



Coalition for the Protection of Greyhounds

Submission to Tasracing Industry Consultation Paper

Introduction

Tasracing has called for feedback on their Five Year Strategic Plan from greyhound racing industry participants and stakeholders. The Acting Director of Racing and GM of the Office of Racing Integrity (ORI), Antony Latham has confirmed that the Coalition for the Protection of Greyhounds (CPG) can be included in this process.

Unlike other jurisdictions, Tasracing is a state-owned company, established in 2009 under the Racing (Tasracing Pty Ltd) Act 2009 and the Corporations Act 2001 (Cth). Tasracing has two members, the Treasurer and the Minister for Racing, who hold shares in the company in trust for the Crown.

Our involvement with racing

CPG is an Australia-wide organisation working to improve greyhound welfare. Our aim is to reduce deaths and injuries on the track and ensure that every healthy greyhound lives out the full term of its natural life in conditions that meet the five domains of animal welfare¹.

Our submission

This submission by CPG will address the specific areas requested in the feedback document. This feedback will be limited to greyhounds. The key areas on which Tasracing is requesting comment appear as boxed text followed by the CPG response in italics.

¹ <https://kb.rspca.org.au/knowledge-base/what-are-the-five-freedoms-of-animal-welfare/>



Strategic Objectives and Vision

Vision - The direction we take in order to achieve our long term goals for the Industry.

Issues:

What do you see as the top 4 key strategic issues that need to be addressed?

1. *Overbreeding.*
2. *Making tracks safer to reduce deaths and injuries as a result of racing.*
3. *Ensuring that every greyhound bred in Tasmania or imported into Tasmania lives out the full term of its natural life in conditions that meet the five domains of animal welfare.*
4. *Eliminating unethical behaviour such as doping, over-racing and failure to give appropriate vet treatment.*

Why do you see these as the top 4 strategic issues?

The importance of meeting society's expectations regarding the use of animals in racing is recognised by all Australian racing bodies and state governments. Without this approval, it is unlikely the racing industry will achieve strength and sustainability. Tasracing recognises this as a critical part of their corporate responsibility, stating "The welfare of all racing animals in Tasmania is a core priority for Tasracing" and "Tasracing strives to meet or exceed community expectations relating to animal welfare."²

The primary issue for many in the Australian community is the unnecessary deaths of greyhounds no longer required by the racing industry and the number of track-related deaths and injuries. Another key concern is the physical and psychological damage to greyhounds caused by the administration of banned substances, over-racing and failure to give appropriate vet treatment.

How should we define success for the Industry?

- *Zero track-related greyhound deaths and injuries.*
- *Every greyhound born in or imported into Tasmania living to the full term of its natural life.*
- *Every greyhound protected from the effects of doping, over-racing and failure to give appropriate vet treatment.*

How do we measure success for the industry?

- *Zero track-related greyhound deaths and injuries.*
- *Every greyhound born in or imported into Tasmania living to the full term of its natural life.*
- *Every greyhound protected from the effects of doping, over-racing and failure to give appropriate vet treatment.*

² <https://tasracingcorporate.com.au/corporate-responsibility/welfare/>

What do you see as Tasracing and the Industry's top three long term goals?

- *Zero track-related greyhound deaths and injuries.*
- *Every greyhound born in or imported into Tasmania living to the full term of its natural life.*
- *Every greyhound protected from the effects of doping, over-racing and failure to give appropriate vet treatment.*

Animal Welfare

Racing only exists with the support of the general public. Without this “social license” racing could be banned or lose all government support. Animal welfare issues are critical to this social license.

Issues:

What responsibility should be held by GAP?

GAP must be capable of rehoming all greyhounds bred in Tasmania and all greyhounds imported into Tasmania.

Should it be the primary rehoming resource?

Yes. Private rehoming organisations depend upon public donation for funding. It is not equitable that private donors should be paying to rehome greyhounds that are bred and imported for commercial reasons. The industry must pay for this rehoming through GAP. Brightside Farm Sanctuary is a major player re increasing public awareness and the plight of greyhounds. They rehome at least as many hounds as GAP and must be adequately funded.

Should there be many organisations doing rehoming but GAP sets the rehoming standard?

Private rehomers should only be used where GAP is not capable of rehoming the number of greyhounds discarded by the industry.

GAP should not set the rehoming standard. This standard must be set by the Office of Racing Integrity. There are examples from other states where GAP has rejected a greyhound for rehoming, the greyhound has been transferred to a private rehomer and the private rehomer has been able to retrain the greyhound to a standard where it can be rehomed. It is too easy for GAP to set the standard too high thereby maximising the number of greyhounds euthanased.

What responsibility should be held by the Off The Track program? Should it set the equine welfare standard?

Not applicable.

Should Tasracing financially support other rehoming operations (non GAP or OTT entities)?

