



# Current state of greyhound racing regulation: South Australia



## South Australia: Industry self-regulation puts commercial interests above greyhound welfare

**Prepared by the Coalition for the Protection of Greyhounds  
March 2023 - Updated October 2023**

*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 advocate for law reform that:

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

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

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

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

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

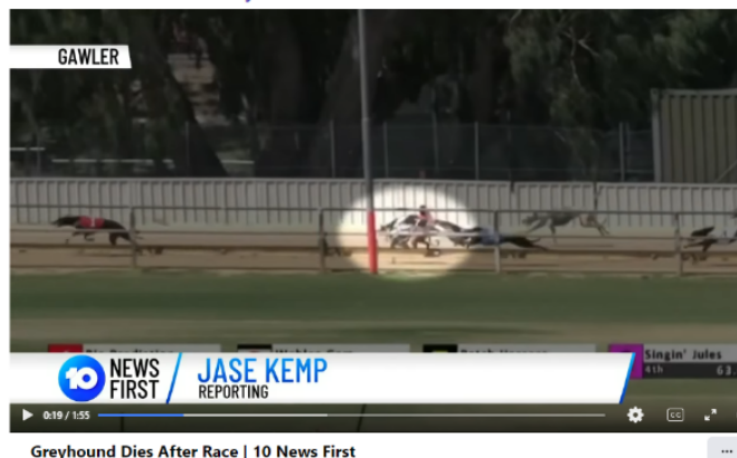
## Industry self regulation prioritises commercial interests

## Introduction

Since 2015, when it was shown that horrific and cruel practices, such as live baiting, were common practice in the greyhound racing industry, states and territories have generally attempted to establish some kind of regulation of the industry.

In the Australian Capital Territory laws were introduced to ban greyhound racing. Some states, such as NSW and Queensland, have established independent regulatory authorities governed by legislation. However, most have a self-regulatory model, such as South Australia, Victoria and Western Australia. Tasmania has a model where a commercial entity oversees the implementation of regulatory requirements as well as protecting and advancing commercial interest. A recent review has identified many conflicts of interest and critical deficiencies with such a model and the Tasmanian Government has committed to reform the system.

10 News First: Midday - 23 Feb 2023 - Network Ten



A greyhound has died racing in 36-degree heat, prompting activists to call for a change in animal welfare laws.

CPG monitors progress of these changes from the animal welfare perspective and publishes track injury and death data, evidence-based white papers, and other papers documenting animal cruelty concerns and deficiencies in the way the industry is regulated.

In the *Current state of greyhound racing regulation* series of papers, CPG will conduct a state-by-state assessment of the respective regulatory frameworks and their effectiveness in prioritising animal welfare and holding those who do not comply with requirements to account for their actions. In this paper, we examine the South Australian approach to regulating the greyhound racing industry.

## Executive summary

The Coalition for the Protection of Greyhounds (CPG) has undertaken an assessment of the effectiveness of Greyhound Racing South Australia as a regulator. In particular, we have focused on GRSA's application of sanctions and penalties in response to breaches of the rules, and on how well GRSA looks after the welfare of greyhounds that race on South Australian race tracks.

CPG found that GRSA routinely prioritises continuity of racing over implementing sanctions that might deter breaches of the rules by other industry participants. As an example, two thirds of people who presented greyhounds with banned substances (ie substances that give the dog an unfair advantage over non-doped dogs) did not have to serve any period of suspension. The only consequence was to return any prize money won. Therefore, the penalties are too soft to be a genuine deterrent.

CPG also found that GRSA's doping control program is antiquated and predictable, which makes it easy to plan doping programs around race days. As a result, it is certain that doping is more prevalent than detected by GRSA. Anyone who bets on South Australian greyhound races should be concerned about how level the playing field really is.

CPG also identified that greyhound welfare plays second fiddle to marketing and commercial considerations. For example, greyhounds trained by the use of animal body parts, and greyhounds suspected of having been trained by live baiting, continue to race.

CPG strongly believes that such dogs must be removed from further racing and given behavioural training to maximise their chance of becoming pets. By allowing them to continue racing, GRSA effectively increases the chances that the greyhounds will be euthanised at the end of their racing days because of behavioural issues.

GRSA publishes little information that might allow the South Australian Government or public to form their own views about how effectively GRSA regulates the industry. This is not surprising as GRSA is a company with a constitution focused on marketing and ensuring the financial viability of the industry.

**two thirds of people who presented greyhounds with banned substances (ie substances that give the dog an unfair advantage over non-doped dogs) did not have to serve any period of suspension**

## Industry self regulation prioritises commercial interests

CPG makes the following 15 recommendations:

### Recommendation 1

That the South Australian Government introduce legislation to ensure effective regulation of the state's greyhound racing industry by establishing a statutory authority that:

- is not funded from industry or wagering revenue and
- has no responsibilities relating to financial interests or viability of the animal racing sector.

### Recommendation 2

That the South Australian Government ensure that animal welfare organisations have membership on bodies involved in regulating dog racing.

### Recommendation 3

That GRSA publish full details about their doping control program, including the number of urine and blood samples taken in-competition and out-of-competition.

