



Submission to the Rural and Regional Affairs and Transport Legislation Committee



Customs Legislation Amendment (Commercial Greyhound Export and Import Prohibition) Bill 2021

**Prepared by the Coalition for the Protection of Greyhounds
August 2023**

End greyhound suffering

About the Coalition for the Protection of Greyhounds

The Coalition for the Protection of Greyhounds (CPG) is a not-for-profit organisation committed to ending greyhound suffering by exposing the cruelty and corruption of the greyhound racing industry and lobbying for law reform. We have members across Australia.

We advocate for law reform that:

Ends taxpayer funding. A national survey on attitudes towards dog racing revealed that 69% of Australians oppose the use of taxpayer funds to prop up the greyhound racing industry. State and territory governments must listen to their constituents and stop diverting funds from education, healthcare and employment programs to support this archaic and callous industry.

Stops unsustainable breeding. The greyhound racing industry breeds many more dogs than can be rehomed. Caps on breeding must be introduced to ensure that all dogs bred by the industry are able to live out their lives as pets at the end of their racing career.

Implements whole-of-life tracking. Greyhounds in the racing industry are vulnerable to unnecessary euthanasia, particularly those puppies who do not race and dogs who are rehomed by industry participants. A system must be implemented to monitor the welfare of each greyhound for their entire life.

Establishes independent regulators in all jurisdictions. Most jurisdictions rely on self-regulation by the industry, which has been shown again and again to be corrupted by conflicts of interest. Governments benefiting from betting tax revenue must establish independent regulators that prioritise the welfare of greyhounds.

Stop building new tracks. Attempts by the industry to build 'safe' tracks have failed. The evidence shows that greyhounds continue to be injured and killed on all track designs currently in operation, including straight tracks. There is no such thing as a safe dog racing track.

Executive summary

The Coalition for the Protection of Greyhounds (CPG) supports the amendments proposed in the Customs Legislation Amendment (Commercial Greyhound Export and Import Prohibition) Bill 2021 (the Bill).

Recent history shows that Australian greyhound owners have routinely circumvented current greyhound export restrictions imposed by the peak industry body, Greyhounds Australasia, to maximise profits from supplying greyhounds to overseas facilities notorious for their horrendous treatment of greyhounds. There is no doubt that some greyhound owners will continue to pursue these revenue streams.

The Bill does not adequately close loopholes that are currently being exploited, chief of these being the absence of a ban on exporting entire greyhounds. This is a major loophole that has been exploited by Australian greyhound owners as recently as 2022, but there are others.

The main reason that greyhound owners are seeking to export greyhounds is to supply demand from overseas breeders. A simple preventive measure would be to add a further amendment to the Bill, specifying that only neutered pet greyhounds can be exported. This would be the most effective deterrent as it would remove the financial incentive to cheat the system. Further, CPG does not see any reason why an owner of a pet greyhound would need to export an entire greyhound.

CPG has identified a number of veterinary studies published in peer-reviewed scientific journals that show air transport causes significant behavioural and physiological stresses in dogs. These studies largely involved short travel (mainly in Europe) so it is almost certain that any observed adverse effects would be exacerbated by the much longer flights from Australia, especially flights involving multiple stopovers. This is especially relevant to recent programs involving the large-scale export of greyhounds to the USA, which have not provided any information about how they assess and mitigate greyhound welfare risks associated with the travel.

The Federal Government, in adopting amendments to the Customs Legislation, faces reputational risks from animal welfare issues arising from non-compliance. This report provides examples where this has already happened. CPG therefore urges the Federal Government to take a precautionary approach to the number of greyhounds that can be included in any one export or import permit application, and to ensure that the greyhound export/import function has the resources to ensure effective regulation.

Finally, CPG believes there are no trade implications from the proposed amendments.

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CPG makes the following six recommendations:

Recommendation 1

CPG supports amending legislation to prohibit the export/import of greyhounds and their genetic material from/into Australia.

Recommendation 2

That 9ABA(3)(a) of the Bill be amended to allow permission for export of a pet greyhound only where the greyhound has been neutered.

Recommendation 3

That section 9ABA of the Bill be amended to specify that an application seeking permission to export a greyhound, which does not include a veterinary certificate certifying the greyhound has been neutered, is not an application for the purpose of 9ABA(2).

