by the Commission's Greyhound Industry Animal Welfare Committee, to assess the compatibility of a greyhound with prospective owners before permanently rehoming them.

(b) All rehoming programs administered or funded by the Licensee must verify the outcomes of a reasonable representative sample of rehomed greyhounds as part of auditing requirements and make this information available to the Commission when requested.

(c) The Licensee must develop and implement policies that aim to progressively improve the total number of greyhounds rehomed each year.

(d) The Licensee must, in consultation with the Commission, propose an annual greyhound rehoming target by 1 July each year and report on its performance against this target each year as part of its annual report.

(e) The Licensee must report rehoming data from Greyhounds as Pets, as well as other programs supported by the Licensee, to the Commission on a quarterly basis, from the commencement of this Operating Licence.

Report Findings, Chapter 3: Breeding and rehoming of greyhounds

"It is unsatisfactory that, despite the issue of rehoming remaining squarely within the remit of GRNSW at all times since it was granted an Operating Licence in 2017, eight years on, on its own submission, findings cannot be made as to how many dogs have been "successfully rehomed", and GRNSW finds itself in a position of uncertainty as to the meaning of the word."

If, as GRNSW submits, there is such uncertainty as to how 'rehoming' is defined, such that conclusions cannot be drawn about how many dogs have in fact been 'rehomed', this issue ought to have been raised by GRNSW with the Minister well before the commencement of this Inquiry. In circumstances where GRNSW has clear responsibility under its Operating Licence for both setting and reporting annual 'rehoming targets', it begs the question, how GRNSW could have been discharging its obligations to date."

GRNSW Operating Licence, Function 12. Breeding

(a) The Licensee must continue to advocate for a national industry approach to breeding controls for greyhounds.

Report Findings, Chapter 3: Breeding and rehoming of greyhounds

Based on the evidence before this Inquiry, including GRNSW's submission, I conclude that GRNSW has not discharged its function under the Operating Licence to advocate for a national industry approach to breeding controls.