### Recommendation 4

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

### Recommendation 5

That those responsible for greyhounds returning a positive doping control sample:

- be held to account via mandatory suspensions that must be served
- must provide evidence for any excuses offered for the doping offence.

### Recommendation 6

The Integrity Hearing Panel (IHP) must seek advice from relevant technical experts, who have no links to the greyhound racing industry, about excuses offered for any doping or other offences/breaches of the rules.

### Recommendation 7

That GRSA refer any suspected offences to the relevant enforcement agency/regulatory authority. This could include, but is not limited to:

- presence in greyhounds of illegal drugs is referred to the South Australian police
- presence in greyhounds of prescription only medicines be referred to the Australian Pesticides and Veterinary Medicines Authority or the Therapeutic Goods Administration
- suspected assaults and/or criminal damage be referred to the South Australian police.

**Industry self regulation prioritises commercial interests****Recommendation 8**

That any breach of rules relating to the presence and/or use of animal bodies, or parts thereof, attract the mandatory minimum suspension period of 10 years with no possibility of serving less than five years of the suspension.

**Recommendation 9**

That all greyhounds that have been trained at a facility, where the use of animal bodies/parts is:

- suspected, be removed from further racing and provided with behavioural re-training to prepare them for life as pets:
- confirmed, undergo behavioural training to maximise their chances of transitioning to life as a pet.

**Recommendation 10**

That GRSA refer all suspected breaches of Part 3 of the *Animal Welfare Act 1985* to an agency responsible for investigating breaches of that Act.

**Recommendation 11**

That all greyhounds that have been trained at a facility, where the live baiting is:

- suspected, be removed from further racing and provided with behavioural re-training to prepare them for life as pets, and
- confirmed, undergo behavioural training to maximise their chances of transitioning to life as a pet.

**Recommendation 12**

That GRSA publish:

- a transparent and accurate injury rate based on the number of greyhounds, not the number of starters
- the number of greyhounds that suffered injuries in more than one race during the reporting period.

**Recommendation 13**

That the South Australian Government suspend greyhound racing until an independent investigation has been conducted to identify reasons for the significant increase in the injury rate between the 2019-20 and 2021-22 financial years, and all recommendations have been implemented to protect the welfare of greyhounds. The full investigation report, including all recommendations, must be made available to the public.

Industry self regulation prioritises commercial interests

**Recommendation 14**

That GRSA implement a regulatory strategy for ensuring that those involved in the industry fulfil their obligations to socialise all greyhounds, to give them the best chance of becoming pets at the end of their racing career. This strategy must include inspections of socialisation programs and an assessment of their effectiveness, as well as collecting feedback from GAP and volunteer based greyhound rescue organisations. This information must be published by GRSA.

**Recommendation 15**

That GRSA 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 South Australia. The information gaps identified in this report must be addressed.



**Greyhound industry under fire**

South Australia's greyhound racing industry is under fire, after two dogs were euthanised in as many days.

Added Sep 21st, 2022



## Overview of the South Australian regulatory framework

---

### The regulator: Greyhound Racing SA Limited (GRSA)

GRSA is a company, governed by a constitution in accordance with relevant corporations legislation. There is no South Australian legislation that specifies the functions of the regulator or requirements for racing industry participants. As such, GRSA and racing industry participants are not accountable to the South Australian Government the way an agency established under the *South Australia Public Sector Act 2009* would be.

The initial members of the company, GRSA, are the South Australian greyhound racing clubs and the Greyhound Owners, Trainers & Breeders Association Coursing Club Incorporated.

This means GRSA is not required to focus on the delivery of services to the South Australian public, nor is GRSA required to be responsive to Government priorities or comply with conflict of interest requirements that apply to South Australian public service agencies and public servants.

The scope of GRSA responsibilities makes it impossible for the company to manage the conflicts arising from its commercial and marketing responsibilities. The objects specified in GRSA's constitution are very clear about the company's focus on the commercial and marketing interests above any animal welfare considerations<sup>1</sup>:

*"The primary object for which the company is established is for the encouragement of animal racing and the secondary objects of the company are:*

*2.1 to replace the body known as the SA Greyhound Racing Authority ("SAGRA") established under the Racing Act 1976 (SA) as the controlling body for greyhound racing;*

*2.2 to acquire all of the assets and assume all of the liabilities of SAGRA and, subject to this Constitution, to take over all of the functions, roles, duties and obligations of SAGRA;*

*2.3 to encourage, promote and conduct the sport of greyhound racing;*

*2.4 to enhance, encourage and promote all other aspects of greyhound racing by providing an efficient and effective gaming environment;*

*2.5 to make greyhound racing more attractive;*

*2.6 to provide industry control and direction for the greyhound industry;*

---

<sup>1</sup><https://grsa.blob.core.windows.net/uploads2/GRSA%20Constitution%20-%20Amended%20as%20at%201.2.2016.pdf>



## Industry self regulation prioritises commercial interests

- 2.7 to effectively market greyhound racing;*  
*2.8 to increase the returns of owners, breeders and trainers from participation in greyhound racing;*  
*2.9 to encourage and enhance the welfare of greyhounds; and*  
*2.10 to encourage and promote the protection and preservation of the history of the greyhound industry; in South Australia."*

CPG is concerned that the South Australian Government has washed its hands of any responsibilities to the greyhounds that race in that state. GRSA's 2022 Strategic Plan further demonstrates the weak commitment to animal welfare: the GRSA Purpose Statement includes three commercial priorities and not a single one that makes a commitment to animal welfare.<sup>2</sup>

**Recommendation 1**

That the South Australian Government introduce legislation to ensure effective regulation of the state's greyhound racing industry by establishing a statutory authority that:

- is not funded from industry or wagering revenue and
- has no responsibilities relating to financial interests or viability of the animal racing sector.

