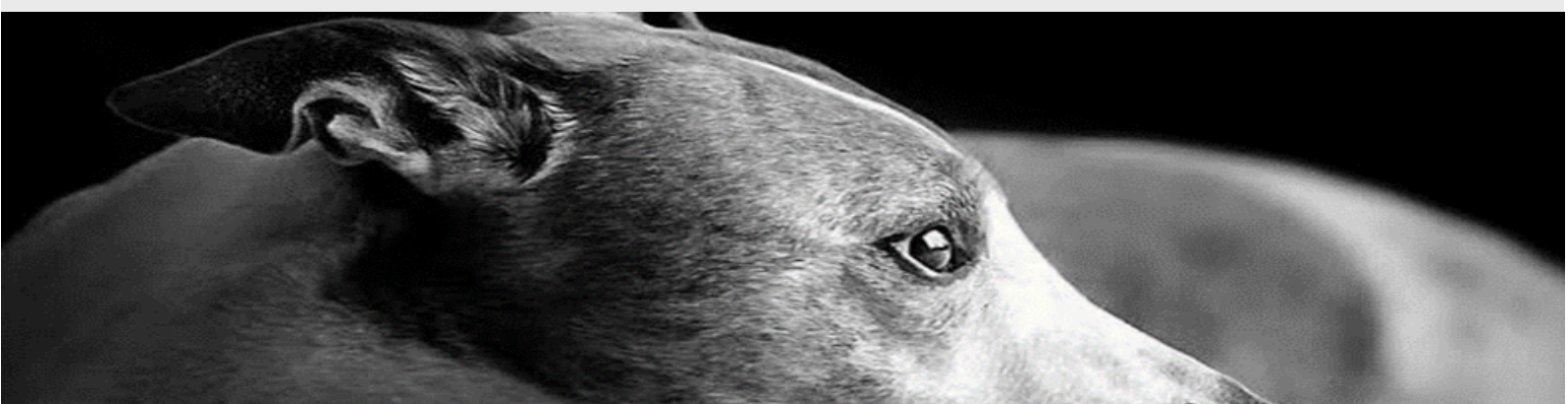




# Current state of greyhound racing regulation: Queensland



**Prepared by the Coalition for the Protection of Greyhounds  
September 2024**

*We acknowledge the traditional owners of Country across Australia. We pay our respects to Elders past, present and emerging and recognise the role Elders play in maintaining connection to Country, culture and community.*

**End greyhound suffering**

## About the Coalition for the Protection of Greyhounds

---

The Coalition for the Protection of Greyhounds (CPG) is a not-for-profit 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 call on Australia's state governments to:

**End 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.

**Stop 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.

**Implement 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.

**Establish 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) has undertaken an assessment of the effectiveness of the Queensland Racing Integrity Commission (QRIC) as the Queensland racing industry's independent regulator. In particular, CPG has focused on QRIC's application of sanctions and penalties in response to rule breaches, and on how well the Queensland racing industry treats and considers the welfare of the greyhounds that race on Queensland tracks.

In this report CPG has analysed and assessed the information that is publicly provided and reported by QRIC; specifically focusing on rule breaches concerning doping and animal cruelty.

Shortcomings identified by CPG include the following:

- **Decisions inconsistent with community expectations:** Attitudinal research clearly shows that the community expects wrongdoers to be punished when they transgress animal welfare requirements.<sup>1</sup> This report shows that in most cases, penalties issued by QRIC fall well short of those published in the QRIC *Greyhound Racing Penalty Guidelines 2023*, even for repeat offenders.
- **Inadequate Welfare Data:** Information regarding the retirement, rehoming, euthanasia, and death of greyhounds is significantly reliant on self-notification by owners and trainers. Examination of QRIC stewards' reports shows that there are gaps in this information, which means that death statistics are likely to be an underestimate, and greyhounds are being handed to third parties through unofficial channels, both of which are obvious welfare concerns.
- **Lack of transparency:** QRIC data about its performance is provided in its annual reports as aggregated data for all three racing codes, ie thoroughbred, harness and greyhound racing. This hides QRIC performance against greyhound racing rules and legal requirements and denies Queenslanders the opportunity to assess how well QRIC regulates the greyhound racing industry.

CPG makes the following recommendations:

### Recommendation 1

That the Queensland Government amend the *Racing Integrity Act 2016* by removing paragraph 3(1)(a) from the Act.

---

1

<https://theconversation.com/not-just-activists-9-out-of-10-people-are-concerned-about-animal-welfare-in-australian-farming-117077>

### **Recommendation 2**

That QRIC publish full details of the number and type of substance control samples taken for each racing code, including specifying which were taken on race days and those taken out of competition

### **Recommendation 3**

That QRIC develop and implement an intelligence-driven doping control program that is consistent with the approaches and strategies implemented by Sport Integrity Australia.

### **Recommendation 4**

That the Queensland Government amend the racing legislation to mandate penalties specified in the QRIC Greyhound Racing Penalty Guidelines 2023. For repeat offenders a penalty higher than the minimum penalty must apply.

### **Recommendation 5**

That the Queensland Government amend the racing legislation to:

- make the presence of a prohibited substance in a greyhound a strict liability offence, and
- allow for immediate provisional suspension of those presenting a greyhound with a prohibited substance.

### **Recommendation 6**

That the Queensland Government undertake a full review of an animal welfare case<sup>2</sup> to identify amendments to QRIC processes and/or the legislation or local rules of racing, to ensure that abused or neglected greyhounds identified by QRIC stewards receive immediate protection from further harm.

### **Recommendation 7**

That Local Rules be amended to require any person registered with QRIC who, by omission or direct action causes the death of a greyhound, or causes a greyhound to be in such condition that euthanasia is the only option, to be:

- referred to the relevant body for investigation and possible prosecution under the ACP Act,
- immediately suspended from any further participation in greyhound racing while the investigation and prosecution is in progress, and
- banned for life from any involvement in greyhound racing if convicted under the ACP Act.

### **Recommendation 8**

That QRIC implement:

- a genuine whole-of-life tracking system that records the whereabouts of every greyhound from the day it is born to the day that it passes on,

---

<sup>2</sup> <https://qric.qld.gov.au/wp-content/uploads/2022/11/Stewards-Report-Laurence-Thomas-2022.pdf>; <https://qric.qld.gov.au/wp-content/uploads/2022/11/Stewards-Report-Susan-Thomas-2022.pdf>

- a kennel inspection program that includes intelligence driven inspections, including more frequent unannounced inspections of industry participants who have breached any racing rule,
- mandatory necropsies of greyhound carcasses found on premises, and
- thorough investigations to ascertain the location and well-being of greyhounds claimed to be transferred to third parties without any supporting evidence.

### **Recommendation 9**

That revised rule LR11A be amended to include the following:

*“participants are no longer allowed to surrender retired greyhounds to a Queensland or interstate facility that conducts animal research, teaching or training, animal plasma or blood collection. This includes those facilities that also offer a rehoming program”.*

### **Recommendation 10**

That revised rule LR11B(2)(a) be amended by replacing the words *“(a) a veterinarian has recommended euthanasia on humane grounds, or determined that the greyhound is unsuitable for rehoming on medical or behavioural grounds, meaning: (i) the greyhound has an intractable condition or serious injury, 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 in the circumstances; or (ii) the greyhound has been temperament assessed by the veterinarian and found to display behaviour consistent with an unacceptable risk of aggression towards people or other animals;”* 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.

### **Recommendation 11**

That QRIC publish comprehensive information about its regulatory performance for each racing code.

### **Recommendation 12**

That QRIC publish comprehensive information about how they perform as a regulator of the greyhound racing industry and how well they ensure the welfare of greyhounds that race in Queensland. The information gaps identified in this report must be addressed.