Yes. The principle of Extended Producer Responsibility applies. CPG has produced a paper recommending that private rehoming and foster carers must be funded by the industry or the government. Click [here](#) for the CPG white paper "Funding for NSW Greyhound Rehoming Providers".

What level of responsibility should Tasracing take on for equine rehoming?

Not Applicable.

Should it take ownership of animals, retrain and rehome or fund and support these operations?

Greyhounds that cannot find a home for any reason must be provided with a whole of life sanctuary in which to live for the term of their natural life. The sanctuaries could either be privately operated, operated by Tasracing or through a combination of the two. The sanctuaries must be funded by Tasracing. Click [here](#) for the CPG white paper "Greyhound Sanctuaries".

Should rehoming responsibility continue after adoption?

Yes. Adopting a greyhound is an expensive undertaking. Under the principle of Extended Producer Responsibility, Tasracing should be responsible for all vet expenses following adoption.

Should there be a follow up for greyhound and equine to keep track of animals 6 to 12 months after rehoming?

Yes. This follow up ensures that healthy greyhounds have not been euthanased and that they are living in conditions which meet the five domains of animal welfare.

Should it continue for the life of the animal?

Yes. There must be whole of natural life Cradle-to-Grave tracking. Recommendation 7 of the Joint Select Committee Report into Greyhound Racing in Tasmania 2016 stated "That the Office of Racing Integrity develop and maintain a comprehensive database to enable all greyhounds whelped in Tasmania, or imported, for the racing industry to be tracked at all stages of life."

This measure ensures that healthy greyhounds have not been euthanased and that they are living in conditions which meet the five domains of animal welfare.

A study conducted by CPG shows that more greyhounds died or were retired/adopted in 2020 than were whelped in the preceding two- and four-year period. The study shows that Tasracing must record all greyhounds whelped or imported into Tasmania on a greyhound register and that this register must be publicly available. The study is included as Attachment 1.



Should Tasracing allocate funding to develop a retraining program?

Yes. Many greyhounds are assessed as unsuitable for rehoming because they have not been given sufficient time and training to transition from a racing environment to a home environment. This retraining must be paid for by the industry that failed to train them for life after racing.

Should Tasracing allocate funding to develop retirement facilities for equines?

Not applicable.

What level of responsibility, if any, rests with breeders for equine and greyhound welfare?

Overbreeding is one of the most critical issues for the greyhound racing industry. Regulations should be put in place to control the number of greyhounds whelped by individual breeders and the industry as a whole. The permitted number of greyhounds allowed to be bred should never exceed the number of homes available to adopt them. Tasracing should also assess those factors that contribute to over-breeding such as financial incentives for breeding, appearance fees and the lure of prize money.

Breeding

The Tasmanian breeding industry provides an important source of racing animals to support the local industry as well as generating economic contributions to the state.

Issues:

What do you think is meant by “responsible breeding”?

Responsible breeding means only breeding the number of greyhounds that can be rehomed once they are no longer required by the racing industry.

Recognising that locally bred animals are an important source of stock for local racing while at the same time oversupply creates significant welfare issues, do you have a view on how many animals should be bred locally for each code?

The number of greyhounds bred (and imported) must not exceed the number of places available for these greyhounds to be rehomed.

Are current levels acceptable? Would more or less be preferred?

In response to a Right to Information (FOI) request form from Let the Hounds Run Free Inc., the Tasmanian government Office of Racing Integrity provided the following figures in April 2020.

Whelpings and litter numbers

		2016	2017	2018	2019
1	Number of litters	43	38	44	41
2	Number of pups born	273	266	298	249
3	Number of pups deceased at birth	19	13	10	42
4	Number of dogs from litters in these years subsequently registered to race	201	186	188	0 to date

These figures show that of greyhounds which did not die at birth a significant number did not go on to race as follows:

2016 53 21% of live births.

2017 67 26% of live births.

2018 100 25% of live births.

These figures show that over the 2016-2018 period an average of 24% of greyhounds which survived whelping did not go on to race. By any measure this shows a consistent overbreeding problem.

Do you have any views on the appropriateness or not of the current breeding incentives?

Given that 24% of greyhounds who survive whelping but do not go on to race there should be no breeding incentives.

What changes, if any, would you recommend and why?

If these 24% of greyhounds were disposed of by the industry because they were not required to race, then breeding should be reduced by 24%.

Should more or less stakes money be allocated to Breeding incentives?

There should be no breeding incentives.



Other Issues

Are there any other issues relevant to strategic direction and vision that should be addressed.

Issues:

Social Licence

Surveys have shown that greyhound racing in Australia has lost its social licence.

- A [Channel 7 News poll](#) in 2018 showed 95 per cent of its 39.8K respondents said 'no' to the question - 'The NSW government today donated \$500,000 to the richest dog race in the world. Is this a good use of taxpayer's money?'
- 82 per cent of people responding to an [ABC greyhound racing poll](#) were in favour of completely shutting down the industry.
- [Independent research by the RSPCA](#) found that two out of three people in NSW and the ACT support the ban on greyhound racing.