CPG is also concerned that the GRSA constitution specifies that board membership is limited to persons with qualifications and experience in financial management, marketing, legal, business and greyhound racing industry expertise. There is no requirement for the board to include representatives from animal welfare organisations. CPG notes also that, at the time of publication of this report, all board members are male.

**Recommendation 2**

That the South Australian Government ensure that animal welfare organisations have membership on bodies involved in regulating dog racing.

GRSA's constitution raises unacceptable conflicts of interest between its commercial and marketing responsibilities and its greyhound welfare responsibilities. A recent review of the Tasmanian greyhound racing regulatory framework has also identified problems posed by such conflicts of interests and recommended a clear separation between commercial/marketing and regulatory responsibilities. This recommendation has been accepted by the Tasmanian Government.<sup>3</sup>

<sup>2</sup> [https://grsa.blob.core.windows.net/uploads/2022%20Strategic%20Plan\\_Single.pdf](https://grsa.blob.core.windows.net/uploads/2022%20Strategic%20Plan_Single.pdf)

<sup>3</sup> [https://www.premier.tas.gov.au/releases/greyhound\\_review\\_recommendations](https://www.premier.tas.gov.au/releases/greyhound_review_recommendations)

## The South Australian regulatory framework in practice

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

#### GRSA doping controls are inadequate

In the 2021-22 financial year, stewards issued 12 notifications of a positive sample and the IHP made six determinations, five of which related to doping offences.<sup>4</sup>

All doping control samples in these cases were obtained at a race meeting. The 2021-22 annual report<sup>5</sup> states that 1,845 doping control samples were taken. However, the report does not specify how many samples were taken out of competition. This information was previously provided in GRSA annual reports until the 2019-20 report. Data from previous annual reports indicates that 97% of doping control samples collected by GRSA were collected on race days.

**Table 1: GRSA doping control program is too predictable**

Financial year	Samples taken at race meetings	Out of competition samples
2016-17	1,439 (97%)	48 (3%)
2017-18	1,422 (97%)	42 (3%)
2018-19	1,518 (97%)	39 (3%)
2019-20	1,398 (97%)	37 (3%)
2020-21	1,606	Not published
2021-22	1,845	Not published

It is not clear why GRSA ceased publishing the number of out-of-competition doping controls. Relying almost exclusively on in competition testing makes it easy for those wishing to dope their dogs to design a doping program to evade the doping controls.

#### Recommendation 3

That GRSA publish full details about their doping control program, including the number of urine and blood samples taken in-competition and out-of-competition.

<sup>4</sup> <https://greyhoundracingsa.com.au/care-and-integrity/integrity-reports>

<sup>5</sup> <https://grsa.blob.core.windows.net/uploads/2022%20Annual%20Report%20-%20Digital.pdf>

## Industry self regulation prioritises commercial interests

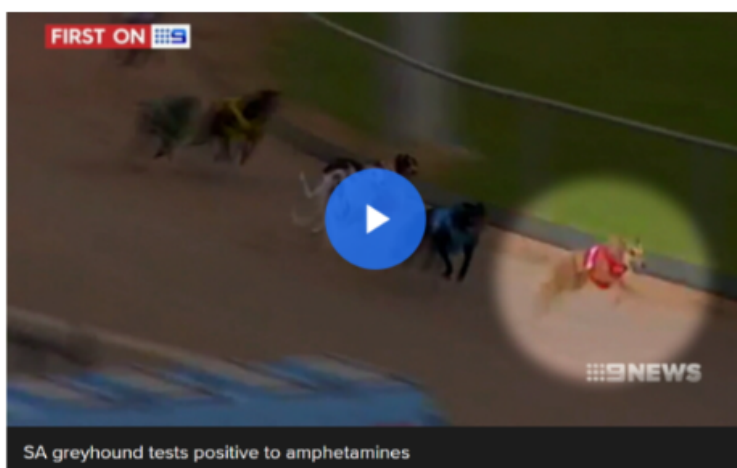
## Why are out-of-competition doping controls important?

Many performance enhancing drugs, such as anabolic steroids that help build muscles and drugs that increase the number of red blood cells, can be given to a greyhound during periods when it is not competing. Administration of the drug can then be stopped in sufficient time before a race so that the drug will be cleared from the dog's system, which means any race day samples will be negative for the drug. Diuretics can help clear the performance enhancing drug/s. The doping can then continue after the race.



News / National

### Greyhound trainer suspended and fined after dog tests positive for amphetamines

 By 9NEWS | 8:21pm Feb 24, 2017


Essentially, relying on in-competition testing, gives greyhound trainers who want to gain an unfair competitive advantage a date around which to arrange their doping programs.