### Governance, entities and legal frameworks

---

In March 2015, the Minister for Sport and Racing initiated a three-month System Review into the regulation of the Queensland greyhound racing industry. The Queensland Commission of Inquiry returned its final report on the greyhound racing industry on 1 June 2015. This report, known as the *MacSporran Report* after Commissioner Alan MacSporran, recommended a number of changes to the industry.<sup>3</sup>

Within the same month, the Queensland Government provided a response to the report, in which they accepted all 15 recommendations and set out a plan to ensure necessary reforms were made to the racing industry. Included as a recommendation was the separation of the commercial and integrity aspects of the industry. This recommendation was implemented as of 2016 and currently enables Racing Queensland (RQ) to act as a control body and concentrate on the business of racing, while the newly formed QRIC focuses on ensuring integrity within the industry.<sup>4</sup>

### Laws, rules, codes

The following are the main laws, rules and acts that apply to the Queensland Greyhound Racing Industry:

- *The Racing Act 2002* <sup>[5]</sup>
- *The Racing Integrity Act 2002* <sup>[6]</sup>
- *Greyhound Australasia Rules (GAR)* <sup>[8,9]</sup>
- *Local Rules of Racing - Greyhounds* <sup>[10]</sup>
- *Animal Care and Protection Act 2001* <sup>[11]</sup>
- *Criminal Code Act 1899* <sup>[12]</sup>

The three Queensland racing codes, thoroughbred, harness, and greyhound, are regulated under two Acts of Parliament, the *Racing Act 2002*<sup>5</sup> administered by the Department of Education, and the *Racing Integrity Act 2016*<sup>6</sup> administered by the Department of Agriculture and Fisheries.

---

<sup>3</sup> <https://qric.qld.gov.au/wp-content/uploads/2023/08/final-report-1-june-2015.pdf>

<sup>4</sup> <https://qric.qld.gov.au/about-us/publication-scheme/about-us/the-macsporrans-report/>

<sup>5</sup> <https://www.legislation.qld.gov.au/view/pdf/inforce/current/act-2002-058>

<sup>6</sup> <https://www.legislation.qld.gov.au/view/pdf/inforce/2016-05-01/act-2016-012>

### Racing Queensland

The *Racing Act* establishes the Racing Queensland Board (RQB) as the control body for the three codes of racing, with responsibility for the management, operation, development, and promotion of the racing industry in Queensland.<sup>7</sup> RQB therefore, is essentially the commercial platform used to provide for the management, operation, development, and promotion of the racing industry in Queensland.

The primary function of RQ is to perform in a manner that best suits the interests of the three codes of racing collectively, while still having regard to the individual interests of each code.<sup>8</sup>

### Queensland Racing Integrity Commission (QRIC)

The *Racing Integrity Act* was introduced in 2016 and establishes QRIC as the body to safeguard the welfare of racing animals and ensure the integrity of animal racing.

### Regulatory approach and framework

The *Racing Integrity Act 2016* is administered by the Queensland Department of Agriculture and Fisheries (DAF) and is the primary legislation governing QRIC's business. In addition, the *Animal Care and Protection Act 2001* and the *Criminal Code Act 1899* contain a broad range of offences to protect racing and non-racing animals in Queensland, including offences for acts of animal cruelty and breaching a duty of care to an animal. The *Criminal Code Act 1899* also provides for the criminal offence of serious animal cruelty and match-fixing.

Under the *Racing Integrity Act 2016*, QRIC is responsible for overseeing the integrity of race meetings and is therefore responsible for enforcing elements of both the National and Local Rules of Racing.

### Strategic priorities

QRIC's stated vision is to achieve an ethical and safe racing industry in Queensland, in collaboration with the racing industry and the community to:<sup>9</sup>

- Safeguard the welfare of animals involved in racing.

---

<sup>7</sup> <https://www.racingqueensland.com.au/>

<sup>8</sup>

<https://www.racingqueensland.com.au/getmedia/a259454a-cd04-44c2-a9cb-e65ca805bc5d/RO-2022-23-Annual-Report.pdf.aspx>

<sup>9</sup>

[https://qric.qld.gov.au/wp-content/uploads/2023/10/Accessible-version\\_Annual\\_Report\\_2022-2023\\_FINAL.pdf](https://qric.qld.gov.au/wp-content/uploads/2023/10/Accessible-version_Annual_Report_2022-2023_FINAL.pdf)

- Promote the integrity of racing by ensuring consistent and fair administration of the rules of racing.
- Work collaboratively to engage and educate the industry and stakeholders.
- Maintain public confidence in the integrity of Queensland's racing industry.

### Systemic weaknesses

Conflict of interest remains a systemic weakness within the Queensland greyhound racing industry. CPG is concerned that a major conflict of interest is created by the first of the main purposes of the Racing Integrity Act 2016 specified in section 3:

*(1) The main purposes of this Act are:*

*(a) to maintain public confidence in the racing of animals in Queensland for which betting is lawful; and*

*(b) to ensure the integrity of all persons involved with racing or betting under this Act or the Racing Act; and*

*(c) to safeguard the welfare of all animals involved in racing under this Act or the Racing Act.*

CPG argues that requiring a regulator to maintain public confidence in the racing of animals creates a significant conflict of interest. For example, any instances of serious animal welfare breaches are certain to damage public confidence in greyhound racing. Requiring QRIC to balance these incompatible responsibilities creates an irreconcilable conflict in decision making and providing information to the public, as this report will show in later sections.

#### **Recommendation 1**

That the Queensland Government amend the *Racing Integrity Act 2016* by removing paragraph 3(1)(a) from the Act.



## Analysis of stewards' reports and rule breaches

---

### Doping: greyhound racing is NOT a level playing field

Between January 2021 and December 2022, 110 cases were published on QRIC's website in the steward Report Archive,<sup>10</sup> 78 of which were doping cases.

#### How effective are QRIC's doping controls?

The MacSporran report<sup>11</sup> highlighted that *'the issue of animals testing positive for prohibited substances appears to occur largely unabated'*. It is therefore instructive to assess the extent to which doping has been addressed by QRIC.

In September 2022, QRIC released its *Substance Control Strategy*,<sup>12</sup> which is stated to focus on intelligence-driven sampling and collecting samples out of competition as well as in competition. On 14 March 2023, QRIC published a media release praising the effectiveness of this approach.<sup>13</sup> No data to support the effectiveness of the strategy was provided in the media release or on the QRIC internet site.

All doping cases published by QRIC between January 2021 and December 2023 involved samples taken at race meetings. CPG acknowledges that samples taken out of competition (ie samples taken away from the race track, for example during an unannounced kennel inspection) may not be relevant to stewards reports, which specifically relate to race day activities. However, the absence of any published information about the number of samples taken out of competition makes it impossible to assess the effectiveness and deterrent-effect of this strategy.

In its 2022-23 Annual Report, QRIC reports that **22,882 doping control samples** were collected across **all three racing codes**.<sup>14</sup> There were a total of 7,422 greyhound races involving 55,877 starters, 3,740 thoroughbred races involving 43,208 starters, and 2,790 harness races involving 43,208 starters.<sup>15</sup> Data for each racing code are not provided separately.

---

<sup>10</sup> <https://qric.qld.gov.au/stewards-reports/>

<sup>11</sup> <https://qric.qld.gov.au/wp-content/uploads/2023/08/final-report-1-june-2015.pdf>

<sup>12</sup> <https://qric.qld.gov.au/veterinary-services-animal-welfare/greyhound/prohibited-substances/>

<sup>13</sup> <https://qric.qld.gov.au/news/commissions-substance-control-strategy-gets-results/>

<sup>14</sup>

[https://qric.qld.gov.au/wp-content/uploads/2023/10/Accessible-version Annual Report 2022-2023 FINAL.pdf](https://qric.qld.gov.au/wp-content/uploads/2023/10/Accessible-version%20Annual%20Report%202022-2023%20FINAL.pdf)

<sup>15</sup>

<https://www.racingqueensland.com.au/getmedia/a259454a-cd04-44c2-a9cb-e65ca805bc5d/RQ-2022-23-Annual-Report.pdf.aspx>

**The number of doping control samples collected may look impressive, however, when compared with the total number of races across all three codes – 13,952 – and the total number of starters – 106,507 – it looks much less so. In fact, these data raise serious doubts about the rigour of the QRIC Substance Control Strategy.**

### Recommendation 2

That QRIC publish full details of the number and type of substance control samples taken for each racing code, including specifying which were taken on race days and those taken out of competition.

