



Submission



Objections to DA 2021-129 Animal Boarding & Training Facility

**Prepared by the Coalition for the Protection of Greyhounds
July 2022**

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, including Queensland.

We advocate for law reform that:

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.

Funds rescues and sanctuaries. Greyhound breeding nationally is six times the racing industry's capacity to rehome. To avoid healthy and rehomingable greyhounds being put to death, state governments must fund private greyhound rehoming organisations and privately operated sanctuaries.

Increases penalties. Penalties are not proving a deterrent given the financial rewards offered by the industry. The industry must also strengthen associated regulation and enforcement.

Reduces breeding. According to the latest GRNSW Annual Report, around 25 per cent of greyhounds bred in FY20/21 were surplus to requirements. The greyhound racing industry must stop offering financial incentives for breeding and industry regulators must be empowered to set and enforce breeding numbers

Makes tracks safer. Approximately 850 greyhounds are injured each month and over 200 are killed each year on Australian tracks. To improve track safety, the greyhound racing industry must develop purpose-built straight tracks; reduce the number of starters from eight greyhounds to six, and install an extended lure at all tracks.

Introduction

CPG welcomes the opportunity to make a submission on Muswellbrook Shire Council's DA 2021-129 *Animal Boarding and Training facility*. CPG has a long history of providing policy submissions on matters pertaining to the regulation of the greyhound racing industry in Australia.

The proposal seeks approval for the construction of a facility, in a remote location that becomes inaccessible several times a year, in which up to 400 greyhounds will be housed. The greyhounds will be those difficult to rehome due to behavioural issues. The objective is to rehabilitate these greyhounds so they can be rehomed.

It is CPG's view that this DA is not in the public interest as the proposed development will not meet its stated objective and serious animal welfare concerns remain. CPG is concerned that the proposed development will become a warehousing facility where the industry's problem dogs will be hidden out of sight, instead of a genuine attempt to rehabilitate them to be rehomed.

We make four objections to DA 2021-129 *Animal Boarding and Training facility*:

Objection 1: An opportunity for systemic improvements in greyhound socialisation

- The proposed development is a result of a systemic failure by the greyhound racing industry to effectively socialise its greyhounds.
- GRNSW has missed an opportunity to not only improve the welfare outcomes for the greyhounds to be housed at the proposed facility, but all greyhounds while registered to an industry participant.

Objection 2: DA 2021-129 is not compliant with the GWIC NSW Greyhound Welfare Code of Practice

- Standard 7.3 of the NSW Greyhound Welfare Code of Practice specifies requirements that have not been addressed by GRNSW.
- The greyhounds to be housed at the proposed facility will be in the care of GRNSW, which will be responsible for compliance for all requirements.

Objection 3: Greyhounds with behavioural issues will not be rehabilitated by GRNSW's proposal

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- Correcting animal behaviours is complex and requires individual treatment plans and actions. A ratio of twenty greyhounds per greyhound assistant will not allow the necessary one-to-one rehabilitation and training time that will be required.
- Behavioural rehabilitation and treatment requires specific training and experience. GRNSW has failed to demonstrate how it will ensure the requisite expertise will be available.

Objection 4: Greyhound welfare concerns

- CPG disagrees with the flood risk and impact analyses because they are based on historical data and they ignore future forecasts (published by the NSW Government), which point to more frequent and severe flooding events, as well as more and longer droughts.
- As greyhounds will remain at the facility with a maximum of 6 staff, CPG argues that GRNSW will likely not be able to meet its obligations under the Prevention of Cruelty to Animals Act 1979.
- By choosing not to install simple and cost-effective fire mitigation equipment, GRNSW is placing at risk the welfare of both staff and greyhounds, especially as the trees and shrubs mature.
- The proposed site is habitat for a number of venomous snakes. CPG argues that the site is too far away to bring greyhounds to a veterinary clinic able to treat them.

Objections to DA 2021-129 Animal boarding and training facility

Objection 1: An opportunity for systemic improvements in greyhound socialisation

One of the goals of the Bylong facility is to ensure that greyhounds deemed difficult to rehome due to behavioural issues receive treatment until they are fit for rehoming, or they remain there permanently where these issues can not be treated.