The weakness of this approach was recognised by the World-Anti Doping Agency several decades ago, and human athlete doping control testing now includes about as many, or more, out-of-competition tests as in-competition tests.<sup>6</sup>

Therefore, any doping control program that relies heavily on in-competition testing will be easily circumvented by those who wish to do so. This means the number of

positive tests detected by GRSA will definitely be an underestimate of the actual doping rate. It is therefore inevitable that greyhound racing in South Australia is not a level playing field.

CPG believes that if the greyhound racing industry is serious about providing those who bet on greyhound races with a level playing field, they must adopt the intelligence-driven approaches to controlling doping and competition manipulation implemented by Sport Integrity Australia.

#### Recommendation 4

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

<sup>6</sup> [https://www.wada-ama.org/sites/default/files/2022-01/2020\\_anti-doping\\_testing\\_figures\\_en.pdf](https://www.wada-ama.org/sites/default/files/2022-01/2020_anti-doping_testing_figures_en.pdf)

## Industry self regulation prioritises commercial interests

## GRSA is soft on doping offences

The list of IHP reports published on the GRSA website includes 18 reports related to doping offences since October 2019<sup>7</sup> (current as at January 2023). In 12 of these cases the offenders received a fully suspended disqualification period; in other words, they could continue to race greyhounds without interruption.

CPG notes that two of these reports are only summaries, without details of the race meeting or dogs involved.

It is also apparent that GRSA routinely accepts without challenge, excuses offered as a basis for fully suspending disqualifications. Some of the excuses include:

- In seven cases where the doping involved a human prescription medicine, IHP accepted the excuse that the medicine entered the greyhound's system via "inadvertent transference" from a human to the dog. In none of the cases was evidence provided of how such "inadvertent transference" could occur, nor did the IHP take into consideration any pharmacokinetic data to support their conclusion.
- In six cases where opioid (eg morphine, codeine) or non-steroidal anti-inflammatory medicines (such as meloxicam, carprofen) were detected in the samples, the IHP accepted the excuse that the positive doping result was caused by the dogs receiving these medicines from their food, such as knacker meat or poppy-seed bakery goods. However, IHP required no evidence to show that such food was in fact procured and fed to the greyhound.

A cursory search of the scientific literature reveals a number of studies on the pharmacokinetics of these substances in horses and dogs. Without an assessment of such data, or expert advice, it is not possible to determine if the excuses offered are valid.

- In one case where the banned substance theobromine (also found in chocolate) was detected, the 2.5 month disqualification was fully suspended for two years on the grounds that "*Stewards accept that the likely source of the identified substance was through accidental transference ... through the likely careless disposal (by person(s) unknown) of confectionary wrapping/product.*"<sup>8</sup> The report does not mention what investigations the Stewards conducted to assess the veracity of this claim.

<sup>7</sup> <https://greyhoundracingsa.com.au/integrity/integrity-reports/ihp-hearings>

<sup>8</sup> <https://greyhoundracingsa.com.au/uploads/integrityhearings/Ms.%20K%20Watson%20-%20IHP%20Hearing%20Determination.pdf>

GRSA routinely accepts, without challenge, excuses offered as a basis for fully suspending disqualifications

## Industry self regulation prioritises commercial interests

In these cases, prize money was returned to GRSA and the race results were amended retrospectively. Given that these cases were heard months (in some cases six months) after the race, it is not clear if people who bet on the greyhounds that returned a positive sample had to return their winnings.

However, what is clear is that GRSA is soft on doping: the consequences of presenting a greyhound with a prohibited substance are negligible compared with sanctions given for human athletes (which often result in sanctions of one year or longer). Based on available evidence it is difficult to conclude that the sanctions given to people who presented a greyhound with a prohibited substance have any deterrent effect.

Many of the substances detected in racing greyhounds cause harm or are known to have harmful side effects. CPG is disappointed that the potential for harm to the greyhounds is not considered when doping cases are heard by the IHP.

GRSA applies an antiquated and predictable doping control program that is easy to circumvent and sanctions do not provide a deterrent effect, as most industry participants involved are allowed to continue racing greyhounds without interruption. Any person betting on greyhound racing in South Australia should be asking themselves if they are in fact betting on a level playing field.

### Recommendation 5

That those responsible for greyhounds returning a positive doping control sample:

- be held to account via mandatory suspensions that must be served
- must provide evidence for any excuses offered for the doping offence.

### Recommendation 6

The IHP must seek advice from relevant technical experts, who have no links to the greyhound racing industry, about excuses offered for any doping or other offences/breaches of the rules.

## Other offences/rule breaches

### Assault and criminal damage is not referred to police

In one published case<sup>9</sup>, a greyhound racing industry participant assaulted GRSA officials conducting an inspection, as a result of which the inspector's equipment was damaged. Members of the public who assault another person and damage their property are dealt with by the police and could face prosecution under criminal law.

However, in this case, GRSA dealt with the matter by warning the person off, thus avoiding consequences that other members of the public would face.

