



6 September 2023

Latrobe Council  
170 Gilbert Street  
Latrobe TAS 7307  
[council@latrobe.tas.gov.au](mailto:council@latrobe.tas.gov.au)

## **Submission on L-DA260/2022 - 353 Port Sorell Road, Wesley Vale Harness and Greyhound racing facility**

Thank you for the opportunity to make a submission on this Planning Application.

By way of background, the Coalition for the Protection of Greyhounds (CPG) is a not-for-profit organisation committed to ending greyhound suffering by exposing the cruelty and corruption of the greyhound racing industry and lobbying for law reform. We have members across Australia, including Tasmania. Our submission on this development application therefore focuses on greyhound related concerns.

CPG has concerns about this development application to Latrobe Council. This includes matters relating to fundamental greyhound safety and lack of information about how greyhound welfare will be assured.

### *Curved tracks are death traps for greyhounds*

The applicant, by proposing to build a curved greyhound track, ignores published information about greyhound safety and welfare risks associated with curved tracks. Much of section 4.2 of the application is dedicated to the economic benefits of the track. Not a single sentence is dedicated to clarify how greyhound safety will be managed to prevent injuries and deaths. As demonstrated by CPG's 2022 Lethal Tracks Report,<sup>1</sup> curved tracks have consistently resulted in thousands of injuries to racing dogs every year, including broken legs, which in most cases result in the euthanasia of the dogs. The fact that the applicant does not provide adequate risk mitigation strategies raises serious concerns about how greyhounds will be protected from racetrack injuries and deaths.

---

<sup>1</sup> <https://greyhoundcoalition.com/lethal-tracks-reports/>



In 2017, the University of Technology Sydney (UTS) released the report *Identifying Optimal Greyhound Track Design for Greyhound Safety and Welfare*. The report was commissioned by the greyhound racing industry. It analysed injury data and used computer simulation and modelling to identify improved track design. The report recommended straight tracks as the safest design to reduce injuries and deaths, stating "Clearly the best option is to use only straight tracks."<sup>2</sup> As an example, the "advanced" J-curve track at Traralgon VIC, designed by UTS, is now one of Australia's most dangerous racetracks.<sup>3</sup>

A recent ABC article cements the notion that curved tracks are guaranteed to result in greyhound injuries and deaths, recording a total of 386 injuries for 2022 in a similarly shaped track, with several sources contending that it is a "death trap" for greyhounds.<sup>4</sup> Ultimately, no tracks are 'safe', however, straight tracks pose lower risk for greyhounds.<sup>5</sup> Given current knowledge about risks associated with curved tracks, no greyhound racing facility should be approved that is not a straight track.

#### *Review of Tasmanian racing regulatory framework*

We are concerned about the timing of this development application, given the Tasmanian Government has opened a consultation on the *Racing Regulation and Integrity Bill 2023*. The Bill proposes a Tasmanian Racing Integrity Commissioner, that can set relevant standards for animal welfare. Due to the lack of animal welfare consideration in the development plan, the need for integrity standards is fundamental. According to the Bill's explanatory memorandum, the proposed reforms grant TasRIC the power to gather information, hold investigations, conduct inquiries and issue recommendations to participants in the racing industry. Given that such considerations have not been addressed in this application, Latrobe Council is at risk of considering the construction of a facility that does not meet Tasmanian laws.

#### *Proposed kennel sizes do not meet industry standards*

CPG is concerned about the lack of information regarding kennel size and insulation. There is considerable doubt that the kennels in the proposed plan can fulfil the 3m<sup>2</sup> recommended standard under 4.5 of the TasRacing Recommended Standards for the Care of Greyhounds.<sup>6</sup> The facility plan on page 102 of the application indicates there will be 96 kennels in a total space of 327.35m.<sup>2</sup> Based on the plan provided, about half of this space will be walkways

---

<sup>2</sup> [UTS-Track-Design-Phase-I-Report-FINAL-20170605.pdf](https://www.uts.edu.au/research/track-design-phase-i-report-final-20170605.pdf)

<sup>3</sup> <https://www.abc.net.au/news/2023-02-13/traralgon-greyhound-racetrack-injuries-calls-for-suspension/101959436>; <https://greyhoundcoalition.com/new-6m-safe-traralgon-track-proves-a-tragedy-for-greyhounds/>

<sup>4</sup> <https://www.abc.net.au/news/2023-02-13/traralgon-greyhound-racetrack-injuries-calls-for-suspension/101959436>

<sup>5</sup> <https://www.nature.com/articles/s41598-020-63678-1>

<sup>6</sup> [https://nre.tas.gov.au/Documents/Recommended\\_Standards\\_for\\_the\\_Care\\_of\\_Greyhounds.pdf](https://nre.tas.gov.au/Documents/Recommended_Standards_for_the_Care_of_Greyhounds.pdf)



providing access to the kennels. This means the greyhounds will be housed in spaces that do not meet TasRacing's standards.