Recommendation 4

That Part 2 of the Bill be amended to:

- allow permission for import of a pet greyhound only where the greyhound has been neutered, and
- specify that an application seeking permission to import a greyhound, which does not include a veterinary certificate certifying the greyhound has been neutered, is not an application for the purpose of paragraph 4WA(2).

Recommendation 5

In implementing the proposed amendments to the Customs Regulations, mechanisms are specified in legislative instruments or regulatory policies that:

- limit the number of greyhounds that can be included in an export or import application, which provides no evidence about greyhound welfare outcomes
- require the applicant to report on the effectiveness of welfare risk management strategies and welfare outcomes before being able to apply for an export or import permit involving a larger number of dogs.

Recommendation 6

In implementing the Customs Legislation Amendments, best practice regulatory principles are applied and sufficient resources are available to ensure effective risk assessment and regulation of greyhound exports and imports.

Introduction

Greyhound racing in Australia has resulted in a staggering number of greyhounds being killed each year, estimated to be around 17,000. Many are euthanized as pups or at the end of their racing careers due to injuries sustained during racing or simply as surplus dogs. The over-breeding of greyhounds has created a market for using them in research, veterinary school teaching, and live exports, as a response to this ongoing issue.¹ While Greyhound Adoption Programs have been established and welcomed, they only manage to save a small percentage of the total number of greyhounds in need of rehoming.

Lack of Legal Protections

Since animals are considered property under the law,² they do not have an inalienable right to life. Killing a dog is not considered an offence under current Australian anti-cruelty statutes unless it causes unnecessary suffering and pain. This has raised debates about the threshold test of 'necessity' as a qualification for the offence of animal cruelty. The treatment of greyhounds in the racing industry raises concerns as it seems to cross moral boundaries that are usually protected for other breeds.³ The large number of greyhounds killed each year, even by conservative standards, is deemed gratuitous and conflicts with Australia's claim of having an animal welfare leadership role in the region.

The racing industry's self-regulation has proven inadequate in preventing illegal exports. Export activity revolves around greyhounds being flown into the UK before being rerouted to China. The United Kingdom is a legal destination providing a passport has been granted by Greyhounds Australasia while China has been banned from receiving any Australian exports since 2016.⁴

Oversupply and Export

The national rate of greyhound breeding far exceeds the racing industry's capacity to rehome them through official adoption programs.⁵ Community greyhound rescues are struggling to cope with the influx of dogs from the racing industry. The sport's revival, driven by record online gambling income, has led to unsustainable breeding practices.⁶ Racing bodies in New South Wales, Victoria, and South Australia have started partnership programs with emergency services to deal with the surplus dogs under the guise of

¹ https://www.animallaw.info/sites/default/files/McEwan_Skandakumar_AAPLJ_Greyhound_2013.pdf

² <https://www.unswlawjournal.unsw.edu.au/wp-content/uploads/2018/12/Shyam.pdf>

³ https://www.animallaw.info/sites/default/files/McEwan_Skandakumar_AAPLJ_Greyhound_2013.pdf

⁴ <https://www.racenet.com.au/news/concerns-greyhounds-had-been-exported-overseas-without-greyhounds-australasia-approval-20210817>

⁵ <https://www.theguardian.com/world/2022/aug/27/australian-racing-industry-failing-miserably-to-rehome-greyhounds-as-adoption-flatlines>

⁶ <https://www.smh.com.au/national/nsw/online-gambling-driving-surge-in-greyhound-breeding-rescues-inundated-20230114-p5ccib.html>

providing PTSD support.⁷ This has resulted in Australian greyhounds being exported to the United States as PTSD pets.⁸

The ongoing lack of federal law to prohibit the export of greyhounds to countries with poor animal welfare records is a long-standing issue. It has allowed for illegal exports to countries like China, where greyhounds face cruel conditions and abuse. The excessive breeding and killing of greyhounds in the racing industry and the subsequent export of dogs demonstrate a disregard for animal welfare and contradict Australia's claimed leadership role in promoting animal welfare in the region. Stronger measures and oversight are needed to address these challenges and protect the well-being of greyhounds in Australia.

⁷<https://galtd.org.au/2022/12/05/police-association-and-the-greyhound-industry-join-forces-on-welfare/>

⁸<https://www.thedogs.com.au/news/2023-05-16/us-police-australian-greyhound-industry-form-historic-allied-partnership>

The amendments are necessary to prevent cruelty against and exploitation of Australian greyhounds in other countries

Australian greyhound industry has a track record of exporting greyhounds to abusive environments

Two egregious examples of this are the Macau Canidrome and the Shanghai Wild Animal Park. It is estimated that more than 20,000 greyhounds, mostly from Australia, were exported to the Macau Canidrome.⁹ This dog racetrack is infamous for its horrendous abuse of greyhounds. For example, one investigation revealed that 383 underperforming greyhounds were killed by Macau Canidrome staff in 2011.¹⁰ In response to the animal cruelty practised at this facility, Greyhounds Australasia banned the export of Australian greyhound to Macau in 2014.

