



## Coalition for the Protection of Greyhounds

# Submission on Planning Application MID-1021-0543 – Greater Brisbane Greyhound Centre

## Introduction

---

The Queensland Government is seeking submissions from interested parties on a planning application submitted by Racing Queensland.

The Coalition for the Protection of Greyhounds (the Coalition) undertakes research to provide the Australian public and State and Territory governments with accurate information about greyhound welfare and other matters associated with greyhound racing. For more information about the Coalition, including our White Papers and reports, such as the *Lethal Tracks* report, please visit <https://greyhoundcoalition.com/>.

The Coalition has members across Australia, including Queensland, and would like to thank the Queensland Government for the opportunity to make a submission on this planning application.

## Executive summary

---

The Coalition objects to this planning proposal on the grounds outlined below.

### Integrity of the planning process

We have significant concerns about the following aspects of the planning process:

- The public commitment of the Queensland Government to fund this development project.
- Greyhound race tracks are not an essential community infrastructure.
- The proposed development provides Queensland taxpayers with exceptionally poor value for money.
- The economic benefits to the Ipswich community have been exaggerated.
- Concerns about how the expenditure of significant state funds will be governed

## **Animal welfare**

We have significant concerns about the following animal welfare issues:

- The application does not have even one section dedicated to addressing animal welfare concerns.
- The stakeholder and community consultation strategy is inadequate.
- No greyhound track is safe – not even recently rebuilt tracks.
- Greyhound racing tracks designed, or advised on by the University of Technology Sydney (proposed to be engaged to design the tracks and lure systems) have poor safety records.
- There is no information about greyhound safety risks associated with aircraft, including RAAF, flying over the site during races.
- The proposal to make this a family friendly venue will cause long term harm to children who will witness the many horrific injuries that occur during greyhound racing.

## **Exacerbating Queensland's gambling problem**

We have significant concerns about the following gambling related issues:

- Exposing children to gambling, especially when it involves family members, normalises the behaviour and predisposes them to developing gambling problems.
- Another gambling venue will contribute to Queensland's growing gambling problem.
- Gambling is known to cause mental health problems that will impact on gamblers and their families.

## **Land clearing**

We have significant concerns about the proposal to clear native habitat that contains, or is likely to contain a number of endangered and vulnerable species, including the endangered koala.

## **Preserving Aboriginal cultural heritage**

We have significant concerns about the fact that the Traditional Custodians, the Yuggera Ugarapul people, have not been consulted despite a number of sites of significant cultural importance identified in the surrounding area, and likely to be present on the site itself.

# Concerns about Planning Application MID-1021-0543

## 1. Integrity of the planning process

---

### Objection 1a. The Queensland Government has made a public commitment to fund the Greater Brisbane Greyhound Centre

On 18 October 2019, the Minister for Local Government, Minister for Racing and Minister for Multicultural Affairs announced that the Queensland Government will build greyhound racing tracks at Purga, outside of Ipswich and that \$39 million has been committed for this project.<sup>1</sup>

The title of this statement is instructive: *New greyhound centre races into SE Queensland*. The Queensland Government has therefore stated a clear intent to make this greyhound racing facility happen at significant cost to Queensland taxpayers, before any consultation was undertaken.

Since then, over 70,000 Queenslanders have expressed their opposition to this racetrack.<sup>2</sup>

With this level of opposition, the project would not have passed the council process for developments. Instead, the Queensland Government's Planning Minister has given this project an infrastructure designation which allows it to control the outcome of the planning approval process.

### Objection 1b. Greyhound race tracks are NOT an essential community infrastructure

The 2016-17 *Queensland Household Gambling Survey*<sup>3</sup> shows that only about 18% of Queenslanders gamble on horse racing, harness racing and greyhound racing. In this report it was noted that the survey was conducted around the Melbourne Cup period, which almost certainly resulted in an overestimate of this gambling group.

As only a small proportion of Queenslanders engage with greyhound racing, the Coalition repudiates the Queensland Government's Planning Minister's decision to give this project an infrastructure designation. It is unreasonable to consider a greyhound racing track an essential community infrastructure.