In the absence of published data about samples collected out of competition, CPG's assessment is limited to information published in the QRIC stewards reports.<sup>16</sup> All stewards reports published between January 2021 and December 2023 involved samples in relation to dogs presented at a race, ie samples collected on race days. The majority of samples were collected from dogs that placed in a race.

The fact that samples are generally taken only from dogs that have placed, means that those giving their dogs a performance-suppressing drug to throw a race are unlikely to be caught. As a result, the rate at which QRIC detects doping breaches is likely to be a significant underestimate of the real rate. Therefore, based on QRIC data, it is difficult to avoid the conclusion that cheating is rife in Queensland greyhound races and those betting on Queensland greyhound racing are being ripped off.

### Recommendation 3

That QRIC develop and implement an intelligence-driven doping control program that is consistent with the approaches and strategies implemented by Sport Integrity Australia.

## Prohibited substances used to dope greyhounds

The *QRIC Greyhound Racing Penalty Guidelines 2023*<sup>17</sup> (*QRIC Penalty Guidelines*) provide the following three categories of prohibited substances:

### Category 1: **Permanently Banned Prohibited Substances**

These include the drugs with serious health effects, such as anabolic steroids, illegal drugs (eg amphetamines), opiates (eg morphine), erythropoietin (EPO), gonadotropin, corticotropin, growth hormones, synthetic performance enhancing drugs (eg ITTP) and drugs that act selectively on androgen receptors (SARMs).

<sup>16</sup> <https://qric.qld.gov.au/stewards-reports/>

<sup>17</sup> [https://qric.qld.gov.au/wp-content/uploads/2023/03/Greyhound\\_Penalty\\_Guidelines.pdf](https://qric.qld.gov.au/wp-content/uploads/2023/03/Greyhound_Penalty_Guidelines.pdf)

### **Category 2: Prohibited Substances – Stimulants, Depressants, Antidepressants, Bronchodilators**

These include drugs or chemicals such as caffeine and its metabolites, depressants such as barbiturates, antidepressants such as diazepam and performance enhancing substances such as cobalt and arsenic.

### **Category 3: Prohibited Substances – Painkillers, Anaesthetics and Other Therapeutics**

These include substances such as some muscle relaxants, cough medicines, non-steroidal anti-inflammatories, corticosteroids and some analgesics.

Doping cases involving Category 1 substances are considered the most egregious doping drugs due to their health risks and/or illegal status. Doping cases involving Category 2 and 3 substances are generally considered lower order doping offences as these are common substances or given as veterinary medicines.

However, it must be remembered that Category 2 and 3 substances do affect performance, hence their status as a prohibited substance. Although they could accidentally be given to dogs (eg a veterinary medicine given too close to a race so the body has not cleared it), they could equally well be part of a deliberate doping strategy to give the dog an unfair advantage in the race. Given how much money Queenslanders bet on greyhound racing, any kind of doping has to be a serious concern.

## **How does QRIC apply its Greyhound Racing Penalty Guidelines?**

CPG now turns to the penalties applied by QRIC in cases where the presence of a prohibited substance was detected in a greyhound. To assess the deterrent effect of any sanctions given to those who have been caught doping their dogs, CPG has analysed the 78 doping-related stewards' decisions published in 2021 and 2022.

When QRIC stewards issue bans and/or fines, they often suspend these for a period, usually 12 or 24 months. For example, a trainer might receive a ban from racing for six months, but four months of this is suspended for 12 months. This means that the actual ban period served is two months. CPG has therefore subtracted any suspended sentences to calculate whether the minimum penalty specified in the Penalty Guideline has been issued. In this example, CPG would have taken the penalty given to be two months, not six months.

Where a case involves multiple charges, QRIC almost always issues concurrent penalties. For example, a trainer may have been charged with one count of GAR141 (Charge 1) and one count of GAR142 (Charge 2). If QRIC issued a two month ban for Charge 1 and a two month ban for Charge 2, the person would almost always serve the bans concurrently. This means the two month ban for Charge 2 would be served concurrently with the two month ban for Charge 1. The effect of this is that the trainer or owner would not serve an actual ban period for Charge 2. In this example, CPG would have taken the penalty for Charge 1 to be a two month ban and the penalty for Charge 2 to be no ban.

## Assessment of greyhound doping cases

Between January 2021 and December 2023, QRIC published the outcomes of 78 doping cases.<sup>18</sup> In two of these cases the confirmatory tests failed to detect the prohibited substance and no further action was taken, as they probably were false positive results. In a further two cases, the industry participant passed away prior to a stewards decision. CPG therefore excludes these four cases, leaving 74 doping cases, of which nine cases related to Category 1 offences, 29 to Category 2 offences and 36 to Category 3 offences.

**Figure 1 – Classification of doping cases**

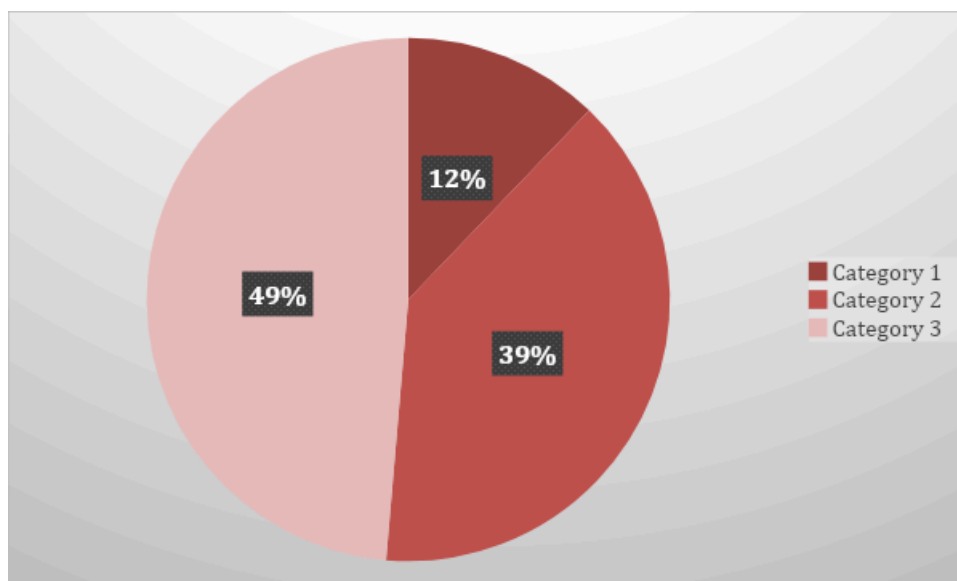
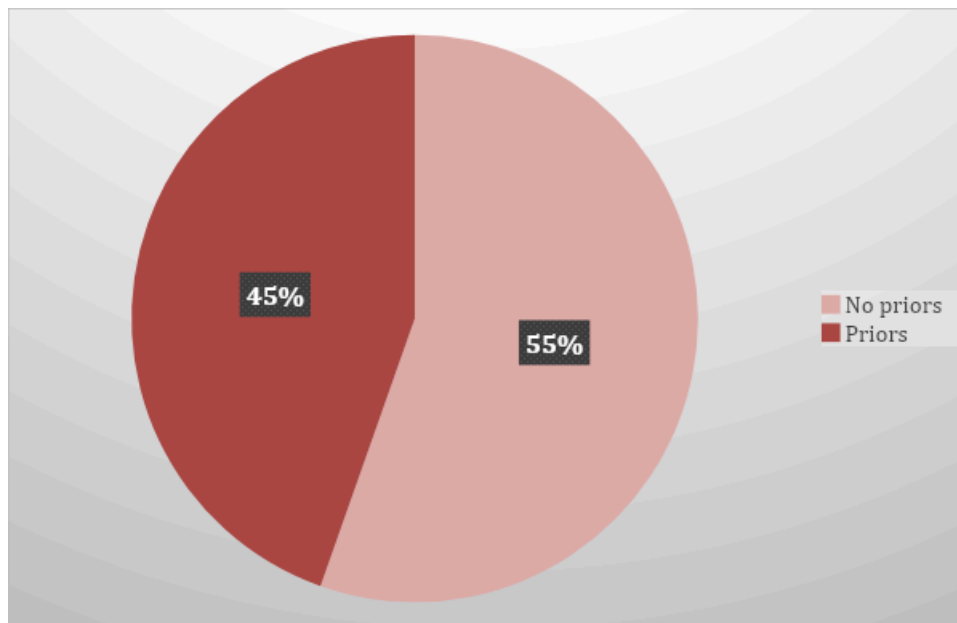


Figure 2 shows that 45% of doping cases (33/74) involved an industry participant who had at least one prior conviction for doping greyhounds, the range being from one to ten prior offences.