The extent to which Australian greyhound racing industry participants profited from the export of greyhounds to the Macau Canidrome is highlighted by the fact that Greyhound Racing NSW charged 179 trainers and owners with exporting greyhounds to Macau three years after the industry ban.¹¹ At the Shanghai Wild Animal Park, greyhounds are kept and raced under appalling conditions, and are fed to the park's predators when they are injured.¹²

Both these facilities are internationally infamous for the cruel conditions in which the dogs are kept and the horrendous fate that awaits 'uncompetitive dogs'. It is highly unlikely that the Australians who exported their dogs to these facilities were unaware of the fate that awaited their dogs.

In 2017, three Australian greyhound owners were fined for illegally exporting 166 dogs to China, where the animals were subjected to cruel conditions, at Shanghai Wild Animal Park. The scheme involved purchasing unwanted dogs from New South Wales race tracks at low prices and selling them for profit in China. Despite a ban on exports to Macau, introduced by Greyhounds Australasia in 2014, 96 greyhounds were exported to the Macau Canidrome racetrack. Another 70 dogs were exported to the Shanghai Wild Animal Park, known for its inhumane animal shows.

⁹<https://au.news.yahoo.com/five-australian-greyhounds-return-home-cruel-conditions-macau-080031513.html>

¹⁰ <https://time.com/5350843/macau-greyhound-adoption-animal-welfare/>

¹¹ <https://www.abc.net.au/news/2016-06-09/greyhound-racing-nsw-charges-179-trainers-owners/7497738>

¹² <https://www.smh.com.au/national/australian-greyhounds-forced-to-race-cheetahs-at-shanghai-wild-animal-park-20170526-gwe27l.html>

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Two of the owners were disqualified for two-and-a-half years and fined \$22,000, while the third was suspended for aiding and abetting the exports. It was estimated that the trio made a profit of \$300 per dog, resulting in a total of \$50,000 from the exports.

The greyhound owners had obtained permits through the Federal Department of Agriculture and complied with its requirements. This is despite the Greyhound Racing NSW requirement that animal passports be obtained before export. These passports are obtained through Greyhounds Australasia, which is supposed to prevent dogs from being sent to places like Macau. However, the Federal Department of Agriculture did not advise the greyhound owners of the passport requirement, nor did the absence of a passport prevent the issue of a Federal export permit.¹³

In 2018, two Australian greyhound owners were found to have exported 212 greyhounds to Macau.¹⁴

In 2021, two Australian racing greyhounds, Canya Cruise and Turbo Thomas, were illegally exported to China. Their owners circumvented the required procedures for exporting greyhounds by falsely claiming that the dogs were intended to be "pets" or "companion animals" rather than competitors or breeding animals.¹⁵ This deception allowed them to avoid obtaining a passport from Greyhounds Australasia or routing the dogs through countries considered "safe" by the industry.

It is alarming that despite the industry also banning exports to China in 2016 due to concerns about cruelty, the Australian government has not taken legislative action to ban greyhound exports. This lack of regulation has enabled the exportation of these dogs, putting them at risk of mistreatment and abuse.

The export forms obtained by the advocacy group Free the Hounds match the dogs' details in publicly available racing industry records. Canya Cruise, born on September 7, 2018, had a successful racing career with numerous starts and significant prize money. Similarly, Turbo Thomas, born on the same day as Canya Cruise, had a racing career with earnings of over \$54,000. They were both shipped to China under the guise of being a pet. Both dogs were entire and are being used for breeding.

Recommendation 1

CPG supports amending legislation to prohibit the export/import of greyhounds and their genetic material from/into Australia.