### Objection 1c. This project provides Queensland tax payers with exceptionally poor value for money

Data from the 36<sup>th</sup> edition of the *Australian Gambling Statistics*<sup>4</sup> shows that the Queensland Government revenue from horse racing, harness racing and greyhound racing was \$9.698 million in 2017-18.

The greyhound racing industry contributes only a very minor contribution to the Queensland Government, especially as it returns 35% of revenue from the Point of Consumption Tax back into the industry. Taken together with the points we make in Objection 1d, investing \$40 million into this project would provide exceptionally poor value for money.

---

<sup>1</sup> <https://statements.qld.gov.au/statements/88652>

<sup>2</sup> <https://www.change.org/p/annastacia-palaszczuk-reconsider-spending-40mil-on-a-new-greyhound-racing-complex-in-ipswich>

<sup>3</sup> <https://www.publications.qld.gov.au/dataset/liquor-and-gambling-research/resource/4267f3c2-950b-407e-b88f-d31e116cedcb>

<sup>4</sup> <https://www.qgso.qld.gov.au/statistics/theme/society/gambling/australian-gambling-statistics>

## **Objection 1d. The economic benefits to the Ipswich community have been exaggerated**

In the Queensland Government's media release announcing that it will build this greyhound racing track, the claim is made that:

*"Annually, greyhound racing contributes more than \$125 million to the Brisbane and Ipswich economies and supports almost 1000 full-time jobs."*

Data provided in Chapter 7 of the Australasian Gaming Council's *A Guide to Australasia's Gambling Industries*<sup>5</sup> shows that in 2014, the Australian greyhound industry employed a total of 7,589 trainers and attendants nationally.

Although this figure does not include other employees, it is clear that the stated figure is an exaggeration of the number of full-time jobs at the greyhound racing tracks in the Brisbane region. The Coalition invites the Queensland Government to provide evidence for the nearly 1,000 full-time jobs associated with greyhound racing in Ipswich and the Brisbane region.

The Coalition rejects the Queensland Government's claim that this industry contributes more than \$125 million to the Ipswich and Brisbane region annually because revenue generated by this industry is largely from money lost by gamblers. The Coalition invites the Queensland Government to clarify how much of their claimed figure was taken from Ipswich and Brisbane gamblers.

## **Objection 1e. How will expenditure of Queensland Government funds be governed?**

As shown in Objection 1a, the Queensland Government has committed to fund this project to the amount of almost \$40 million.

However, the applicant is Racing Queensland. The property subject to this application is a privately owned property operated by Racing Queensland for the purpose of greyhound racing.

The application provides no information about who will make decisions about spending the \$40 million to be provided by Queensland taxpayers. For example, who will make decisions about which materials to procure for building the racetrack, or which builders and other contractors to engage, etc. Will Queensland Government procurement guidelines apply? How will these expenditures be reported to the Queensland taxpayer? What governance structures will be implemented to ensure the integrity and probity of all procurements and contract arrangements?

An application that involves the expenditure of a significant amount of Queensland taxpayer funds must include information to assure Queensland taxpayers that their funds will be spent to ensure maximum value for money, proper accountabilities and prevent conflicts of interest. This application does not provide this information.

---

<sup>5</sup> <https://austgamingcouncil.org.au/fact-centre/agc-guide-industry>

## 2. Animal welfare

---

### **Objection 2a. The Racing Queensland application does not address animal welfare concerns**

Racing Queensland's application for a Ministerial Infrastructure Designation does not have even one section dedicated to providing evidence of how the proposed racing track will prevent greyhound track deaths and injuries.

Animal welfare considerations are covered in a very cursory manner in the Stakeholder and Community Engagement appendix of the application. The application fails to provide information about how greyhound welfare will be assured, including:

- No data on greyhound injuries and deaths on the existing tracks is provided.
- No information about track design, other than a statement that the University of Technology Sydney (UTS) will be engaged for this part of the project. We provide evidence that UTS designed tracks have failed to ensure the safety and welfare of greyhounds, and cite UTS publications that show even their best researched track design will not avoid track deaths (see objections 2c and 2d).
- Why is only one of the three tracks a straight track?
- How will deaths and injuries be prevented in catching pens? Reference is made to the University of Technology Sydney (UTS) considering this but no information provided. Given the UTS staff involved in this are specialised in safety (e.g. playgrounds) and engineering, and not in greyhound biology, it is difficult to see the value they will add here. Their theoretical approach and lack of real world experience has been noted even by the greyhound racing industry.<sup>6</sup>
- No information about lure design or other risk factors and how they will be managed. A general reference is made to recommendations from Professor David Eager (UTS) about lure design; however, this is indicated as being negotiable. Therefore, this cannot be relied on.