#### *Noise related animal welfare concerns*

Researchers have concluded that acceptable ambient noise levels for dogs should be 20dB lower than that deemed to be acceptable for humans (i.e. 70dB).<sup>7</sup> A number of studies have shown adverse health and psychological effects of aircraft noise on humans<sup>8</sup> and that noise pollution is changing animal behaviours.<sup>9</sup> This application therefore should be considered a noise sensitive development due to the adjacent Devonport airport.

Additionally, as per section 5.2, the plan acknowledges the risk of aircraft noise to human health, yet does not address how such loud sounds can and will impact greyhound health and behaviour. The plan makes no effort to address these concerns and how it plans to mitigate injuries from potential behavioural issues caused by aggravating noises.

No information is provided by the applicant about how noise from aircraft approaching or taking off from the adjacent airport will affect dog behaviour during a race. However, given that TasRacing's Greyhound Policy Manual specifically advises about preventing noise related stress, it is reasonable to assume that aircraft noise will increase the risk of collisions on the race track, which will result in greyhound injuries and deaths. At a minimum, the applicant must provide information that allows the assessment of this risk.

The absence of noise level testing is especially concerning given plans to expand Devonport by extending runway length that could allow non-stop unrestricted payload jet services to Brisbane.<sup>10</sup> It is reasonable to assume that this will allow larger and noisier planes to use the airport. The Devonport master plan also mentions possible freight and logistics, processing works, storage, maintenance and assembly activities to be developed on the airport site, which are almost certain to increase ambient noise levels.

CPG also refers Latrobe Council to the National Airports Safeguarding Framework - Measures for Managing Impacts of Aircraft Noise,<sup>11</sup> which includes the following recommendations:

"17. It is important that consideration be given to the application of the following approach to land use planning:

---

<sup>7</sup> <https://www.psychologytoday.com/us/blog/canine-corner/202212/how-much-loud-noise-can-a-dog-tolerate>

<sup>8</sup> <https://theconversation.com/can-noise-pollution-damage-your-health-54016>

<sup>9</sup> <https://theconversation.com/how-noise-pollution-is-changing-animal-behaviour-52339>

<sup>10</sup> <https://tasports.com.au/news/devonport-airport-master-plan-2035>

<sup>11</sup> [https://www.infrastructure.gov.au/sites/default/files/documents/1.1.3\\_Guideline\\_A.pdf](https://www.infrastructure.gov.au/sites/default/files/documents/1.1.3_Guideline_A.pdf)



- i. no new designations or zoning changes that would provide for noise sensitive developments within a 20 ANEF where that land was previously rural or for non urban purposes (in keeping with AS2021).
- ii. Zoning for noise-sensitive development be avoided where ultimate capacity or long range noise modelling for the airport indicates either:
  - 20 or more daily events greater than 70 dB(A);
  - 50 or more daily events of greater than 65 dB(A); or
  - 100 events or more daily events of greater than 60 dB(A)...

31. A zone of influence around airports could be taken into account, depending on the amount of traffic at the airport. The following zones are approximations and should be used as guidelines only:

- Within 15 km of an international airport, major domestic airport, or major military aerodrome.
- Within 10 km of a domestic airport with regular scheduled public transport services.
- Within 5 km of any other type of aerodrome for which an ANEF chart is unavailable."

According to the proposed site plan, greyhound kennels are located near the car park. The applicant provides no information about how the noise from car park areas will impact greyhound behaviour. This has the potential to contravene 2.1.1 of the Greyhound Policy Manual, which states that kennels should be located away from excessive noise which causes stress.<sup>12</sup>

The applicant acknowledges the machinery noise from adjacent land plots, yet does not acknowledge a closer, more detrimental noise risk. The plan shows that there are an available 88 car spaces, along with overflow parking, combined with four bus spaces. The applicant has not provided information about these noise levels or their impact on greyhound stress levels.

#### *Misleading information provided in the application*

Employment and economic figures provided by TasRacing and quoted by the Tasmanian government are based on a 2021 IER report that was produced "to meet the requirements of Tasracing". The report cannot be considered objective or unbiased. Instead, it is designed to portray the industry in the most positive light possible.