The Greyhound Welfare Integrity Commission (GWIC) notes in its Industry Practice Guide¹ that the benefits of early socialisation is that greyhounds may adapt better to new environments and create more behaviourally stable greyhounds. If greyhounds were appropriately, consistently and meaningfully socialised at a young age then the proposed facility would not be required.

CPG is concerned that the GWIC Greyhound Welfare Code of Practice (Greyhound Welfare Code) requirements relating to greyhound socialisation and behaviour management are not being met. We have provided evidence of physical and psychological neglect in greyhounds surrendered for adoption in our report *A GAPing Hole in the Industry*.²

The Greyhound Welfare Code includes the following requirements³:

7.3 Participants must provide greyhounds in their care with opportunities for expression of normal canine behaviours, to prevent stress and anxiety. If a greyhound shows signs of stress or anxiety which do not resolve quickly, or exhibits stereotypic behaviours, participants must seek veterinary treatment.

7.12 Participants must have a written plan detailing how the Exercise, Socialisation and Enrichment standards in this Code will be met for the greyhounds in their care.

7.13 An Exercise, Socialisation and Enrichment Plan may be temporarily varied or suspended where a greyhound is undergoing veterinary treatment and requires rest or rehabilitation as part of its treatment.

¹ [GWIC Practice Guide 12.1](#)

² [CGP A GAPing hole in the industry](#)

³ 7.12, 7.13 apply to registered participants while the greyhound is racing. 7.3 also applies to retired greyhounds.

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Any greyhound surrendered to the proposed facility therefore must have a written Standard 7.12 plan. The GRNSW DA application does not make reference to how these written plans will be used by GRNSW to assess each greyhound and the specific behavioural treatment they will receive while at the facility.

A key aspect of determining the root cause of a behavioural issue is understanding the greyhound's history⁴. This would be informed by the written plan, which would therefore be key to understanding the treatment a greyhound needs to give them the best chance to rehabilitate and become suitable for rehoming.

Assessing the written plans would also allow GRNSW to further improve guidance and training for industry participants on how to effectively socialise greyhounds in their care. This in turn would reduce the need for the proposed facility over time. CPG's report *A GAPing Hole in the Industry* provides evidence that strongly suggests the plans currently developed by industry participants are not having the desired effect; i.e. too many greyhounds leave the industry with behavioural problems. In fact, this DA is evidence of that fact.

GRNSW has not demonstrated how they will ensure each greyhound that enters the facility has the best possible chance of having their behavioural issues treated so they can be rehomed. It is therefore difficult to assume anything other than this facility will be a warehousing facility where 'problem greyhounds' will be kept out of mind and out of sight until their death.

By requiring GRNSW to demonstrate how they will maximise the use of information that already exists within the industry to not only treat the greyhounds at the proposed facility, but also improve greyhound welfare standards (relating to socialisation), Muswellbrook Shire Council has an opportunity to positively influence welfare outcomes for greyhounds.

⁴ [GRV Fact Sheet - Abnormal behaviours in greyhounds](#)

Objection 2: DA 2021-129 is not compliant with the GWIC NSW Greyhound Welfare Code of Practice

The Greyhound Welfare Code specifies the following requirement:

7.3 Participants must provide greyhounds in their care with opportunities for expression of normal canine behaviours, to prevent stress and anxiety. If a greyhound shows signs of stress or anxiety which do not resolve quickly, or exhibits stereotypic behaviours, participants must seek veterinary treatment.

This requirement applies to retired greyhounds so it does apply to greyhounds kept at the proposed facility.

The GRNSW DA explicitly states (Appendix F - Greyhound Turnover Information) that they expect greyhounds to be in the facility for up to 6 months, and up to 10 dogs annually to become permanent residents of the facility.

The DA does not include any information about how Standard 7.3 of the Greyhound Welfare Code will be met in relation to dogs kept at the facility that display these symptoms. Appendix 7 - Operational Plan indicates that a veterinary nurse will be on site, however, this is not sufficient to meet Standard 7.3. A veterinary nurse can provide veterinary care but veterinary treatment must be provided by a veterinarian.