The scarcity of greyhound welfare information in this application demonstrates Racing Queensland's negligent attitude toward the welfare of greyhounds on its tracks. Given the track record of this industry, the community deserves to be better informed about these matters.

### **Objection 2b. The application Stakeholder and Community Consultation Strategy is inadequate**

The Coalition is concerned about the inadequacy of the Stakeholder and Community Engagement Strategy. Specifically, a single 'token' animal welfare organisation, the RSPCA, was consulted. Queensland has a number of prominent animal and greyhound-specific welfare groups, such as Animal Liberation Queensland, Friends of the Hound, Coalition for the Protection of Greyhounds and others.

The application therefore provides very limited information about views that animal welfare groups have on this project. This tokenistic approach is unacceptable for a project of this size and given the animal welfare issues associated with greyhound racing.

---

<sup>6</sup> <https://australianracinggreyhound.com/news/traralgon-a-risky-guide/119868/>

The Coalition notes also the very limited engagement with Ipswich community groups, and in particular the failure to engage the Traditional Owners of the land subject to the development proposal, the Yuggera Ugarapul people. This application therefore has failed to address a key requirement of the Ministerial Infrastructure Designation process.

## Objection 2c. No greyhound racing track is safe

We note general statements made about designing the tracks in accordance with latest theoretical designs. However, the evidence is clear that deaths and injuries continue even on recently upgraded greyhound race tracks<sup>7</sup>:

- **Traralgon VIC**
  - \$6 million rebuild, opened January 2022.
  - Uses a “state-of-the-art” J-curve layout designed by Professor David Eager (UTS), with the “highest of safety and animal welfare standards.”
  - In the first seven race meetings, 37 greyhounds were injured. 12 were injured in one race meeting alone, one of the worst meetings nationwide over the last two years.
- **Horsham VIC**
  - \$800,000 track upgrade opened August 2017.
  - Touted as a UTS project that “showcases design features that put greyhound safety first”.
  - Since 2020, four greyhounds have been killed and 296 injured.
- **Grafton NSW**
  - \$4.6 million major redevelopment.
  - New racetrack designed in consultation with safety engineers at UTS.
  - Since racing restarted in June 2021, two deaths and 119 injuries (including 22 major injuries) have been recorded in only 44 race meetings.
- **Angle Park SA**
  - \$3m upgrade, completed in August 2021.
  - Greyhound Racing SA CEO said the track “*features a layout that sets the standard for modern best-practice design,*” and is “*based on track safety research commissioned by the industry, and undertaken by the University of Technology Sydney.*”
  - Since August 2021 four greyhounds have been killed and 109 injured.
- **Taree NSW**
  - \$455,000 safety upgrade to make bends of oval track safer.
  - Since opening in March 2021, four greyhounds have died on the track.
  - The injury rate has worsened since the upgrade: 4.1 injuries per race meeting in 2021 compared with 3.8 in 2020.
- **Straight Tracks in Australia**
  - Death and injury rates on straight tracks might be lower than on curved track, but they still kill and harm greyhounds:
    - Healesville VIC 2020 – Jan 2022: 2 deaths, 679 injuries
    - Capalaba QLD 2020 – Jan 2022: 4 deaths, 275 injuries

---

<sup>7</sup> The Coalition uses Stewards Reports to collate information about greyhound track deaths and injuries, see <https://greyhoundcoalition.com/lethal-tracks-reports/>

## **Objection 2d. UTS is not able to design safe greyhound racing tracks**

We note the proposal to engage Professor David Eager (UTS) in the design of the tracks. In Objection 2c we provide evidence that all greyhound racing tracks designed by the UTS team have a poor safety record, as evidenced by the many injuries and deaths that have occurred on these tracks.