<sup>18</sup> <https://qric.qld.gov.au/stewards-reports/>

Figure 2 – Proportion of offenders with prior doping convictions



The QRIC *Penalty Guidelines* were introduced on 30 March 2023.<sup>19</sup> These specify minimum starting points for determining a penalty (disqualification or fine) and increases applicable penalties for a second offence with further increases to penalties for third and subsequent offences. A 25% penalty reduction will be provided for an early guilty plea.

CPG assessed all doping cases that were decided from April to December 2023 against these guidelines, which is a total of 25 decisions. A total of 49 doping cases were assessed for the period January 2021 to March 2023, ie before the issue of the QRIC *Penalty Guidelines*.

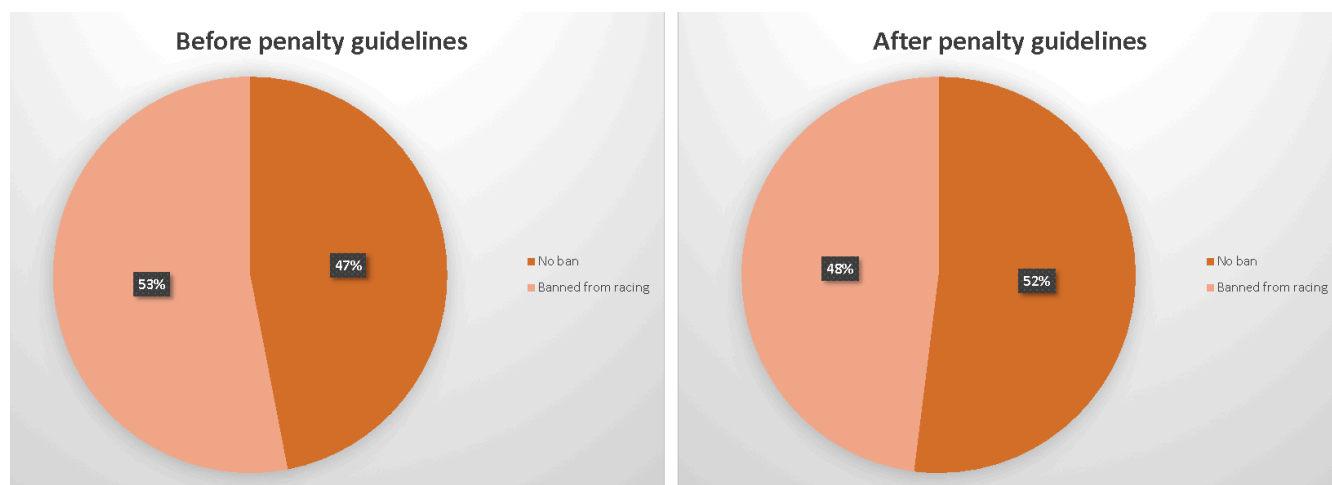
<sup>19</sup> [https://qric.qld.gov.au/wp-content/uploads/2023/03/Greyhound\\_Penalty\\_Guidelines.pdf](https://qric.qld.gov.au/wp-content/uploads/2023/03/Greyhound_Penalty_Guidelines.pdf)

## Comparing decisions on doping cases before and after introduction of the penalty guidelines

CPG’s analysis of the 49 doping cases decided between January 2021 and March 2023 reveals that 47% of offenders (23/49) did not receive a ban from greyhound racing, or their ban was fully suspended; ie they could continue to race their dogs uninterrupted.

Of the 25 doping cases decided by QRIC stewards between March and December 2023, more than half (13/25) did not receive a ban from greyhound racing, or their ban was fully suspended.

**Figure 3 - About half of doping offenders do not receive a ban from racing**



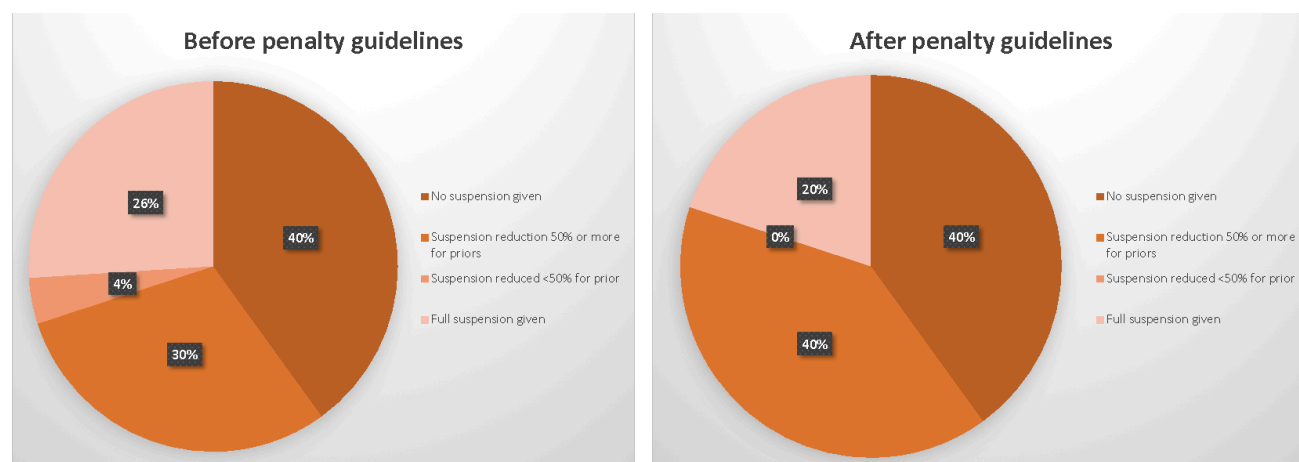
The data reveal a trend toward more decisions that do not involve the offender serving a ban (47% pre-guidelines vs 52% post-guidelines). Therefore, the introduction of the QRIC *Penalty Guidelines* did not make a significant difference to the QRIC stewards’ decisions: about half of those convicted of doping their dogs can continue to race without interruption.

The QRIC *Penalty Guidelines* specify higher penalties and longer periods of suspension for repeat offenders, ie those who are caught doping their dog for the second (or more) time. CPG assessed whether this is reflected in the decisions made involving repeat offenders, some of whom had four or more prior convictions.

Before the QRIC *Penalty Guidelines* were introduced, about 40% (9/23) of repeat offenders were either not banned from racing at all, or the ban was suspended. This means that almost 40% of repeat offenders could continue to race greyhounds uninterrupted. Of the 14 repeat offenders who did receive a ban from racing, 50% (7/14) had their ban period reduced by more than 50%.

After the introduction of the QRIC *Penalty Guidelines*, this pattern continued, with 40% (10/25) of repeat offenders being able to race their greyhounds uninterrupted. Of these, 40% (4/10) were either not banned from racing at all, or the ban was fully suspended. Of the repeat offenders who did receive a ban, 67% (4/6) had their ban reduced by more than 50%.