¹³<https://www.theguardian.com/world/2017/nov/10/australian-greyhound-owners-fined-over-exports-to-cruel-conditions-in-china>

¹⁴<https://www.smh.com.au/world/asia/the-fight-is-on-for-australian-greyhounds-abandoned-in-macau-20180724-p4ztaj.html>

¹⁵<https://truecrimenewsweekly.com/greyhounds-gone-for-greed-champion-dogs-ending-up-in-china-for-breeding-against-australian-racing-industry-rules/>

Animal welfare peak bodies support the amendments

CPG is not the only animal welfare organisation to support the amendments. The RSPCA also does not support the export of greyhounds and provides the following reasons in support of this position:¹⁶

- stress and injuries associated with long-distance transport
- lack of animal welfare legal protection in importing countries
- potential to enter the dog meat trade
- lack of a formal tracking system for dogs exported to other countries means that the fate of Australian greyhounds is currently unknown
- serious concerns about the apparent lack of formal rehoming/adoption programs in destination countries.

These concerns echo those CPG presents in this report. RSPCA stipulates the only exception to an export ban should be situations where the “greyhound is accompanying their owner as a recognised companion animal and where the greyhound will not be used for greyhound racing purposes (for racing or breeding).”

Sentient, Australia’s Veterinary Institute for Animal Ethics,¹⁷ has provided CPG with the following statement:

“Sentient opposes the export of any greyhound (including their reproductive material) for commercial, breeding or purported ‘companion animal’ or ‘support dog’ purposes because we have no way of knowing where these dogs will end up or how they will be treated. The evidence we do have confirms our fears that exported greyhounds are afforded no protection and are at risk of abuse and neglect in countries with poor (if any) animal welfare standards and no legitimate rehoming schemes. Allowing this export to continue is unacceptable.”

¹⁶<https://kb.rspca.org.au/knowledge-base/why-does-the-rspca-oppose-the-export-of-racing-greyhounds/>

¹⁷ <https://www.sentient.org.au/>

Additional amendments are required to protect greyhounds from harm

Exempting entire pet greyhounds from the export ban maintains an existing loophole

The example of Turbo Thomas and Canya Cruise and others mentioned above, demonstrates that there are Australian greyhound racing industry participants who are prepared to do what they need to access the lucrative export market.

Section 9ABA of the Bill specifies that an application can be made to the Minister or an authorised person seeking their permission to export pet greyhounds (paragraphs 2 - 10). The current wording allows applications to be in relation to entire greyhounds.

CPG is concerned that subparagraph 9ABA(3)(b) of the Bill, which requires the Minister or authorised person to be satisfied that the export is “not for the purposes of breeding, racing or any other commercial purposes”¹⁸, will maintain the loophole that was used to export Turbo Thomas and Canya Cruise, both being entire greyhounds.

CPG believes that there is no circumstance, under which a person would need to export an entire greyhound, that does not relate to breeding or other commercial purposes. Therefore, subparagraph 9ABA(3)(a) of the Bill, which specifies that only domestic pets can be exported, must be amended to require that the pet greyhound to be exported must be neutered at the time of application.

Recommendation 2

That 9ABA(3)(a) of the Bill be amended to allow permission for export of a pet greyhound only where the greyhound has been neutered.

The examples provided earlier in this report highlight the loopholes that exist and strategies applied to circumvent restrictions on exporting greyhounds. CPG is of the strong view that restricting greyhound exports to neutered dogs is the most effective strategy for closing these loopholes. CPG notes the requirement to keep certain records in relation to the export (paragraph 9ABA(11)), but notes also that there are no offence or penalty provisions for failing to meet these requirements. It is not clear what consequences an applicant would face for not complying with the record keeping requirements, other than loss of the permit. This would be irrelevant if the export has already happened. Therefore a requirement to neuter a pet greyhound prior to a proposed export must be met at the time of application.

¹⁸ legislation.gov.au/Details/C2021B00131

Recommendation 3

That section 9ABA of the Bill be amended to specify that an application seeking permission to export a greyhound, which does not include a veterinary certificate certifying the greyhound has been neutered, is not an application for the purpose of 9ABA(2).

Exempting entire pet greyhounds from the import ban may create an incentive for overseas greyhound breeders

Australia is one of the last few countries to legalise greyhound racing. As such it may be an attractive destination for greyhounds bred in conditions that would contravene animal welfare laws in Australian States and Territories. CPG believes that the Federal Government has an obligation to prevent this from happening. CPG therefore recommends that corresponding amendments be made to Part 2 of the Bill; i.e. restricting importation of greyhounds only to neutered dogs will provide an effective barrier to those seeking to profit from greyhounds bred in low- or no-welfare conditions.

