

Proposed new Qld Local Rules of Racing: LR11A, LR11B and LR11C



Introduction

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.

The CPG appreciates this opportunity to provide feedback on the introduction of new greyhound Local Rules of Racing by Racing Queensland. These are Rules LR11A, LR11B and LR11C relating to **Rehoming of a greyhound, Euthanasia of a greyhound, Abandonment of a greyhound.**

CPG is pleased to see that Racing Queensland is attempting to reduce the very high levels of unnecessary euthanasia of dogs in the Queensland greyhound racing industry. However, CPG is concerned that the rules do not provide sufficient information to ensure that participants understand their responsibilities or explain how the rules will be enforced.

The rules need to be particularly specific around the euthanasia of greyhounds as "*not suitable for rehoming*" and dogs who are sent to "*surrendered to other agencies*". The number of dogs in these categories has been consistently high over the last years as reported in the QRIC Greyhound Breeding, Race Injury and Retirement Quarterly Reports.

CPG is also concerned about participants still being able to rehome privately to third parties. As Racing Queensland does not have birth-to-death tracking of greyhounds, there is no mechanism to manage the whereabouts or wellbeing of these dogs.

A consequence of these rules will be a significant increase in the number of Queensland greyhounds needing homes after they leave the industry. It is unclear how Racing Queensland will address this issue particularly given uncertainties around the future of some Queensland GAPs.

Below are specific recommendations relating to the three new rules.

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LR11A Rehoming of a greyhound

QRIC quarterly reports for FY23 show 123 greyhounds were “*surrendered to other agency*”. The report states “*The category of “surrendered to other agency” does not refer to dedicated adoption or rehoming agencies and includes universities and veterinary practices. Euthanasia and adoption data from these agencies are not currently available.*” A specific prohibition should be added to LR11A stating that no greyhound should be surrendered to any agency not specified in LR11A(3) including but not limited to universities and veterinary practices.

This is in line with the following statement in the Consultation Notice for these rules: “*RQ and the QRIC believe that, wherever possible, suitably healthy greyhounds leaving the industry should have the opportunity to live out their natural lives as companion animals*”.

LR11A(3) states that greyhounds can be rehomed to “*another rehoming agency approved by the Controlling Body*”. This is a concern as there are a number of volunteer-based greyhound specific rescue groups with no current affiliation or connections to QRIC. In addition there are many non-breed specific dog rescue groups that also take in ex-racing greyhounds from time to time. The requirement for registration by QRIC is likely to be an affront to some volunteers, and potentially volunteer rehoming organisations, who will not wish to be subjected to a registration process by the industry regulator.

It is worth noting that in the previous financial year, 190 greyhounds were retired to adoption programs other than GAP. Any reduction in the number of programs and/or individuals available to rehome Queensland greyhounds will have a major impact on rehoming rates and the backlog of ex-racing dogs awaiting rehoming.

Recommendation 1

That LR11A(3) be amended as follows:

- replace “*another rehoming agency approved by the Controlling Body*” with “*another rehoming agency registered with the Australian Charities and Not-for-Profits Commission*”.

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LR11A(3) also states that greyhounds can be rehomed to “*an appropriate third party*”. Guidelines should be included in this rule as to what constitutes an “*appropriate*” third party. Given the lack of tracking of greyhounds given away or sold in this way, a definition of third parties (that are not captured by the definition of rehoming body) must be developed and published by QRIC. The specific aim of this definition is to prevent the practice of transferring a greyhound to a third party who then ‘disappears’ the greyhound.

Further, LR11A does not include any reporting requirements. In the absence of such, it is not clear exactly how QRIC Stewards will determine if any transfer or rehoming is “*appropriate*”. CPG is concerned that this opens the door to greyhounds being transferred to third parties that will “disappear” the greyhound. This could include outright killing of the dog, or letting the dog die of neglect. There are a number of examples in QRIC’s published information showing that greyhounds have been rehomed to a third party without notice, and where QRIC did not, or was unable to, ascertain the current whereabouts and health status of these greyhounds.¹

This raises concerns that QRIC does not have enough resources to ensure compliance; QRIC Stewards do not have enough powers to investigate the location and health of greyhounds transferred to third parties without notification and the penalties for such offences do not have enough deterrent effect.