**Figure 4: Most repeat offenders serve no ban or a greatly reduced ban**



Therefore, based on information published by QRIC, it is apparent that since the introduction of the QRIC *Penalty Guidelines* the tendency to be very lenient to those who dope their dogs continues. Even those who have been caught multiple times generally can continue to race their dogs uninterrupted, or serve a significantly reduced ban period.

### Verdict: doping is entrenched in Queensland greyhound racing

The information published by QRIC demonstrates that the lax attitude toward doping of greyhounds that existed before the introduction of the QRIC *Penalty Guidelines* remains. Clearly, the Queensland Government, via QRIC, has failed to adequately address the concerns raised in the MacSporran report.<sup>20</sup>

CPG is of the view that the minimum penalties specified in the QRIC *Penalty Guidelines* must be mandated by the racing legislative framework. Currently, these are just guidelines, which means the QRIC stewards have no obligation to follow them - and they clearly do not.

The greyhound racing industry exists only for the purpose of wagering. Based on the evidence assessed by CPG, those betting on Queensland greyhound races are not betting on a level playing field. If the Queensland Government is serious about protecting those who bet on Queensland greyhound races from cheating and race fixing (drugs can be used to slow down a favourite), sanctions must be mandated.

#### Recommendation 4

That the Queensland Government amend the racing legislation to mandate penalties specified in the QRIC *Greyhound Racing Penalty Guidelines 2023*. For repeat offenders a penalty higher than the minimum penalty must apply.

<sup>20</sup> <https://qric.qld.gov.au/wp-content/uploads/2023/08/final-report-1-june-2015.pdf>

### Why not take the same approach as human athlete anti-doping programs?

It is difficult to imagine that the penalties issued for doping offences have a significant deterrent effect. In particular, the absence of higher penalties for repeat offenders sends a clear signal that in Queensland, the doping of greyhounds is not considered a serious infraction, and that participants will not usually be stopped from racing greyhounds.

The extent to which QRIC stewards take into account excuses for the presence of a prohibited substance in greyhounds is astonishing.<sup>21</sup> CPG recognises that there are ways that prohibited substances can enter a greyhound without deliberate intent to seek an unfair advantage. However, the fact is that these substances are prohibited because they do provide an unfair advantage. By setting up a regulatory system that fails to take strong action against any detected doping cases, the Queensland Government enables and protects those who dope their greyhounds at the expense of the people who bet on Queensland greyhound races.

This is in stark contrast to human athletes, where a doping offence usually results in immediate suspension and (after completion of an investigation and hearing) bans, which often are career limiting. Article 2 of the WADA World Anti-Doping Code<sup>22</sup> (which is adopted by Australia) specifies very clearly that the presence of a banned substance is a strict liability offence:

*"2.1.1 It is the Athletes' personal duty to ensure that no Prohibited Substance enters their bodies. Athletes are responsible for any Prohibited Substance or its Metabolites or Markers found to be present in their Samples. Accordingly, it is not necessary that intent, Fault, Negligence or knowing Use on the Athlete's part be demonstrated in order to establish an anti-doping rule violation under Article 2.1."*

Currently, when prohibited substances are detected in greyhounds, their trainer can continue to race while the investigation continues. This allows trainers to continue to reap the financial rewards of their doping programs. The following is just one of many examples where a trainer continues to race dogs and win significant prize moneys while the investigation is conducted:

---

<sup>21</sup> <https://qric.qld.gov.au/stewards-reports/>

<sup>22</sup> [https://www.wada-ama.org/sites/default/files/resources/files/2021\\_wada\\_code.pdf](https://www.wada-ama.org/sites/default/files/resources/files/2021_wada_code.pdf)



Case study: Trainer keeps winning prize money while doping case investigated <sup>23</sup>

<b>Number of greyhounds positive for prohibited substance</b>	Three
<b>Drug used</b>	Ostarine <sup>24</sup>
<b>How did the doped dogs perform</b>	All three won their race, respectively, on 31 August 2022, 7 and 14 September 2022
<b>Previous doping offences?</b>	The trainer has one prior conviction
<b>When was the case decided?</b>	16 November 2022
<b>Outcome</b>	12 month ban for each positive greyhound but served concurrently = 36 month ban reduced to 12 months
<b>How many races did the trainer's dogs compete in between 31 August 2022 and 16 November 2022?</b>	36
<b>How many first, second or third places?</b>	Seven firsts, 10 seconds, four thirds
<b>How many first, second or third placings by the three performance-enhanced dogs?</b>	Four firsts, five seconds, three thirds

**Outcome:** The trainer received a 12-month ban for each of the three greyhounds that returned a positive sample. The winnings from only these three races had to be returned, the trainer was allowed to keep the other prize monies. The bans were to be served concurrently, which means the trainer was given a total ban of 36 months, but had to serve only 12 months. The trainer has since returned to racing.

**CPG assessment**

Ostarine is a selective androgen receptor modulator (SARM) with anabolic properties. This means that Ostarine is used to build muscle mass, with the aim of enhancing athletic performance. This also means that once the muscle mass has increased, there will be some measure of enhanced performance over a period of time. In other words, a greyhound that has been performance enhanced using an anabolic substance will carry that advantage for several weeks or months.

<sup>23</sup> <https://qric.qld.gov.au/wp-content/uploads/2022/11/Stewards-Report-TRENT-THORLEY-1.pdf>

<sup>24</sup> Ostarine is an anabolic substances used to build muscle mass (Category 1 substance)

It is therefore concerning that this trainer was allowed to continue racing greyhounds while the investigation continued, including the three greyhounds that tested positive for Ostarine. During this period the trainer's dogs, including those that returned the positive samples, achieved 21 first, second or third placings. CPG recognises that QRIC does not have the powers to provisionally suspend people associated with doping offences while the investigation is conducted.

It can be argued that this omission amounts to state-sanctioned doping in greyhound racing, because those who have doped their dogs can continue to benefit financially from racing their performance enhanced dogs while being investigated for a positive test.

The World Anti-Doping Agency recognised this problem decades ago and has introduced mandatory provisional suspensions to prevent athletes from competing while still reaping the benefits from their doping programs. This has been implemented in Australia by Sports Integrity Australia.<sup>25</sup> CPG is of the strong view that the same approach must be applied to Queensland greyhound racing.

### **Recommendation 5**

That the Queensland Government amend the racing legislation to:

- make the presence of a prohibited substance in a greyhound a strict liability offence, and
- allow for immediate provisional suspension of those presenting a greyhound with a prohibited substance.

---

25

<https://www.sportintegrity.gov.au/what-we-do/anti-doping/anti-doping-rule-violations/provisional-suspensions>

## Animal welfare breaches

### Animal welfare cases January 2021 - December 2023

During this period there were 11 animal cruelty cases, some of which resulted in the most horrific deaths of the greyhounds involved. There were also five cases involving 'disappeared' greyhounds, which can range from failure to report dogs transferred to a third party (usually without evidence of where the dogs have ended up) to failure to notify dogs that have died (usually without veterinary reports documenting the cause of death).

#### Case study: 16 emaciated and two dead dogs due to neglect<sup>26</sup>

##### Summary

QRIC stewards conducted kennel inspections of a property registered to two greyhound owners/trainers on 21 June 2022, 22 June 2022, 7 July 2022, 8 July 2022, 12 July 2022 and 5 August 2022.

21 of the 26 dogs assessed by a vet on 22 June 2022 had body scores of two or less out of five. Veterinary treatment and advice was provided but no dogs seized, not even the four dogs with a body score of 1/5.

On 8 July, the accompanying vet noted that the condition of the dogs had worsened. The eight most critical dogs were seized. On 12 July, a further eight dogs were seized as their condition had worsened.

The stewards' report mentions that two dead dogs were found at the premises but did not specify which inspection.

<b>8</b>	<b>\$0</b>
<b>Number of years banned for the neglect of the dogs</b>	<b>No fine was issued</b>

**Outcome:** While CPG recognises that each of the trainers was disqualified from training and racing greyhounds for eight years, no fine was issued. There is no information about whether the owners were referred for investigation under the Queensland animal welfare laws.