#### Recommendation 7

That GRSA refer any suspected offences to the relevant enforcement agency/regulatory authority. This could include, but is not limited to:

- presence in greyhounds of illegal drugs is referred to the South Australian police
- presence in greyhounds of prescription only medicines be referred to the Australian Pesticides and Veterinary Medicines Authority or the Therapeutic Goods Administration
- suspected assaults and/or criminal damage be referred to the South Australian police.

### Using animal parts for training

In 2019, the GRSA found two fox tails at the kennels of two industry participants<sup>10</sup>. The Greyhounds Australasia Rules specify a minimum 10 year disqualification period for possessing any part of an animal on a property where greyhounds are kept, unless special circumstances exist that warrant a reduced penalty. Clearly, this reflects the seriousness with which the use of animal parts for training greyhounds is regarded. Specifically, greyhounds trained using animal parts will be very difficult, if not impossible, to place as pets after they are retired from racing, due to strong prey drive and other behavioural issues resulting from this practice.

<sup>9</sup>

<https://greyhoundracingsa.com.au/Uploads/integrityhearings/30%20Dec%202020%20Mr%20K%20McAuley%20IHP%20Determination.pdf>

<sup>10</sup>

[https://greyhoundracingsa.com.au/Uploads/integrityhearings/8\\_20\\_Schadow%20Determination.pdf](https://greyhoundracingsa.com.au/Uploads/integrityhearings/8_20_Schadow%20Determination.pdf)

## Industry self regulation prioritises commercial interests

The IHP disqualified both participants for a period of 10 years, finding that no special circumstances existed to warrant a reduced penalty<sup>11</sup>. However, the Racing Appeals Tribunal accepted that special circumstances existed and reduced the penalty for both participants to two years, fully suspended. CPG is concerned that such leniency is not an effective deterrent for others to engage in a practice that greatly increases the likelihood of dogs being euthanised post-racing because of behavioural issues. CPG is also concerned that neither GRSA nor the IHP prioritised the behavioural issues that greyhounds trained at that facility may have suffered as a result of being trained using animal parts.

### Recommendation 8

That any breach of rules relating to the presence and/or use of animal bodies, or parts thereof, attract the mandatory minimum suspension period of 10 years with no possibility of serving less than five years of the suspension.

### Recommendation 9

That all greyhounds that have been trained at a facility, where the use of animal bodies/parts is:

- suspected, be removed from further racing and provided with behavioural re-training to prepare them for life as pets:
- confirmed, undergo behavioural training to maximise their chances of transitioning to life as a pet.

## Animal cruelty

A case involving the failure of an industry participant to provide a greyhound with veterinary treatment resulted in it being euthanised<sup>12</sup>. Briefly, a greyhound was presented at a South Australian racing track in a condition that should have



<sup>11</sup>

<https://greyhoundracingsa.com.au/Uploads/integrityhearings/Mrs%20Joan%20Schadow%20-%20Public%20Notice%20of%20IHP%20Result%20-%202020.01.2020.pdf>;

<https://greyhoundracingsa.com.au/Uploads/integrityhearings/Mr%20Ron%20Schadow%20-%20Public%20Notice%20of%20IHP%20Result%20-%202020.01.2020.pdf>

<sup>12</sup>

<https://greyhoundracingsa.com.au/Uploads/integrityhearings/Result%20of%20Inquiry%20Adam%20Burda%202020.09.2020.pdf>



## Industry self regulation prioritises commercial interests

received immediate veterinary attention. The industry participant was ordered to take the greyhound to a veterinary clinic, where an assessment was made that it was in a condition that required euthanasia.

The IHP found the treatment provided was “*clearly less than what was necessary to ensure its health and welfare as evidenced by its presentation upon arrival*” at the race track. However, the CPG is concerned that the IHP had sufficient doubt about the conduct being intentional or reckless to find the industry participant not guilty. The outcome was a \$200 fine for not notifying GRSA of the euthanasia within the required timeframe.

This is another example where the excuses presented were not challenged and there is essentially no consequence for the person involved (other than a small fine). This is not a deterrent to other industry participants, which is concerning, given the general failure by industry participants to build veterinary expenses into their business model. There are many examples (see CPG website and social media posts) of greyhounds who have won tens of thousands of dollars for their owners, but were euthanised when they broke a leg, which is not a fatal injury. In the case of badly broken legs, dogs can adapt quite happily to life with three legs.

Finally, Greyhound Australasia Rule 21 is quite clear about obligations of industry participants to ensure veterinary care is provided when necessary. Any person who has dealt with dogs for any period of time should know the difference between a healthy greyhound and one that is so unwell that it has to be euthanised. This is another demonstration that the South Australian greyhound racing industry protects its members from legal consequences that other South Australians would face if they treated their animals the same way.

the South  
Australian  
greyhound racing  
industry protects its  
members from legal  
consequences that  
other South  
Australians would  
face if they treated  
their animal the  
same way

### Recommendation 10

That GRSA refer all suspected breaches of Part 3 of the *Animal Welfare Act 1985* to an agency responsible for investigating breaches of that Act.