In considering the risk of not addressing this issue, CPG notes the industry’s tendency to offload any greyhound that is not earning. This is particularly the case with industry members with limited resources, especially older members who receive government pensions (and many, if not most, industry participants are older than 60). In those circumstances it would be a significant risk that any non-racing greyhound that cannot be immediately rehomed be “disappeared”. Currently, these cases are prosecuted under administrative racing rules. CPG notes that Greyhounds Australasia Rule 34(5)(a) does not include a requirement to notify who the greyhound was transferred to. CPG strongly believes that any case where a greyhound cannot be traced to its current owner should be treated as an animal cruelty offence, with significantly higher penalties and mandatory suspension periods.

¹ <https://qric.qld.gov.au/wp-content/uploads/2022/06/Stewards-Report-Tony-Parry-1.pdf>,
<https://qric.qld.gov.au/wp-content/uploads/2023/07/Stewards-Report-Jay-Schafer-2023.pdf>,
<https://qric.qld.gov.au/wp-content/uploads/2023/06/D-Sutton-Stewards-Report-01a.pdf>

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Recommendation 2

a) That LR11A be amended to specify that a greyhound can be rehomed to a third party, that is not registered with *Australian Charities and Not-for-Profits Commission*, only when the following conditions have been met:

- the registered owner of the greyhound provides QRIC with 1) contact information for the person or organisation proposing to rehome the greyhound, and 2) a statement from the person or organisation that they have the financial means to provide for the greyhound's care and upkeep and that they will keep records about where the greyhound is rehomed
- QRIC, after assessing the provided information, approves the transfer of the greyhound.

b) That the *QRIC Greyhound Racing Penalty Guidelines 2023* be updated to include a fine of \$5,000 and a minimum of 12 months disqualification for each dog rehomed without meeting the above requirements.

LR11B Euthanasia of a greyhound

QRIC Greyhound Breeding, Race Injury and Retirement Quarterly Reports for FY23 show that 150 greyhounds were euthanased "due to not suitable for rehoming" and four euthanased "due to not suitable for racing". "not suitable for rehoming" was the highest category in greyhound mortality notifications. Given this, a specific prohibition should be added to LR11B stating that greyhounds cannot be euthanased due to issues with rehoming or racing except under the conditions specified in LR11B (2)(a)-(d).

This is in line with the following notification in the [QRIC Q4 FY23](#) quarterly report: "From July 2023, the GAP changed its position to euthanise in prey drive. A new behaviour management specialist has entered the program and contemporised the behaviour management program to prevent the need to euthanase for behavioural reasons."

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LR11B (2)(a) states that euthanasia of a greyhound is not permitted unless *“a veterinarian has determined that the greyhound has an intractable condition, such that the greyhound’s ongoing quality of life is likely to be poor and the veterinarian considers euthanasia to be the most appropriate course of action;”*

The wording of this rule is problematic as it is too open to interpretation. For example definitions of ‘intractable’ according to the Collins online dictionary vary from difficult through to insoluble. ‘quality of life’ can also be defined in many different ways. More specific veterinary definitions should be added to this rule qualifying the physical, mental and/or emotional suffering of the greyhound that means euthanasia is the only option.

LR11B (4) states *“A person who breaches this Local Rule is guilty of an offence.”* The rule should state whether this is an offence under the law or under Racing Queensland regulations or both. Details of penalties should also be included to ensure participants are aware of the consequences of this offence.

Recommendation 3

That LR11B(2)(a) be amended by replacing the words *“a veterinarian has determined that the greyhound has an intractable condition, such that the greyhound’s ongoing quality of life is likely to be poor and the veterinarian considers euthanasia to be the most appropriate course of action;”* with the following:

- *“a veterinarian has diagnosed the greyhound with a disease, illness or medical condition that*
 - *is incurable; AND*
 - *is advanced, progressive and will cause death; AND*
 - *is expected to cause death within weeks or months, not exceeding 4 months; AND*
 - *is causing suffering to the greyhound that cannot be relieved in a manner that the veterinarian considers tolerable.”*

For clarity, all four elements of the condition must be met.

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LR11C Abandonment of a greyhound

While this rule specifies how an abandoned greyhound is to be managed, there is no mention of a penalty associated with this offence. A penalty should be included in the *QRIC Greyhound Racing Penalty Guidelines 2023* to ensure that participants are aware of the consequences of abandoning a greyhound.

Recommendation 4

That the *QRIC Greyhound Racing Penalty Guidelines 2023* be updated to include a penalty with significant deterrent effect; i.e. a fine of at least \$2,000 and disqualification from racing for a minimum of 6 months for each dog abandoned.

CPG contact information

CPG is keen to answer any questions you may have on this submission. Please email harryr@greyhoundcoalition.com.