<sup>26</sup>

<https://qric.qld.gov.au/wp-content/uploads/2022/11/Stewards-Report-Laurence-Thomas-2022.pdf>;  
<https://qric.qld.gov.au/wp-content/uploads/2022/11/Stewards-Report-Susan-Thomas-2022.pdf>

### CPG assessment

Any non-greyhound industry participant who neglected 21 dogs, resulting in the death of two of the dogs, would face investigation and prosecution under the Queensland *Animal Care and Protection Act 2001* (ACP Act). Paragraph 17(2) of this act specifies that a person who breaches their duty of care and causes the death of an animal can receive a fine of up to \$309,600 or three years imprisonment.<sup>27</sup>

CPG could not find any evidence that the trainers were investigated and prosecuted under animal welfare laws. Although each of them was banned from participating in greyhound racing for eight years, they were protected from the serious financial or custodial consequences that other Queenslanders would face.

The stewards' report does not specify on which inspection the two dead dogs were found. If they were found at the initial inspection, why were the dogs in poor condition not seized at that time? If they died after the first inspection, it could be argued that QRIC's failure to seize them at the first inspection resulted in unnecessary suffering and ultimate death of these two dogs.

CPG is extremely disappointed at QRIC's decision making in this case and is of the view that this matter is so serious that the Queensland Government must seek a review to ascertain QRIC's contribution to the unnecessary suffering these dogs experienced.<sup>28</sup>

### Recommendation 6

That the Queensland Government undertake a full review of this case to identify amendments to QRIC processes and/or the legislation or local rules of racing, to ensure that abused or neglected greyhounds identified by QRIC stewards receive immediate protection from further harm.

---

<sup>27</sup> The penalty specified in the ACP Act is 2,000 penalty units. The penalty unit value at the time of writing this report was \$154.80.

<sup>28</sup>

<https://www.qld.gov.au/about/how-government-works/government-structure/public-sector-commission/what-we-do/queensland-public-sector-reviews>

**Case study: Death of four dogs due to failure to provide veterinary attention<sup>29</sup>**

**Summary**

A trainer did not provide four greyhounds suffering from canine coronavirus with veterinary attention. As a result of this breach of duty of care, three dogs died before they reached a veterinary clinic, and the fourth had to be euthanised. The report provided by the veterinarian was clear that had the dogs been provided with veterinary care their deaths could have been avoided.

<b>3</b>	<b>\$0</b>
<b>Number of years banned for the neglect of the dogs</b>	<b>No fine was issued</b>

**Outcome:** While CPG recognises that the trainer was disqualified from training and racing greyhounds for three years, no fine was issued. No information was provided to clarify if the owner was referred for investigation under the Queensland animal welfare laws.

**CPG assessment**

Similar to the above case, a person who killed four non-racing dogs by depriving them of the veterinary care they need, could face investigation and prosecution under the ACP Act.

CPG could find no evidence that this trainer faced the much more serious consequences specified in the ACP Act. Available information therefore suggests that those involved in Queensland greyhound racing are protected from facing the much more serious consequences for neglect and cruelty that other Queenslanders would face under the ACP Act.

<sup>29</sup> <https://qric.qld.gov.au/wp-content/uploads/2021/02/Stewards-Report-Noel-Patterson.pdf>

**Case study: Death and injuries resulting from dog fight<sup>30</sup>**

**Summary**

A trainer’s negligence resulted in nine greyhounds fighting. As a result, one dog had to be euthanised and multiple dogs received injuries. The report does not specify how many dogs were injured or the severity of the injuries.

<b>0</b>	<b>\$0</b>
<b>No ban served. A six week ban was issued but it was fully suspended</b>	<b>No fine was issued</b>

**Outcome:** The trainer received a six week ban, but this was fully suspended for 12 months; ie they could continue in the greyhound racing industry without interruption. A restriction was placed on the trainer to limit their number of dogs to a maximum of six.

**CPG assessment**

This trainer was charged by QRIC under Greyhounds Australasia Rule (GAR) 156(f)(ii), which is a general misconduct offence and provides that:<sup>31</sup>

*An offence is committed if a person (including an official):*

*(f) has, in relation to a greyhound or greyhound racing, done something, or omitted to do something, which, in the opinion of a Controlling Body or the Stewards:*

*(ii) constitutes misconduct or is negligent or improper*

CPG’s view is that this matter relates to animal welfare, especially given that one greyhound had to be euthanised due to the injuries suffered. A more appropriate charge would have been under GAR 21(2), which provides:

*A person must exercise the care and supervision necessary to prevent a greyhound under the person's care or custody from being subjected to unnecessary pain or suffering, or from anything which is likely to lead to unnecessary pain or suffering*

<sup>30</sup>

<https://qric.qld.gov.au/wp-content/uploads/2023/09/Stewards-Report-Marie-Westwood-2023-1.pdf>

<sup>31</sup>

<https://galtd.org.au/wp-content/uploads/2023/04/Greyhounds-Australasia-Rules-Effective-30-April-2023-1.pdf>

CPG notes that GAR21 is included in the QRIC *Penalty Guidelines* and attracts a minimum disqualification period of three years for a first offence. The stewards' report does not offer an explanation why the much more lenient approach was taken.

CPG is concerned that the welfare outcomes for the "multiple injured" greyhounds involved in this case were not deemed important enough by QRIC to warrant a mention in the stewards' report. CPG is of the view that the public is entitled to know how many dogs were injured in the fight and the amount of unnecessary pain and suffering that the injured dogs experienced.

There were no real consequences for the trainer as a result of this incident. Provided they did not reoffend in the following 12 months, they escaped any penalty for allowing nine greyhounds to engage in a fight. This is in stark contrast to the strong penalties in the ACP Act for breaches of duty of care that result in death of an animal. Clearly the Queensland Government does not value the welfare of greyhounds as much as it does the welfare of other animals covered by the ACP Act.

### Case study: Dogs kept in woeful conditions<sup>32</sup>

#### Summary

An inspection of a property found:

- four greyhounds kept in a trailer, each housed in bays measuring 108cm (L) x 75cm (W) x 70cm (H)
- seven puppies without access to water
- three greyhounds with insufficient water that was green
- build up of faeces and urine in the kennels
- an unspecified number of dogs with inadequate bedding and coats for temperatures as low as 4.5°C.

A follow up inspection found some of the issues persisted despite an order to address them.

**15**

**\$0**

**Number of months banned for the neglect of the dogs, reduced from a ban of 39 months**

**No fine was issued**

<sup>32</sup> <https://qric.qld.gov.au/wp-content/uploads/2023/07/Stewards-Report-Jason-Haim-8.pdf>

**Outcome:** The trainer was subject to six charges and received bans totalling 39 months. However, this was reduced to 15 months as some of the bans were to be served concurrently.

### CPG assessment

This trainer was charged by QRIC under GAR 21, which, under the QRIC *Penalty Guidelines* attracts a minimum three year ban. However, this was the trainer's fifth offence within the past three years, which, according to the guidelines, should attract a life ban. The ban issued to this trainer is therefore totally inadequate and inconsistent with the guidelines.

Although CPG acknowledges the publication by QRIC of the stewards' decisions, often there is insufficient information to get a full understanding of the case. In addition to the above examples, where it is not clear if the offenders were referred for investigation under Queensland animal welfare laws, there are many reports where it is not possible to ascertain the welfare outcome for the greyhound(s) involved.

The above cases, and others published in QRIC stewards' reports<sup>33</sup> highlight a number of CPG concerns:

- No information is provided about whether QRIC refers animal cruelty/neglect cases for investigation under the ACP Act.
- Penalties issued by QRIC for some animal welfare cases are inadequate and fall significantly short of those specified in Queensland's animal welfare laws.
- Greyhound racing industry participants are protected from the serious consequences that other Queenslanders would face under the State animal welfare laws

### Recommendation 7

That Local Rules be amended to require any person registered with QRIC who, by omission or direct action causes the death of a greyhound, or causes a greyhound to be in such condition that euthanasia is the only option, to be:

- referred to the relevant body for investigation and possible prosecution under the ACP Act,
- immediately suspended from any further participation in greyhound racing while the investigation and prosecution is in progress, and
- banned for life from any involvement in greyhound racing if convicted under the ACP Act.