The greyhound racing industry only continues because of state government financial support. Governments do this because the money they collect from gambling exceeds the amount they contribute to the racing industry.

Tasmanian Department of Treasury and Finance Review

The Tasmanian Department of Treasury and Finance conducted a review in 2020 of the costs and structure of Tasracing Pty Ltd (Tasracing), with a particular focus on its funding and expenditure. Selected excerpts from this review are reproduced below.

The review highlighted that the Tasmanian Government is the only state government which guarantees annual industry funding by way of a twenty-year funding deed signed in 2009.

"In 2018-19, Tasracing received \$31.37 million in government grants, which equated to \$58.72 per capita (based on the Tasmanian population as at June 2019). This is substantially higher than most other jurisdictions on a per capital basis, with the exception of the NT."

"REVENUE SOURCES

"When comparing state government funding as a percentage of total revenue, at 64 per cent Tasracing has by far the highest percentage when compared to its interstate counterparts. The next highest is Queensland at 23 per cent, and the lowest being Victoria at six per cent.

"While it is acknowledged that Tasmania has a very different racing industry to Victoria, largely due to the difference in population and size of racing events in the two states, this is a significant difference in government funding.

"Similarly, when comparing race field fees and wagering revenue as a percentage of total revenue, Tasmania's 31 per cent is significantly less than Victoria at 79 per cent, SA at 81 per cent and Queensland at 59 per cent.

"These statistics show how reliant Tasracing is on government funding compared to its interstate counterparts."

"INDUSTRY PARTICIPATION

The thoroughbred and harness codes of racing publish annual data on participation within their industry. The national greyhound industry body does not disclose participation data for the code, however breeding statistics are available which provide some indication of trends within the code, in addition to racing data published by each jurisdiction annually."

"Greyhound racing

*Participation in the greyhound racing code across jurisdictions in recent years has been mixed. In Tasmania, it has been subdued with zero growth in the number of races and meets **between** 2015-16 and 2018-19, and a one per cent decline in the number of starters."*

"On a national scale, indicators point to a general decline in the greyhound industry. This is shown by the fact that in 2008 there were 76 greyhound racing clubs across Australia, whereas in 2020 there are now 65.

Furthermore, breeding of greyhounds has significantly declined in recent times. Greyhounds Australasia recorded a 39 per cent reduction in the number of greyhounds bred in Australia between 2014 and 2018; with a decline of 70 per cent in Tasmania over this same period."

CPG comment on Treasury and Finance Review

Greyhound racing in Tasmania is only viable with substantial financial support from Tasmanian taxpayers. Given that surveys show the majority of respondents do not support greyhound racing and the fact that the industry is in decline, the Tasmanian government must stop this support.

Making tracks safer

The [CPG Lethal Tracks 2020 Report](#) shows that 12 greyhounds were killed on Tasmanian tracks and a further 230 were injured in 2020. This figure does not include the number euthanised away from track following injury as this information is not publicly available.

An ORI response to a Request for Information by Let the Hounds Run Free Inc. is reproduced below. It shows a level of deaths and injuries that are totally unacceptable.

Deaths and injuries

Number of deaths and injuries and subsequent status of those greyhounds.

		2016	2017	2018	2019
1	Number of injuries at the track	35	331	363	309
2	Number euthanised at the track	25	13	25	7
3	Number euthanised away from track following injury	104	66	48	32
4	Number retired following injury				
5	Number of long-term injury/recovery	0	18	19	13
6	Number scratched due to injury or illness	1006 572	1172 407	1130 336	1009 283

Notes:

Serial 1 12016 - access to this reporting structure in database was not available for the full year.

Serial 4. We do not collect information on "retired due to injury" in our retired data. Difficult to identify greyhound that had injuries and then ended up retiring as we cannot say that the injury caused the retirement from any data we collect.

Serial 5. Numbers relate to those who were given 29+ days stand-down following an injury. What do they consider to be recovered? EG: Raced again? Difficult to ascertain this information.

Serial 6. Top line = no of scratchings; Bottom line = no of individual greyhounds scratched due to injury or illness rule

In 2015/16 Greyhound Racing NSW (GRNSW) commissioned the University of Technology Sydney (UTS) to examine how to make greyhound tracks safer. The report was given to GRNSW in 2016. The primary recommendations were to use straight tracks only, reduce the race field from eight to six and position the lure in the centre of the track.

CPG has conducted our own independent studies on the impact of straight track racing and six dog fields. Our findings agree with those of UTS. Click [here](#) for the CPG white papers "The Case for Straight Tracks" and "The Case for Six Dog Races".

We call upon Tasracing to immediately reduce the race field to six dogs, to reposition the lures to the centre of the track and to commence construction of straight tracks. Once the straight tracks are constructed racing on oval tracks is to be banned.