Recommendation 4

That Part 2 of the Bill be amended to:

- allow permission for import of a pet greyhound only where the greyhound has been neutered, and
- specify that an application seeking permission to import a greyhound, which does not include a veterinary certificate certifying the greyhound has been neutered, is not an application for the purpose of paragraph 4WA(2).

Implementing an effective regulatory greyhound export/import scheme

Applying a precautionary approach to prevent greyhound welfare failures

A number of studies on the physiological effects of air travel on dogs, including greyhounds, have shown that it causes significant stress on the dogs. This includes studies on the relationship between container size and stress in greyhounds,¹⁹ studies on the effect of air transport on dog behaviour and physiology.²⁰ A comprehensive review of the literature, published in 2022, is instructive.²¹

Briefly, these studies show the following:

- During air transport, the stress hormone cortisol becomes elevated, the number of inflammatory immune cells increase and white blood cell counts decrease significantly. [These are the hallmarks of a stress response, which predisposes the greyhound to adverse impacts, such as reduced disease resistance.]
- Sedating the dogs does not reduce travel-related stresses.
- Loading into and out of planes results in elevated heart rate. This is especially pertinent to flights from Australia, which usually have more than one stop over.
- Smaller crates create difficulties of movement without reducing sliding, losing balance or hitting the side of the cage.
- Larger crates do not reduce stress levels.
- Habituating dogs to the travel container and travel method reduces stress.
- The post-travel 'settling down' period is directly proportional to the length of travel.

These studies involved relatively short travel times, mostly within Europe. As all air-travel from Australia is longer than the published studies, and usually involves more than one stop-over, export of greyhounds from Australia is a worst case scenario and further studies are needed to assess the impact on greyhound welfare. In particular, cheaper fares are available for flights with more than two or three stopovers, so CPG considers this to be a significant risk for greyhounds sent overseas. It is not clear how many stopovers freight carriers have compared with passenger airlines.

In the case of greyhounds we must consider the fact that during their racing career they were individually kennelled, with very little, if any, socialisation. Once a greyhound ceases to perform on the racetrack, they often do not receive the same level of care that an

¹⁹ <https://pubmed.ncbi.nlm.nih.gov/1926712/>

²⁰ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC227007/>

²¹ <https://www.tandfonline.com/doi/full/10.1080/1828051X.2022.2043194>

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actively racing dog does. This is based on the many years of experience gained by non-industry greyhound rehoming groups, who receive greyhounds directly from greyhound racing industry participants.²²

CPG notes that the wording of Paragraphs 9ABA(2) and 4WA(2), specifically the use of the plural 'greyhounds', suggest that an import or export application may include more than one greyhound. CPG is concerned that this opens the door to individual applications covering a large number of dogs.

It is well documented that the Australian greyhound racing industry breeds many times more dogs than can be rehomed.²³

The NSW greyhound industry currently exports large numbers of ex-racing greyhounds to the USA, where they are rehomed to service people suffering from PTSD.⁸ During January to June 2023, 205 greyhounds were exported to the USA²⁴. This compares with 63 greyhounds exported to the USA in the entire 2021-22 financial year. Although it is likely that not all of these dogs were exported as part of this Australian industry scheme, currently more Australian greyhounds are exported to the USA than any other country.²¹ CPG believes that the Australian greyhound industry will find other overseas organisations/partners with which to establish similar arrangements.

The scientific literature provides clear evidence that long distance air travel creates behavioural and physiological stresses in dogs. CPG believes that greyhounds recently retired from racing, who have not spent a significant time in a caring home to be socialised and adapt to the world outside of kennels, will be even more affected by these stresses. The long-term impacts of these stresses are unknown. The USA export program has not provided any information about how these dogs will be socialised pre-travel, what behavioural tests they must meet or how they will be habituated to air travel (a strategy recommended in veterinary research published in peer-reviewed scientific journals, e.g. see footnote 19 above). Nor have they provided information about greyhound welfare outcomes of the dogs already exported.

Indeed, at the time of preparing this report, one greyhound - Barcia Jazz - is confirmed to have died en route to the USA. An autopsy was conducted in the USA, but this has not been made available to allow independent Australian experts to validate the conclusion that the death was not related to transport. Nor has the airline's report into the death been released.²⁵

²² <https://greyhoundcoalition.com/exposing-the-issues/industry-neglect-of-greyhounds/>

²³ <https://greyhoundcoalition.com/exposing-the-issues/gaping-hole-in-rehoming-2021-update/>

²⁴ <https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/live-animal-export-statistics/greyhound-exports>

²⁵ <https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1820781676-92173>

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There is evidence that Australian greyhounds are being exported to countries banned by Greyhounds Australasia via non-banned countries, and that some of these greyhounds end up in the dog meat trade once they are injured or uncompetitive.²⁶

Given the history of this industry to abuse any loopholes and circumvent requirements for financial gain, and unknown effects of extended travel on greyhounds, it would be prudent for the Federal Government to include stringent requirements to avoid being caught up in any animal welfare issues that may arise from federally approved exports of Australian greyhounds.