## Industry self regulation prioritises commercial interests

## Live baiting

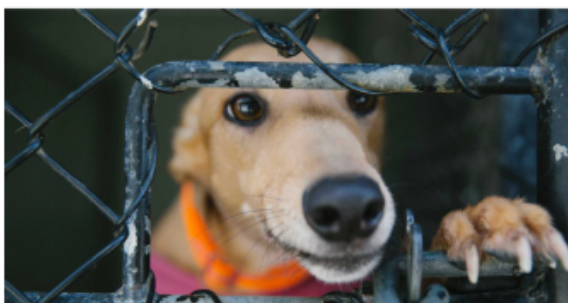
In October 2022, a case of suspected live baiting came to light.<sup>13</sup> Although CPG is pleased that all involved have received a life ban, it is not clear how GRSA will recover the significant fines issued to the three persons involved.<sup>14</sup> The three persons involved have received fines of \$40,000, \$60,000 and \$80,000, respectively.



### Greyhound Racing SA and RSPCA investigate allegation of live baiting against dog trainer

By Chris McLoughlin

Posted Thu 20 Aug 2022 at 1:47pm, updated Fri 20 Aug 2022 at 8:10am



### The Daily Telegraph

Sport > Horse Racing

### South Australian greyhound trainer suspended for alleged live baiting

Greyhound Racing SA (GRSA) has suspended a trainer following allegations of live baiting.

Adam Dobbin

2 min read August 20, 2022 - 12:03PM News Corp Racing and Sports Wagering Hub

0 comments



Racing at Angle Park

GRSA is a company established under the *Corporations Act 2009*. In the absence of legal debt recovery powers, it is not clear how GRSA will enforce the collection of these fines. The only reason an industry participant would pay a fine resulting from a breach of the racing rules would be to ensure continued participation in the industry. Given that all three persons involved in live baiting have been disqualified from the greyhound racing industry for life, there is no incentive to pay the fines.

This reinforces the need for the South Australian Government to establish an independent regulatory authority in law - see Recommendation 1.

CPG is also disappointed that the stand down that had applied to all greyhounds trained on the premises was lifted on 11 October 2022. The IHP hearing report does not provide any information about the fate of the greyhounds trained at the premises where live baiting has occurred.

This shows a lack of concern for the greyhounds, who are certain to have behavioural issues that will interfere with rehoming as a pet at the conclusion of their racing career. CPG is of the strong view that all greyhounds trained at the premises should be provided with behavioural training to maximise their chances of becoming pets. Racing them further

<sup>13</sup> [https://greyhoundracingsa.com.au/uploads/stewardsinquiries/Notice%20of%20Inquiry%20-%20Live%20Baiting%20Allegations\\_20102022.pdf](https://greyhoundracingsa.com.au/uploads/stewardsinquiries/Notice%20of%20Inquiry%20-%20Live%20Baiting%20Allegations_20102022.pdf)

<sup>14</sup> [https://greyhoundracingsa.com.au/uploads/integrityhearings/Stewards\\_Note\\_Live\\_Baiting\\_19June2023.pdf](https://greyhoundracingsa.com.au/uploads/integrityhearings/Stewards_Note_Live_Baiting_19June2023.pdf)

## Industry self regulation prioritises commercial interests

will only reinforce the behaviours that have been developed by training them to kill live animals.

Given that live baiting is used to provide racing dogs with a competitive advantage, it should be a concern to other industry participants, and especially those who bet on South Australian greyhound races, that these dogs could still be racing.

### **Recommendation 11**

That all greyhounds that have been trained at a facility, where the live baiting is:

- suspected, be removed from further racing and provided with behavioural re-training to prepare them for life as pets, and
- confirmed, undergo behavioural training to maximise their chances of transitioning to life as a pet.

## Industry self regulation prioritises commercial interests

## Transparency

### Annual reports

As is to be expected for a company, GRSA annual reports are heavily focused on performance of the industry, betting revenue, industry events, marketing and racing club information. Animal welfare and integrity information forms a very minor part of the annual reports.



Injury rates are presented in a non-transparent manner, namely as a percentage and not total number of injuries.

Further, GRSA publishes only the total number of starters but not the number of individual greyhounds that raced in South Australia. CPG therefore assumes that the injury rate published in GRSA annual reports represents the percentage of total starters that were injured in the reporting period.

The following table presents the injury rate as a percentage of the total number of starters.

**Table 2: The number of dogs injured on South Australian race tracks is increasing**

GRSA Annual report	Number of starters	Published injury rate	Number of injuries
2019-20	28,202	2.57%	725
2020-21	28,246	2.95%	833
2021-22	31,354	2.99%	937

Presenting this information as a percentage rather than total number deflects attention from the significant number of injuries that occur during greyhound races on South Australian racetracks.

'Starter' means a greyhound that is entered into, and starts a race or qualifying trial pursuant to the GRSA Greyhound Rules of Racing. In its reporting, GRSA uses 'starters' instead of individual greyhounds such that one greyhound is counted, for example, 50 times because it had 50 races in one financial year.