In the absence of any information about how veterinary treatment (i.e. treatment by a veterinarian) under the specified circumstances will be provided it is not clear how GRNSW will meet this requirement specified in the NSW greyhound racing legislative framework. It would be inappropriate for a DA that does not clearly demonstrate compliance with all requirements to be approved.

Objection 3: Greyhounds with behavioural issues will not be rehabilitated by GRNSW's proposal

The GRNSW Bylong Park Farmstay Operational Plan provided in Appendix 7 demonstrates the inadequacy of the proposed development for its intended purpose; i.e. to treat behavioural issues so that greyhounds can become suitable for rehoming.

3.1 Correcting animal behaviours is complex and requires individual treatment plans and actions

GRNSW proposes to provide the greyhounds with behavioural treatment and training via greyhound assistants at the ratio of 1:20. No formal qualifications or experience have been proposed for these staff. This means that individualised treatments will be impossible. Further, GRNSW has provided no evidence that a professional dog behaviourist will be involved in the development of the greyhounds' behavioural treatment plans.

Instead, the draft GROWS daily operations plan (Appendix 7) proposes that a total of just under 4 hours of each day will be spent with greyhounds on behavioural rehabilitation and training. At one greyhound assistant per 20 greyhounds, this equates to just under 12 minutes of one to one time for each greyhound. It is important to note that effective treatment of behavioural issues will require plenty of one to one time.

In fact, placing multiple greyhounds with behavioural issues together is a serious welfare risk as there will be aggressive and other behaviours that will cause injuries and exacerbate any behavioural problems (see also Objection 4).

The DA information leads to the conclusion that GRNSW will not provide the greyhounds with the individual behavioural rehabilitation and training they need. As a result the proposed facility will not achieve the stated objective, i.e. to transition greyhounds with behavioural issues to become suitable for rehoming. The DA therefore should not be approved as it essentially will be nothing more than a greyhound 'warehousing facility'.

3.2 Behavioural rehabilitation and treatment requires specific training and experience

According to Dogs Australia⁵ and National Dog Trainer Federation⁶, behavioural assessments and training should be conducted by people with appropriate qualifications and experience, such as a Certificate III in Dog Behaviour and Training or Certificate IV in Animal Behaviour and Training, or preferably a veterinary behaviourist for complex cases.

Given the ratio of greyhounds : greyhound assistants will be 20:1 it is even more important to ensure that all staff have adequate experience and training. GRNWS did not provide a job description, including essential experience and training, for the greyhound assistants.

The operational plan provided in Appendix 7 of the DA indicates that greyhound assistants will also be responsible for cleaning the kennels. It is therefore not likely that many accredited dog trainers would apply for such positions, especially as not all will be full time.

As experience and qualifications are key to the greyhounds assistant's role, GRNSW must provide information about how it intends to ensure all these staff have experience and training to achieve the stated objective of the facility.

Given GRNSW does not intend to staff the facility with suitably qualified and experienced staff, the stated objective of the facility will not be met. Therefore the DA should be rejected.

⁵ [Dogs Australia Expert Advice - How to be a Dog Trainer](#)

⁶ [National Dog Trainers Federation](#)

Objection 4: Greyhound welfare concerns

4.1: Greyhound welfare during emergencies

With recent flooding in the Bylong Park area, some provisions in the flood risk assessment plan need to be considered and questioned. Concerns arise as to how non-essential staff will be able to maintain animal welfare and ensure that each and every greyhound is safe and well. With a maximum of only 6 essential staff during periods when the site is not accessible, it is not reasonable to expect that 400 greyhounds can receive the care and treatment they need during a crisis.

Would there be special considerations for greyhounds with significant behavioural issues, or those that require extra care, e.g. those recovering from injury or illness?

This is of particular concern because of the fact that the property will be inaccessible during periods where Martindale Creek is flooded. These periods can be up to or more than 7 - 10 days.