IER reports use unaudited data, bad economic methodology and inflated job numbers to exaggerate the economic benefits of the racing industry. The approach used by IER is

---

<sup>12</sup> <https://tasracingcorporate.com.au/wp-content/uploads/2021/06/Greyhound-Policy-Manual-no-Governance-23-June-2021-1.pdf>



considered unreliable and misleading by economists, the Tasmanian Treasury<sup>13</sup> and the Australian Productivity Commission.<sup>14</sup>

Both this report and another Tasracing report produced by IER in 2013 use the multiplier effect to estimate the economic contribution made by the industry. The Tasmanian Department of Treasury and Finance has criticised this approach, describing it as “unreliable and problematic”. That’s because, as the Treasury points out, ‘if a multiplier effect was included for all existing industries in Tasmania when estimating their economic contribution to the State, the combined effect would be that Tasmania’s economy would be two or three times its current size’.

The Australian Productivity Commission points out that the ‘abuse’ of the multiplier methodology used by IER “primarily relates to overstating the economic importance of specific sectoral or regional activities”. The Commission goes on to say that despite its obvious limitations, multiplier analysis is used to “justify or support calls for injections of taxpayer funding”.

The 2021 Tasracing IER report also assumes that Industry Expenditure = Economic Growth, a highly questionable assumption, especially when as shown on page 13 of the report, 85.5% of the expenditure on greyhound racing is made by punters. This is mainly gambling money, which produces no “value added” or “growth” or “wealth”, but simply moves money from the pockets of the losers to the pockets of the winners, plus the state’s and the racetrack’s cut. Breeding, training, and feeding greyhounds accounts for less than 15% of the money spent in the industry. Much of it, if not all, would otherwise be spent on other activities if dog racing didn’t exist.

As pointed out by IER in the Tasracing report, “Taking the racing industry as an example, it is likely (under a scenario where it no longer existed) that much of the local resident spend would substitute to other activities.”

The 2021 IER Report claims that 1,515 full time equivalent (FTE) jobs are sustained by the Tasmanian racing industry. In late September 2021, Minister for Racing Howlett stated that “more than 5,500 Tasmanians are either employed in the industry or are direct participants”. However, the Treasury report told us that “according to the most recent ABS census data (2016), of the total workforce in Tasmania, 181 people derived their main income from the racing industry. This equates to 0.08% of the Tasmanian workforce.” More recently, the 2021 census shows 121 people full time employed by the racing industry, a reduction of 33%.

---

<sup>13</sup> <https://www.treasury.tas.gov.au/government-businesses/strategic-reviews/tasracing-2020-review>

<sup>14</sup> <https://www.pc.gov.au/inquiries/completed/rural-research/submissions/sub133.pdf>



These inflated numbers are partly a result of counting the same individuals doing multiple roles. IER acknowledges this duplication in their report methodology section, "There is some level of duplication in some of the participation categories resulting from an inability to deduplicate individual databases."

State governments are under constant pressure to justify supporting the racing industry with millions of taxpayer dollars. This is especially true for the Tasmanian racing industry which under a 20 year contract agreed in 2009, receives a minimum of \$27 million a year. In FY22, \$39 million of taxpayer money was used to prop up the racing industry. The remainder of Tasracing revenue was gambling money. Another taxpayer funded enquiry into Tasracing in 2010 found that "the ongoing indexed \$27 million funding model fails to tie funding to performance and is irrespective of revenue earned".

IER reports also ignore one of the most basic economic principles in order to exaggerate the benefits of the racing industry. There is no mention of the enormous economic and social loss borne by the community and the animals. KPMG estimated the cost of gambling addiction at \$17bn in 2020. Thousands of dogs are bred, exploited and discarded every year by the racing industry. They die in their hundreds on lethal racing tracks and thousands are injured.

In summary, CPG is of the view that the development application should be rejected because it:

- proposes a curved racing track, which is guaranteed to cause more greyhound injuries and deaths than a straight track
- preempts the outcomes of the Tasmanian Government's consultation on the *Racing Regulation and Integrity Bill 2023*
- fails to provide greyhound kennelling in accordance with TasRacing guidelines
- fails to address greyhound safety and welfare concerns relating to stressful noise levels
- provides information that exaggerates the importance of the racing industry to the Tasmanian economy.

CPG is happy to provide any other information Latrobe Council may require.

Regards,

**Coalition for the Protection of Greyhounds**