## Industry self regulation prioritises commercial interests

Clearly, this will massively reduce the apparent injury rate. GRSA does not publish the number of registered greyhounds, but CPG has obtained this information from South Australian Dog and Cat Management Board (DCMB) annual reports.<sup>15</sup>

Using this information, a much more accurate injury rate can be derived as follows:

**Table 3: The published number of dogs injured on South Australian race tracks is a gross underestimate**

DCMB Annual report	Number of individual greyhounds	Number of injuries	Injury rate
2019-20	1,385	725	52.3%
2020-21*	NA	833	NA
2021-22	1,125	937	83.2%

\* DCMB did not publish an annual report for 2020-21

CPG notes that the injury rate in Table 3 is likely to be an overestimate because some greyhounds will be injured more than once in any single financial year. This is offset by the fact that the above statistics represent only injuries suffered at races or qualifying trials and not injuries suffered at training or public trials, which do not have a veterinarian in attendance. Nevertheless, it is safe to conclude that the injury rate published in the GRSA annual reports is a gross underestimate of the real figure.

### Recommendation 12

That GRSA publish:

- a transparent and accurate injury rate based on the number of greyhounds, not the number of starters
- the number of greyhounds that suffered injuries in more than one race during the reporting period.

CPG is also concerned that, although about 20% fewer greyhounds were registered to race in 2021-22 compared with 2019-2020, the number of injuries increased significantly. This was hidden by the way GRSA calculates their published injury rate. Although it is likely that the actual rate is somewhat lower than 82.3%, the available data indicates that 2021-22 was an *annus horribilis* for greyhounds racing in South Australia.

<sup>15</sup> <https://dogandcatboard.com.au/about/plans-reports>

## Industry self regulation prioritises commercial interests

# the available data indicates that 2021-22 was an annus horribilis for greyhounds racing in South Australia

Given the quantum of the increase in injuries that occurred within such a short period, all greyhound racing must be suspended until the cause has been identified and all corrective and preventive actions implemented and independently verified.

## Recommendation 13

That the South Australian Government suspend greyhound racing until an independent investigation has been conducted to identify reasons for the significant increase in the injury rate between the 2019-20 and 2021-22 financial years, and all recommendations have been implemented to protect the welfare of greyhounds. The full investigation report, including all recommendations, must be made available to the public.

## Greyhound welfare information

A key aspect of being a transparent regulator is providing their government and the public with information that allows them to form their own conclusions about the effectiveness of their regulator. As shown in Table 4, GRSA does not provide sufficient information about how it prioritises the welfare of greyhounds that race in South Australia. This adds to the concerns highlighted in Tables 2 and 3.

## The Advertiser

### Greyhound breeding facility will likely cause dog deaths: RSPCA

THE RSPCA has slammed Murray Bridge council's decision to allow an intensive greyhound breeding complex, warning the facility would likely result in surplus and slow dogs being killed.



Elizabeth Henson

Follow



@Eliz\_henson



2 min read

July 20, 2019 · 5:48PM

The Advertiser

20 comments



Council hounded over dog track

## Industry self regulation prioritises commercial interests

**Table 4: Greyhound welfare information made available by GRSA:**

Welfare information	Published (Y/N)	Comments
Number of breeding services provided	N	No information to suggest GRSA collects this information
Number of surgical artificial inseminations	N	No information to suggest GRSA collects this information
Number of dogs bred	Y	Annual report
Number of dogs sent to GAP	Y	Annual report
Number of dogs rehomed	Y	Annual report
Number of injuries on track	N	GRSA publishes only an injury rate using the number of starters, not the number of individual greyhound racing in a given period
Number of injuries at trials	N	No information to suggest GRSA collects this information
Number of injuries during training	N	No information to suggest GRSA collects this information
Injury data broken down to injury categories	N	It is not clear if GRSA has adopted the nationally agreed convention for classifying race injuries
Review of track injuries	N	No information to suggest reviews are conducted
Number of dogs euthanised/died due to illness	Y	Annual report
Number of dogs euthanised by GAP	Y	Annual report
Number of dogs euthanised/died on track	Y	Annual report
Number of euthanasia/death at trials	N	It is not clear if annual report data includes these deaths, they are not presented as a separate category
Number of dogs died of natural causes	Y	Annual report
Review of greyhound deaths	N	No information to suggest reviews are conducted



## Industry self regulation prioritises commercial interests

Welfare information	Published (Y/N)	Comments
Greyhound welfare committee minutes/advice	N	No information to suggest such a body exists
Pre-licensing animal welfare competency assessment	N	No information to suggest industry participants must demonstrate animal welfare knowledge before being issued a licence
Ongoing mandatory welfare training for industry participants	N	No information to suggest industry participants must maintain animal welfare knowledge
Strategy for ensuring socialisation recommendations in the GRSA Animal Welfare Policy 2021 are adhered to by all industry participants	N	See below

Table 4 highlights the many deficiencies in the GRSA operating model and there are many areas where the information provided is lacking. These should be addressed as a matter of priority.

CPG is especially concerned about the absence of any information that provides the South Australian Government and public with confidence that the industry takes all steps to ensure greyhounds reaching the end of their racing career are behaviourally suited for life as pets.