CPG is concerned that the Bill, which currently does not restrict the number of greyhounds that can be included in an application for a Federal export permit, may oblige the Federal Government to consider and approve applications for large scale exports. Further, the reporting requirements specified in Paragraph 9ABA(11) do not include a requirement to keep records of lessons learnt from programs, such as the US export program. CPG recommends that a precautionary approach be taken and that a limit be specified on the number of greyhounds that can be included in an application seeking permission to export. This will allow the Minister to exercise powers specified in 9ABA(8) to place conditions on export and import permits, which can include requiring reports of greyhound welfare outcomes.

Once the greyhound owner has shown they are able to meet all their obligations and that greyhound welfare has been assured, applications for the export of more greyhounds could be accepted.

CPG believes these concerns also apply to the import provisions of the Bill and recommends a similar approach.

Recommendation 5

In implementing the proposed amendments to the Customs Regulations, mechanisms are specified in legislative instruments or regulatory policies that:

- limit the number of greyhounds that can be included in an export or import application, which provides no evidence about greyhound welfare outcomes
- require the applicant to report on the effectiveness of welfare risk management strategies and welfare outcomes before being able to apply for an export or import permit involving a larger number of dogs.

²⁶ <https://freethehounds.com.au/federal-bill-introduced-to-ban-greyhound-exports/>

The Federal Government must adequately resource the greyhound export/import control programs

This report has already provided evidence of cases where Australian greyhound owners were able to receive export permits even though they did not meet all requirements, such as Federal approval for the export even though they had not obtained a Greyhounds Australasia passport for the greyhound (eg. footnote 13 above). Other examples of the same gap in the system even involved greyhound racing regulator officials.²⁷

CPG is concerned about how easily Australian greyhound owners were able to gain approval to export entire greyhounds as pets, even though any greyhound rehomed as a pet via the industry's greyhound adoption programs is neutered before rehoming (eg. footnote 15 above). This indicates that the Federal Department of Agriculture Fisheries and Forestry, as the responsible agency for animal exports, did not undertake sufficient due diligence to prevent abuse of the system or ensure that industry requirements are met.

This report provides a sample of publicly available information showing that Australian greyhound industry participants have continued to exploit weaknesses and loopholes in the system to circumvent the industry's own bans on exports of Australian greyhounds to access lucrative overseas markets.

Recent media reports about cruelty against greyhounds, including live baiting, demonstrate the reputational risks to the Federal Government of not resourcing the implementation and operation of the amendments proposed in the Bill. CPG therefore urges the Federal Government to dedicate sufficient resources to ensure effective regulation and risk management.

Recommendation 6

In implementing the Customs Legislation Amendments, best practice regulatory principles are applied and sufficient resources are available to ensure effective risk management and regulation of greyhound exports and imports.

²⁷<https://www.theguardian.com/australia-news/2018/may/05/greyhound-racing-nsw-board-member-charged-over-unauthorised-export-of-dog>

International trade agreements are no barrier to implementing the Bill

CPG does not believe that international trade agreements should be a barrier to adopting and implementing the amendments proposed in the Bill and CPG's recommendations. Specifically, the General Agreement on Tariffs and Trade (GATT) provides that "Australia may enact regulations that effectively combat animal cruelty without overly obstructing free trade between nations".²⁸

The GATT does have a general commitment to reduce trade barriers, however, Article XX provides exceptions.²⁵ Australia may also utilise Articles XX(a) or XX(b) and contend that the greyhound exportation and importation ban is necessary to protect public morals and human, animal or plant life and health. Other alternatives are not reasonable nor productive and therefore are not "overly burdensome".²⁹ As the Bill would apply to greyhound exports to and imports from all other countries, it cannot be argued to be discriminatory.

²⁸ <https://digitalcommons.law.uw.edu/wilj/vol14/iss3/4/>

²⁹ https://www.wto.org/english/docs_e/legal_e/gatt47_01_e.htm