Some members of the greyhound racing industry itself have publicly criticised the UTS team's track design and noted that greyhounds continue to "crash and burn"<sup>8</sup> on these tracks.

Indeed, research published by Professor Eager's group in a peer reviewed scientific journal<sup>9</sup> shows that even when they designed oval tracks to reduce physical stresses on greyhound bodies, the rate of catastrophic and major injuries are reduced only marginally: 4.22 per 1000 race starts compared with 4.58 before the upgrade.

Therefore, the assumptions made by the applicant on how they will ensure greyhound welfare are fundamentally flawed.

## **Objection 2e. Impact of aircraft noise on greyhound behaviour**

The application shows that noise insulation will be needed to reduce aircraft noise in greyhound kennels. However, the application is silent on how aircraft noise, especially RAAF aircraft, will impact on greyhound behaviour while racing. In the absence of such information, it is reasonable to assume that such loud noise will impact on greyhound behaviour on the track in a manner that will cause more injuries and deaths.

This is another flawed element of the application: on the one hand they acknowledge the disruptive effect of aircraft noise on greyhounds by designing kennels with noise insulation. On the other hand, the applicant makes no effort to provide evidence about how such noise might impact on the risk of injury during a race.

## **Objection 2f. Witnessing animal cruelty has long lasting impacts on children**

Over the past 40 years or so, the literature on the impact that witnessing actions that result in the unnecessary harm or death of animals has on children and adolescents has grown. There are now a number of metastudies and reviews of this literature.<sup>101112</sup> The studies evaluated in the cited studies include Australian studies, therefore they are relevant to this application.

Racing Queensland aims to make the Greater Brisbane Greyhound Centre a family and community space with restaurants, playgrounds and venues for other sporting activities. This means children and adolescents will be exposed to greyhound races. The evidence provided above and in Coalition publications, such as *Lethal Tracks*, shows that even with upgraded tracks, every year thousands of greyhounds are injured and hundreds die during races.

---

<sup>8</sup> <https://australianracinggreyhound.com/news/traralgon-a-risky-guide/119868/>

<sup>9</sup> Hossain, M.I., Eager, D. & Walker, P.D. Greyhound racing ideal trajectory path generation for straight to bend based on jerk rate minimization. *Sci Rep* **10**, 7088 (2020). <https://doi.org/10.1038/s41598-020-63678-1>

<sup>10</sup> Ladny RT, Meyer L. Traumatized Witnesses: Review of Childhood Exposure to Animal Cruelty. *Journal of Child and Adolescent Trauma*. 2019;13(4):527-537. Published 2019 Jul 30 doi: [10.1007/s40653-019-00277-x](https://doi.org/10.1007/s40653-019-00277-x)

<sup>11</sup> Laura M. Wauthier & Joanne M. Williams (2021) Understanding and Conceptualizing Childhood Animal Harm: A Meta-Narrative Systematic Review, *Anthrozoös*, Published 2021 October DOI: [10.1080/08927936.2021.1986262](https://doi.org/10.1080/08927936.2021.1986262)

<sup>12</sup> Kelly L. Thompson and Eleonora Gullone An Investigation into the Association between the Witnessing of Animal Abuse and Adolescents' Behaviour toward Animals. *Society and Animals*, Vol14 No3: 221-244.



Many of these injuries involve broken limbs, which are painful and will result in pain responses by greyhounds. It is very confronting to see a greyhound with a compound fracture trying to finish a race, or struggling to stand after a fall.

It is therefore a certainty that making greyhound racing a family event will result in children and adolescents being exposed to the animal cruelty associated with greyhound racing. The above metastudies are just a sample of the hundreds of peer reviewed scientific and clinical studies that show that normalising animal cruelty can have the following long-term to life-long effects on children:

- Various maladaptive behaviours in children, such as aggression and violence, which may continue throughout the individual's lifespan.
- Re-enactment of the observed cruelty, especially if it was associated with a family member.
- The age at which these behaviours manifest is directly related to the age of the child being exposed to unnecessary harm or death of an animal.
- Most concerning is the consistent observation that children exposed to both domestic violence as well as experiences that normalise injuries and deaths of animals are much more affected. These children subsequently manifest more severe maladaptive behaviours than children who experience only one of these traumas.