The GRSA 2021-22 annual report shows that in the past three financial years, 36 greyhounds were euthanised by GAP due to behavioural problems (16 in 2019-20, 16 in 2020-21 and 4 in 2021-22). This indicates that not all industry participants socialise their greyhounds as per the GRSA Animal Welfare Policy. Further, it is not known how many greyhounds that bypassed the GAP program (eg. direct transfer to another person, for example family members or friends not registered as greyhound industry participants) were euthanised for behavioural problems. The published figures therefore are likely to be an underestimate.

#### Recommendation 14

That GRSA implement a regulatory strategy for ensuring that those involved in the industry fulfil their obligation to socialise all greyhounds, to give them the best chance of becoming pets at the end of their racing career. This strategy must include inspections of socialisation programs and an assessment of their effectiveness, as well as collecting feedback from GAP and volunteer based greyhound rescue organisations. This information must be published by GRSA.

## Industry self regulation prioritises commercial interests

## Regulatory information

Given the South Australian Government has chosen to trust its greyhound racing industry to regulate itself, it is reasonable to expect that GRSA provide information to allow the government and the public to determine how effectively it fulfils its regulatory obligations. Table 5 shows that the information provided does not provide any assurance that regulatory obligations are given the same priority as marketing and ensuring the financial viability of the industry.

**Table 5: Information about regulatory actions made available by GRSA**

Regulatory information	Published (Y/N)	Comments
Whole of life tracking	N	This should be a priority for GRSA
Number of trainers	Y	Annual report
Number of breeders	Y	Annual report
Number of owners	Y	Annual report
Doping control sample numbers	Y	Total number only in last 2 annual reports
Out of competition sample numbers	N	-
Number of positive samples	Y	Annual report
Number of inspections	Y	Annual report, no information is published about about inspection outcomes
Number of follow up inspections	N	-
Number of unannounced inspections	N	-
Number of intelligence driven inspections	N	-
Number of new property inspections	N	GRSA has committed to conduct new property inspections <sup>16</sup>
Number of whelping related inspections	N	GRSA has committed to conduct pre- and post-whelping inspections
Inspections of greyhound socialisation processes	N	Must include an assessment of their effectiveness

<sup>16</sup> <https://grsa.blob.core.windows.net/uploads/Animal%20Welfare%20Policy%202021.v.2.pdf>

Industry self regulation prioritises commercial interests

GRSA therefore does not provide the South Australian Government or public with the information they need to assess whether GRSA meets their regulatory obligations in a manner equivalent to long-established best practice in other regulatory environments, including human sports integrity.

**Recommendation 15**

That GRSA 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 South Australia. The information gaps identified in this report must be addressed.

## Industry self regulation prioritises commercial interests



Just In

Top Stories

Cost of Living

Voice Referendum

Australia

World

COVID-19

Politics

Immigration

### Australia

Published 31 August 2015

## Greyhounds need integrity agency: RSPCA SA

The RSPCA in South Australia has called for an independent greyhound racing integrity agency as part of its proposed animal welfare reforms.

The RSPCA is calling for a string of reforms to improve the welfare of greyhounds in the South Australian racing industry and deter breeders from live baiting and doping.

RSPCA South Australia has proposed an independent greyhound racing integrity agency be established and a public database that traces the lives of racing greyhounds be introduced.

## Conclusions

Based on the evidence presented by CPG, it has to be concluded that GRSA is not an effective or independent regulator of the South Australian racing industry.

Those betting on greyhound racing on South Australian race tracks can have no confidence that they are betting on a level playing field. An effective regulator does have to give those it regulates procedural fairness and an opportunity to respond to the allegations against them.

However, an effective regulator also requires any excuses offered to be supported by evidence. An effective regulator seeks expert advice on matters on which it does not have the expertise to assess the validity of the presented evidence. It is common practice for regulatory agencies to establish panels of experts to provide such advice.

In contrast, GRSA (via IHP) accepts any excuse without challenge and without requiring supporting evidence. Further, two thirds of the published IHP decisions relating to doping have resulted in fully suspended sanctions.

## Industry self regulation prioritises commercial interests

Aside from having to reimburse any prize money, there are no consequences for those who present dogs with prohibited substances.

The approach to doping control implemented by GRSA is antiquated and very predictable. GRSA needs to align its doping control program with that applied by human sports integrity regulators, which implemented intelligence-driven programs many years ago. These programs continue to adapt to athlete attempts to gain unfair advantages and publish much information that would assist GRSA to bring their approach into the 21st century. This would also provide more assurance to those who bet on greyhound racing that they are not rewarding those who gain an unfair advantage by doping their dogs.

Finally, GRSA clearly focuses on its marketing and commercial responsibilities to the detriment of greyhound welfare. There is very little information provided about how GRSA ensures the welfare of greyhounds subjected to doping and it appears that its approaches are unsophisticated and focused on ensuring that there are no interruptions to racing.

CPG is especially concerned that greyhounds trained at facilities where animal body parts were found, or where live baiting is suspected, continue to race. Such dogs will have behavioural issues that will complicate their retirement as pets. Allowing such dogs to continue racing reinforces these behaviours and will make it even more likely that they will be euthanised due to behavioural issues. This is another example where GRSA prioritises racing over greyhound welfare.

Aside from  
having to  
reimburse any  
prize money,  
there are no  
consequences  
for those who  
present dogs  
with prohibited  
substances.