<sup>33</sup> <https://qric.qld.gov.au/stewards-reports/>



### The “disappeared” dogs

During the period assessed by CPG, there were five QRIC steward’s decisions relating to greyhounds that may have been “disappeared”.

It is well-documented that the greyhound racing industry breeds many times more greyhounds than they can rehome. This places tremendous pressure on rehoming groups, who are struggling with much higher supply than demand.<sup>34</sup> The experience of rehoming groups is that generally, greyhounds they receive show evidence of having been neglected.<sup>35</sup> The difficulty in finding ways to legally offload greyhounds increases the risk of greyhounds being ‘disappeared’ as they were prior to the introduction of regulation, see the McHugh report.<sup>36</sup>

CPG considers any retired greyhounds, or greyhound litters, whose whereabouts cannot be ascertained or whose bodies have been buried without veterinary certificate,<sup>37</sup> to have been ‘disappeared’.

The racing rules and local rules are clear about record keeping and notification of greyhound rehoming or death. Given the length of time these requirements have been in place, it is inconceivable that any industry participant would not be aware of them. It is therefore reasonable to conclude that any failures to notify QRIC of rehomed or dead greyhounds are indicative of the greyhounds having been ‘disappeared’ to avoid ongoing costs for their upkeep. CPG would expect in these circumstances a full investigation to be conducted to ascertain the whereabouts and welfare of greyhounds claimed to have been rehomed, or an autopsy of any greyhound remains.

The stewards’ reports relating to potentially ‘disappeared’ greyhounds include two where litters were transferred to a third party,<sup>38,39</sup> and three where individual greyhounds were transferred and/or could not be identified.<sup>40,41,42</sup> None of these stewards’ reports include confirmation that the location and welfare status of the greyhounds was verified by the stewards. It is impossible for CPG to conclude without doubt that these greyhounds are safe and being well cared for and have not met an unfortunate fate. Given the pressures on the industry posed by large numbers of retired greyhounds, QRIC must take action to address the significant welfare risks posed by the rehoming crisis.

---

<sup>34</sup> <https://greyhoundcoalition.com/exposing-the-issues/gaping-hole-in-rehoming-2021-update/>

<sup>35</sup> <https://greyhoundcoalition.com/exposing-the-issues/gaping-hole-in-rehoming-2021-update/>

<sup>36</sup> <https://apo.org.au/node/65365>

<sup>37</sup> the racing rules prohibit disposal of greyhound bodies by any means other than through a veterinary clinic or approved cremation service

<sup>38</sup> <https://qric.qld.gov.au/wp-content/uploads/2022/11/Stewards-Report-Andrew-Wooler-2022.pdf>

<sup>39</sup> <https://qric.qld.gov.au/wp-content/uploads/2022/10/Stewards-Report-Tom-Tzouvelis-2.pdf>

<sup>40</sup> <https://qric.qld.gov.au/wp-content/uploads/2022/06/Stewards-Report-Tony-Parry-1.pdf>

<sup>41</sup> <https://qric.qld.gov.au/wp-content/uploads/2023/07/Stewards-Report-Jay-Schafer-2023.pdf>

<sup>42</sup> <https://qric.qld.gov.au/wp-content/uploads/2023/06/D-Sutton-Stewards-Report-01a.pdf>

### Recommendation 8

That QRIC implement:

- a genuine whole-of-life tracking system that records the whereabouts of every greyhound from the day it is born to the day that it passes on,
- a kennel inspection program that includes intelligence driven inspections, including more frequent unannounced inspections of industry participants who have breached any racing rule,
- mandatory necropsies of greyhound carcasses found on premises, and
- thorough investigations to ascertain the location and well-being of greyhounds claimed to be transferred to third parties without any supporting evidence.

## Queensland: the killing state

Unlike other states, Queensland has no greyhound welfare Code of Practice and very few rules or regulations around the breeding, rehoming or euthanasia of greyhounds. This means that many of the dogs are inadequately housed and socialised and there is little or no preparation for retirement and rehoming.

As at July 2024, industry participants are permitted to euthanise unwanted greyhounds as *“not suitable to rehome”* without needing to meet any regulatory provisions set down by Racing Queensland or QRIC.

Participants can also “surrender” greyhounds to agencies other than *“dedicated adoption or rehoming agencies”*. This includes universities and veterinary practices. QRIC states in its quarterly greyhound breeding, race injury and retirement reports<sup>43</sup> that *“Euthanasia and adoption data from these agencies are not currently available”*.

In early 2024, RQ and QRIC recognised that unnecessary euthanasia of greyhounds had reached unacceptable levels. Revised rules<sup>44</sup> were produced that RQ and QRIC said were designed to ensure that *“suitable healthy greyhounds leaving the industry should have the opportunity to live out their natural lives as companion animals.”*

However, unlike other jurisdictions like NSW and Victoria, the revised rules do not specifically prohibit the sending of unwanted greyhounds to facilities that conduct blood donation, medical research, training or teaching. They also still permit industry participants to arrange for healthy greyhounds to be euthanised by veterinarians. The wording of the revised rule specifying the circumstances under which a veterinarian can euthanise a greyhound is far too lax.

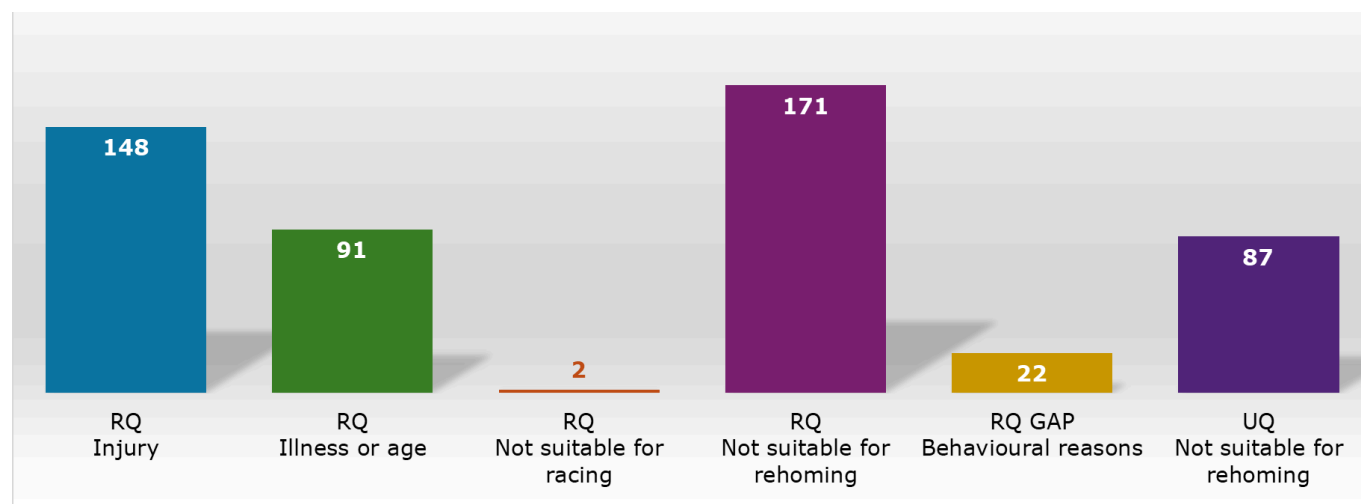
---

<sup>43</sup><https://qric.qld.gov.au/veterinary-services-animal-welfare/greyhound/greyhound-breeding-race-injury-and-retirement-quarterly-reports/>

<sup>44</sup><https://www.racingqueensland.com.au/getmedia/5c7ca1fa-0d1a-4630-beca-ca3d3ff30a7c/20240625-RQ-STAKEHOLDER-NOTICE-Proposed-Greyhound-Local-Rules-11A-11B-11C.pdf.aspx>

As a result of inadequate regulation, Racing Queensland has very high euthanasia rates across all categories as shown in the chart below. The chart also includes Queensland ex-racing greyhounds that are euthanised by the University of Queensland (UQ), most within weeks of their arrival. All these greyhounds were accompanied by QRIC paperwork.

