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CPG submission on DA/0200/2223 - Greyhound racing straight track

Thank you for the opportunity to make a submission on this Development Application (DA).

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.

CPG objects to this proposed development on a number of grounds related to social and economic impacts in the locality, public interest, insufficient engagement with the Traditional Owners and inadequate evidence to support a number of aspects of the DA. Specifically, it is our view that the following matters mean that the requirements of Section 4.15 of the Environmental Planning and Assessment Act 1979 No 203 have not been met:

4.15 (1) (b) the likely impacts of that development ... social and economic impacts in the locality,

The negative social impacts of a new racetrack

Australians suffer the biggest gambling losses in the world at around \$25bn a year. KPMG estimates that gambling addiction costs Australians around \$18bn a year in money, mental health, family breakdown, workplace productivity and loss of life. Available information suggests gambling is already on the increase in the Goulburn Mulwaree Council area.¹

¹ <https://www.goulburnpost.com.au/story/7216674/poker-machine-use-increased-by-19-per-cent-across-goulburn-mulwaree-and-upper-lachlan/>



Research published in the respected medical journal Lancet shows that 4% of suicides are gambling related, but that this figure could be much higher.²

The recent Federal government report "You win some, you lose more" reported that 63% of people who bet on racing in 2022 were classified at risk of harm. 5% of 16-17 year-olds bet on sports and horse and dog racing. The report also highlighted that, unlike sports, dog and horse racing only exists so people can gamble, and that Wagering Services Providers are targeting the most vulnerable in the community.

The NSW Government taxes gambling losses and passes it on to the greyhound racing industry to keep it afloat and to promote the gambling cycle of harm. This is money diverted from healthcare, education, infrastructure and other areas critical to the whole community. Very few people are interested in going to greyhound racing tracks now gambling has moved online.

The negative community impacts of increased racing

An increase in greyhound racing will inevitably result in increased anti-social behaviour. According to monitoring by Animal Liberation, in 2023 (to 30 November), the NSW Greyhound Welfare and Integrity Commission has recorded 129 charges against those involved in NSW greyhound racing, with 60 of these involving the use of prohibited substances, or doping of greyhounds.

Recent media articles on regional greyhound racing have included:

- A greyhound racing participant was found guilty of "wilfully assaulting an employee by rubbing his groin and penis on the employee's buttocks" at a race meeting.
- Two Gunnedah trainers found guilty of racing greyhounds with prohibited substances
- "It's been alleged greyhounds were used as a cover in drug deals, which took place at various locations, including race tracks. The drugs are alleged to have been supplied across the Central West."

² <https://www.abc.net.au/news/2023-09-19/study-finds-4pc-suicides-gambling-related-could-be-higher/102857512>, [https://www.thelancet.com/journals/lanwpc/article/PIIS2666-6065\(23\)00221-3/fulltext](https://www.thelancet.com/journals/lanwpc/article/PIIS2666-6065(23)00221-3/fulltext)



The exaggerated economic impact of greyhound racing

The racing industry commissions consultants to produce reports designed to influence politicians and councils to support greyhound racing. However, these reports use unaudited data, bad economic methodology and inflated job numbers to exaggerate the economic benefits of the racing industry.

Economic claims by GRNSW and the Greyhound Breeders, Owners and Trainers Association (GBOTA) are based on IER reports that have been exposed as "unreliable and problematic" by the Tasmanian Treasury, Australian Productivity Commission, and economists. Most of this money is gambling money with a very small percentage actually generated by or for the community.

GBOTA's claims of over 4,000 full time jobs in the NSW greyhound racing industry are inflated and misleading. The latest ABS census figures (2021) show only 2405 full time equivalent employees across the entire NSW dog AND horse racing industries. The greyhound racing industry's positive impacts on local employment are therefore negligible and are outweighed by the adverse impacts caused by gambling.

4.15 (1) (e) the public interest

Animal welfare concerns

Greyhound NSW notes that a straight track will "improve animal welfare", but this ignores the reality. Australia currently has four straight greyhound tracks. In 2023, they killed four dogs on-track and four off-track. They have caused 691 total injuries, including 138 serious injuries.

New-build racetracks and redeveloped tracks have not reduced greyhound casualties. In NSW, where the state government has funded a \$30m track safety program, serious injuries have increased 36 percent in 2023 over 2022.

The Richmond NSW complex includes both an oval and a straight track. This venue is currently the deadliest greyhound track in Australia, with 11 deaths and 647 injuries in 2023.



Greyhound racing is rapidly losing its social licence and, as shown in a recent national survey, the majority of Australians believe greyhound racing should be phased out.³

The proposed straight track at Goulburn will inevitably lead to more greyhound suffering. There is significant public interest in greyhound injuries and deaths, as evidenced by the regular media reports.⁴ It is inevitable that such media reports will result from any race tracks built in Goulburn. Therefore, in assessing this DA, Goulburn Mulwaree Council should consider whether the reputational damage caused by such reports are in the public interest.

The DA includes no data on the effectiveness of noise mitigation measures

The applicant's response to submissions notes that the surrounding Goulburn Rodeo Club has "traditional congregation, parking and heavy vehicle loading/unloading areas". Such noise will increase the risk of greyhound deaths and injuries as some greyhounds will become more agitated.

The DA's Traffic Report states that the Goulburn Recreation Area has approximately 24 user groups with 204 general car parking spaces. This can be potentially detrimental during events, such as the Goulburn Show. The DA makes no acknowledgement of this and does not provide a noise mitigation strategy or risk assessment. Considering the fact that one of the goals of the greyhound track is to "encourage additional tourism", there must be an acknowledgement on how this additional noise can affect greyhounds in races. Even if the straight track is only used twice a week in the afternoon and the evening, the combination of all the aforementioned noise will still impact greyhounds and increase the likelihood of severe injury or death.

The DA Environmental assessment notes that the "solid fencing and vegetation" will serve as a "noise barrier" between greyhounds and horses, yet makes no note about how other surrounding noises will be effectively mitigated. In the absence of any noise measurement data showing the extent to which the noise barriers will reduce noise, especially during busy periods. CPG believes that these data must be provided to allow Goulburn Mulwaree Council with information they need to decide on this DA.

³ <https://greyhoundcoalition.com/greyhound-racing-survey/>

⁴ <https://www.smh.com.au/politics/nsw/the-reason-nsw-is-seeing-a-spike-in-greyhound-dog-deaths-and-injuries-20230818-p5dxk6.html#>,
<https://greyhoundcoalition.com/another-young-greyhound-dies-on-western-sydneys-safe-track/>



Finally, the Stakeholder Engagement Report does not include any engagement whatsoever with the region's Traditional Custodians. This is a serious oversight and must be addressed.

In summary, there is no doubt that greyhound racing will have detrimental impacts on the local community, including those caused by problem gambling, the greyhound racing sector has a proven record in overinflating the economic benefits of their activities and the majority of Australians believe greyhound racing should be phased out. CPG recommends that Goulburn Mulwaree Council reject this application.

Regards

Coalition for the Protection of Greyhounds