CPG notes that the models presented in Appendices 21 a and b of DA 2021-129 are an estimate based on data from the MacDonald River. The current flood event (i.e. July 2022) has resulted in access via vehicle being lost for over 7 days. Given climate modelling, the NSW Government expects that these events will increase in frequency⁷⁸.

CPG therefore disagrees with the flood impact assessment (Appendix 21a) and flood risk assessment (Appendix 21b). Both of these are based on historical data dating back to the 1970s. This is not consistent with the NSW Government's advice on future flood impacts (which in turn is based on CSIRO climate modelling), that these events will be more frequent and more severe over the coming decades.

CPG disagrees with any conclusions drawn from the flood impact and risk assessments. These should be repeated with future modelling data, such as those provided by the NSW Government⁹.

Regardless, there is no doubt that the up to 400 greyhounds to be housed at the proposed facility will be left stranded on the site during periods when the site is inaccessible.

⁷ [AdaptNSW - Climate change impacts on storms and floods](#)

⁸ [NSW Water - New climate data and modelling](#)

⁹ [AdaptNSW - Climate projections used on AdaptNSW](#)

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The GRNSW DA does not provide more than cursory information that advice from a veterinarian via telephone or video link will be sufficient. CPG strongly disagrees with this. During a period of 7-10 days and with up to 400 greyhounds on site (in a stressed state because of the emergency and disruption to their routine) it is almost certain that a veterinary emergency will arise. It is highly likely that some of the greyhounds will have existing veterinary issues requiring treatment.

Under these circumstances staffing the facility with 6 or fewer staff is unacceptable. In particular, any kind of surgical intervention will not be possible, leaving the greyhound(s) without veterinary attention by a professional. This could be in contravention of the *Prevention of Cruelty to Animals Act 1979*.

Specifically, paragraph 3(c) of this Act specifies that:

(3) A person in charge of an animal shall not fail at any time -

(c) where it is necessary for the animal to be provided with veterinary treatment, whether or not over a period of time, to provide it with that treatment.

Knowing that the Bylong Park site will be cut off from emergency access several times annually for a period of up to 7-10 days, and knowing that this will be exacerbated over the coming decades, it would be irresponsible to house up to 400 greyhounds with behavioural issues at such a site.

4.2: Fires and drought

The applicant's response to issue 8.12 in the attachment Response to Submissions - Appendix B GYDE Part 1 indicates that firefighting equipment and roof sprinklers are not required from a bushfire design and compliance perspective.

Fire fighting units are available for a few thousand dollars each and the ability to extinguish embers that will enter the facility from the nearby National Park will greatly increase the safety of staff and greyhounds at the facility.

Building the facility without roof sprinklers means that embers will be able to get into the roof space and start fires. The plans provided with this DA clearly show many trees being planted. Over time therefore, the fire risk associated with the facility will increase as the trees mature. Not installing roof sprinklers is therefore short sighted and another indication that the facility will be nothing more than a greyhound warehousing facility, with minimum investment in staffing and safety equipment.

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AdaptNSW modelling data shows that rural NSW will also experience more and longer droughts¹⁰. GRNSW has not provided information to show how they will provide an uninterrupted water supply during these periods. They claim water will not need to be carried into the site but provide no evidence to refute the NSW Government's published modelling.

In the absence of such evidence, CPG rejects the GRNSW claims and is very concerned that there are no evidence-based strategies for ensuring uninterrupted access to water for the 400 greyhounds proposed to be housed at the site.

4.3: Snakes

Given the proximity to a watercourse, paddocks and bushland, staff and greyhounds will be exposed to a number of venomous snakes: tiger snakes, eastern brown snake, death adder and black snakes.

Rapid access to diagnosis (blood coagulation rates) and treatment (antivenom) is critical as permanent organ damage or death can occur within one or a few hours.

The remote location will mean that rapid access to a veterinary clinic will not be possible, especially when the property is cut off.

Given the importance of greyhound welfare for this proposal, GRNSW should supply information about how such situations will be managed.

¹⁰ [AdaptNSW - Climate change impacts on our agriculture](#)