The Coalition objects to the Racing Queensland application on the grounds that the proposed Greater Brisbane Greyhound Centre will produce long-term or life-long maladaptive behaviours in children, which will impede their emotional development, education and career options.

### 3. Exacerbating Queensland's gambling problem

---

#### Objection 3a. Making the next generation of gamblers

Racing Queensland's application describes a family friendly facility with playgrounds and has a focus on family and community participation and attracting people to non-greyhound racing facilities and events planned for the site.

Research has established that early exposure of children to gambling normalises the behaviour and can lead to long term gambling problems. A well accepted and proven preventive strategy is to avoid such exposure.<sup>13 1415</sup>

Further, research has shown that socio-cultural factors, such as the influence of family members, and peers, play important roles in facilitating children's gambling behaviours. Researchers have also demonstrated that children's first formal contacts with gambling are often via parents or family members. Children who believe that their parents gamble are more likely to want to try gambling themselves, and have higher rates of gambling.<sup>1617</sup>

---

<sup>13</sup> <https://link.springer.com/article/10.1007/s11469-019-00103-3>

<sup>14</sup> <https://aifs.gov.au/media-releases/restrict-childrens-exposure-gambling-advertising>

<sup>15</sup> <https://www.responsiblegambling.nsw.gov.au/about-gambling/how-gambling-and-gaming-impacts-children>

<sup>16</sup> <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-017-0136-3>

<sup>17</sup> <https://aifs.gov.au/media-releases/early-exposure-gambling-risk-factor-later-addiction>



These studies are unanimous in recommending that Governments must develop effective policies and regulations to reduce children's exposure to gambling products and ensure they are protected from the harms associated with gambling. This has led to the prohibition of children in gambling facilities such as casinos and venues with electronic gaming machines.

The Greater Brisbane Greyhound Centre therefore, as proposed by Racing Queensland in its application, would promote exactly the kind of childhood exposures that would normalise gambling in children and create future problem gamblers.

### **Objection 3b. Queensland's gambling problem is getting worse**

The *2016-17 Queensland Household Gambling Survey* shows that 3% of Queenslanders are either problem gamblers (0.5%) or moderate risk gamblers (2.5%). Further, this report shows that the number of problem gamblers grew from 0.37% of the population in 2008-09 to 0.51% in 2016-17 - an increase of 38%. According to 2016 Australian Census Data, the Queensland population in 2016 was 4,703,193. This means that 23,986 Queenslanders were problem gamblers and 117,580 Queenslanders were moderate risk gamblers.

The *2016-17 Queensland Household Gambling Survey* also shows that 47% of moderate risk gamblers and 48% of problem gamblers bet on horse races, harness races or greyhound races. Participation rates for low risk or recreational gamblers is statistically significantly less at 37.4% and 23.6% respectively. However, more concerning is the high number of bets that moderate risk and problem gamblers place on racing events:

- Moderate risk gamblers: 18.8% place 53 or more bets per year, 18.3% place 25-52 bets per year.
- Problem gamblers: 13.2% place 53 or more bets per year, 22.9% place 25-52 bets per year.

Research published by the Australian Institute of Family Studies shows that 21.9% of race bettors experience moderate to severe gambling problems and those who gamble on horse racing, harness racing and greyhound racing are more likely to live in households that experienced financial problems. 41% of all regular race bettors experienced one or more gambling-related problems. That is, their gambling behaviour caused, or put them at risk of problems. This was more than double the rate among regular gamblers nationally.<sup>18</sup>

According to application information provided, Racing Queensland plans to run a large number of greyhound racing events at the proposed site. Published research shows that this will exacerbate existing gambling problems and consequential impacts on families and the community more broadly. Ipswich as a community is vulnerable to the sociological and financial impacts of gambling because its low Socio-Economic Index For Areas score of 961.<sup>19</sup> By comparison, the SEIFA score for the Brisbane LGA is 1048, which shows that Ipswich has a much higher level of socioeconomic disadvantage.