**Figure 5: Euthanasia of retired Queensland racing greyhounds by agency, 2023\***



\*Based on QRIC quarterly reports<sup>45</sup> and greyhound euthanasia data supplied by UQ

A key problem not addressed by the amendments is that there are no enforceable requirements for owners and trainers of racing greyhounds to socialise their greyhounds.

To put this in context, greyhounds are housed in separate kennels and spend very little or no time interacting with people (other than the trainers/owners, which interactions are entirely transactional) or other dogs. The lack of socialisation results in dogs that have no idea how to interact with other people and dogs once they leave the industry.

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.

CPG is concerned that the revised rules maintain existing loopholes via which hundreds of unwanted Queensland greyhounds are killed every year.

<sup>45</sup><https://qric.qld.gov.au/veterinary-services-animal-welfare/greyhound/greyhound-breeding-race-injury-and-retirement-quarterly-reports/>

### Recommendation 9

That revised rule LR11A be amended to include the following:

*“retired greyhounds must not be surrendered to a Queensland or interstate facility that conducts animal research, teaching or training, animal plasma or blood collection. This includes those facilities that also offer a rehoming program”.*

### Recommendation 10

That revised rule LR11B(2)(a) be amended by replacing the words *“(a) a veterinarian has recommended euthanasia on humane grounds, or determined that the greyhound is unsuitable for rehoming on medical or behavioural grounds, meaning: (i) the greyhound has an intractable condition or serious injury, 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 in the circumstances; or (ii) the greyhound has been temperament assessed by the veterinarian and found to display behaviour consistent with an unacceptable risk of aggression towards people or other animals;”* 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.

### Transparency

QRIC is a government agency and is therefore required to be transparent about revenue and expenditures, through regular reporting. QRIC Annual Reports<sup>46</sup> are available online, dating back to 2012/2013.

### Annual report

Both RQ and QRIC submit an Annual Report and Financial Statements to Parliament in compliance with the prescribed requirements of the *Financial Accountability Act 2009* <sup>[19]</sup>, the *Financial and Performance Management Standard 2019* <sup>[41]</sup>, and the *Racing Integrity Act 2016* <sup>[6]</sup>.

As mentioned previously, a transparency issue that was identified within the QRIC Annual Reports is that information is not broken down across the three codes of racing: thoroughbred, harness and greyhound. For example, when kennel and stable inspections are mentioned, a single number is provided for all inspections that were conducted for that financial year <sup>[16]</sup>.

There is no indication about how many of these inspections were conducted for kennels or for stables alone. This lack of transparency makes it difficult to determine the welfare performance of each code of racing. This has the potential to unjustly influence public opinion by making situations and regulatory frameworks appear to be better than they actually are. This leads to a conflict of interest between safeguarding animal welfare and influencing public confidence in the industry.

#### **Recommendation 11**

That QRIC publish comprehensive information about its regulatory performance for each racing code.

---

<sup>46</sup> <https://qric.qld.gov.au/about-us/publication-scheme/about-us/annual-report/>

Below is a breakdown of information available through QRIC (including in the Annual Report).

### Breeding and rehoming statistics

Information	Published (Y/N)	Notes
Number of breeding services provided	N	No information to suggest QRIC or RC collects this information. QRIC only records the number of pups born and dogs retired for breeding purposes.
Number of surgical artificial inseminations	N	
Number of dogs bred	Y	This information is provided in both the Greyhound Breeding, Race Injury and Retirement Quarterly Reports
Number of dogs sent to GAP	Y	
Number of dogs rehomed	Y	This information is provided in both the Greyhound Breeding, Race Injury and Retirement Quarterly Reports and the QRIC Annual Report.

### Injuries and deaths statistics

Information	Published (Y/N)	Notes
Number of race injuries	Y	Greyhound Breeding, Race Injury and Retirement Quarterly Reports
Number of injuries at trials	N	Information not provided
Injury data broken down to injury categories	N	Injuries are categorised as per the nationally agreed convention for classifying race injuries
Review of track injuries	N	Track injuries are reviewed by QRIC and the injury review forum
Number of dogs euthanised/died due to illness	Y	Included in the Greyhound Breeding, Race Injury and Retirement Quarterly Reports
Number of dogs euthanised by GAP	Y	
Number of dogs euthanised/died on track	Y	
Euthanasia/death at trials	N	Information not provided
Number of dogs euthanised from injury post race day	N	Included in the Greyhound Breeding, Race Injury and Retirement Quarterly Reports
Number of dogs died of natural causes	N	
Review of greyhound deaths	N	Stated they do, but not reported by case numbers

## Licensing and training

Information	Published (Y/N)	Notes
Pre-licensing animal welfare competency assessment	N	Standard refers to training requirements but no details provided about pre-licensing assessments
Ongoing mandatory welfare training	N	
Strategy for ensuring dogs are provided with socialisation, exercise and enrichment	N	Information not provided

## Tracking and controls

Regulatory information	Published (Y/N)	Comments
Whole of life tracking	N	No WOLT in place
Number of trainers	N	Information not provided
Number of breeders	N	
Number of owners	N	
Doping control sample numbers	N	Only aggregated data for all three racing codes, no code-specific information
Out of competition sample numbers	N	Information not provided
Number of positive samples	N	Only aggregated data for all three racing codes, no code-specific information
Number of inspections	N	
Unannounced inspections	N	Information not provided
Number of Whelping Related Inspections	N	
Number of inspections of socialisation processes	N	

Although QRIC does provide some information about how they fulfil their regulatory responsibilities, the key issue is that much of the data are provided as a total across all three racing codes. This does not provide the Queensland community with the information they need to assess QRIC’s effectiveness as a greyhound racing regulator. CPG is of the view that, as a government regulator, QRIC must be completely transparent and accountable.

### Recommendation 12

That QRIC publish comprehensive information about how they perform as a regulator of the greyhound racing industry and how well they ensure the welfare of greyhounds that race in Queensland. The information gaps identified in this report must be addressed.

### Conclusions

---

Based on the evidence presented by CPG in this report, it must be concluded that the greyhound racing regulatory framework in Queensland is ineffective and compromised by QRIC's conflicting responsibilities. Regulatory models that attempt to combine the promotion of an industry with ensuring that industry complies with its regulatory responsibilities have been abandoned in other environments because of the irreconcilable conflicts of interest.. The current model must be amended so that QRIC has responsibility only for monitoring compliance with racing rules and applying appropriate enforcement actions in response to non-compliance.

In Queensland, insufficient information is provided to the public to allow an assessment about the effectiveness of QRIC's doping controls. This, coupled with the application of penalties that ignore the QRIC *Penalty Guidelines* and have little deterrent effect, particularly in regard to repeat offenders, should raise concerns with anyone betting on Queensland greyhound races who expect it to be a level playing field. The World Anti-Doping Agency (WADA) has developed much more effective doping control strategies and sanctions with significant deterrent effect. The Queensland Government should ensure these approaches are applied to the Queensland greyhound racing industry.

CPG has highlighted some of the horrific cruelty suffered by Queensland greyhounds, and the inadequate consequences that those who commit such cruelty often face. CPG acknowledges that in some cases significant periods of disqualification, or life bans, were given. However, this report highlights that racing industry participants are effectively protected from the consequences that other Queenslanders would face under Queensland animal welfare laws.

It is CPG's view that in the past eight years, the Queensland greyhound racing industry has shown it is incapable of the reforms that were promised to the community. CPG's preferred position is that this industry be phased out. If this is not supported by the Queensland Government, then it must fulfil its contract with the Queensland people and introduce a stringent regulatory framework that operates independently and without any responsibility for the industry's reputation.