### **Objection 3c. Mental health impacts of gambling in Queensland**

The *2016-17 Queensland Household Gambling Survey* shows that 51.7% of problem gamblers have suffered depression in the previous 12 months. That is more than double the rate in moderate and low risk gamblers.

---

<sup>18</sup> <https://aifs.gov.au/agrc/publications/race-betting-australia>

<sup>19</sup> <https://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/2039.0Main%20Features42006>

Equally concerning is the data in that report that shows that the percentage of problem gamblers who sought professional help in the previous 12 months dropped from 28.4% in 2006-07 to 20.0% in 2016-17.

Instead of spending \$40 million on a facility that will exacerbate Queensland's gambling problem, the Queensland Government should fund better mental health and other support services for problem gamblers and other Queenslanders suffering from mental health issues.

## 4. Land clearing

---

### Objection 4. Protecting core koala habitat

The site contains koala habitat of national and state significance and critical to the survival of the species, scoring eight out of a maximum of 10 points using the Koala Habitat Assessment Tool. The Australian Government has recently declared the Koala an endangered species on the East Coast of Australia, which includes the site subject to Planning Application MID-1021-0543 – Greater Brisbane Greyhound Centre.<sup>20</sup>

The site is only ~3.5km from the Flinders Goolman Core Habitat Area identified within the City of Ipswich Koala Conservation and Habitat Management Plan. Koalas have been spotted within the Flinders Goolman CHA on the northern boundary.<sup>21</sup>

The Environmental Assessment Report provided as part of the application shows that there have been reported koala sightings inside the property boundary, and 253 recorded koala sightings within a 2km radius, and 53 sightings within 1km.

Around 20 mature koala habitat trees will need to be removed to facilitate the development. While the applicant proposes to offset this by revegetating other areas of the site, it takes considerable time for trees to mature.

Given that about 900 Queensland koalas perished in the Black Summer fires of 2019-20<sup>22</sup>, and a significant proportion of koala habitat was destroyed, every remaining core koala habitat must be preserved.

The Environmental Assessment Report shows that the koala is only one of the vulnerable or endangered species present, or likely to be present, within the development site. Given the increased presence of humans and hundreds of dogs, the area will likely cease to be any kind of refuge for native animals.

---

<sup>20</sup> <https://www.awe.gov.au/environment/biodiversity/threatened/species/koala>

<sup>21</sup> [https://www.ipswich.qld.gov.au/about\\_council/initiatives/environment/wildlife/koala-conservation](https://www.ipswich.qld.gov.au/about_council/initiatives/environment/wildlife/koala-conservation)

<sup>22</sup> <https://www.wwf.org.au/news/news/2020/wwf-60000-koalas-impacted-by-bushfire-crisis#gs.ok2fen>

## 5. Preserving Aboriginal cultural heritage

---

### Objection 5. Proximity of culturally significant sites

The Aboriginal Cultural Heritage Database shows eight registered sites adjacent to the subject site, each with artefact scatters.

There are a further two sites nearby that are of great spiritual and cultural importance to the Yuggera Ugarapul people, including the former Deebling Creek Mission, the Purga Aboriginal Cemetery.

In relation to consulting with the Traditional Owners of the site, the Stakeholder and Community Engagement Plan includes the following:

*“Yuggera Ugarapul People notified via Marrawah Law Pty Ltd (6 July 2021 – see Appendix E) of the project, invited to site meeting and ongoing discussions to organise suitable date for on-site meeting (delayed due to COVID restrictions, but anticipated to be in mid-late August 2021).”*

Given the consultation opened in January 2022, this consultation should have occurred, but the application provides no information.

The Cultural Heritage Impact Assessment reports that undocumented, tangible Aboriginal and non-Aboriginal historic cultural heritage items may be present within the project area. Given this uncertainty and the inadequate consultation undertaken, the Coalition objects to this planning project.

Ipswich City Council’s Indigenous Accord 2020-2025<sup>23</sup> recognises and acknowledges the rights of the Traditional Owners to be a central stakeholder in decision-making about the lands, regions, places and natural resources of Ipswich. The Queensland Government should behave in accordance with these principles and include Traditional Owners in decisions about their land.

---

<sup>23</sup> <https://www.ipswich.qld.gov.au/live/our-community/indigenous>