



COALITION FOR  
THE PROTECTION  
OF GREYHOUNDS

## SUBMISSION

# Tasracing Code of Practice for Racing Greyhound Welfare

*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.*

July 2026

# CPG comments on the Tasracing Code of Practice for Greyhound Welfare (the Code)

## Euthanasia

The proposed definition of euthanasia provides that *"Euthanasia may only be performed by a person other than a veterinarian in exceptional circumstances, and in such circumstances, must be performed using humane methods"*.

**Standard 9.9** provides, among other criteria, that a participant can shoot, or arrange for the shooting of, a greyhound on the basis that their attempts to contact a veterinarian failed.

CPG notes that Standard 13 of the *Veterinary Service Standards and Guidance Notes*, published by the Veterinary Board of Tasmania, allows for veterinary telemedicine and remote triage. The proposed definition and Standard 9.9 raises concerns that a liberal interpretation may be taken by industry participants wishing to rid themselves of greyhounds no longer able to race.

Tasracing has limited capability to undertake in depth investigation and ascertain the circumstances that may lead to an industry participant deciding to shoot a greyhound, or arrange for its shooting. In particular, when the body has been cremated or buried for several days, it will be very difficult for Tasracing to identify an abuse of the euthanasia provisions.

The argument that a veterinarian was not contactable due to reception issues is not acceptable, as Standard 3.2 specifies that participants must ensure access to 24-hr veterinary advice. Most veterinary clinics provide mobile numbers for access to 24-hr veterinary advice, so participants will always be able to get advice when needed. The current wording of the second part of Standard 9.9b therefore is in direct conflict with the Standard 3.2.

### Recommendation 1

Amend Standard 9.9b from

*"a veterinarian has been consulted, but is unable to attend in a timely manner, **or** all reasonable attempts to consult a veterinarian have failed (such attempts need to be documented);"*

to

*"a veterinarian has been consulted, but is unable to attend in a timely manner."*

## Retired greyhounds

CPG is concerned about the lower standards of care that the proposed Code provides for retired greyhounds. This appears to contradict Tasracing's comment on page 3 of the Code that *"The purpose of this Code is to specify minimum standards ... to meet the physical and behavioural needs of a racing greyhound throughout its lifecycle in accordance with the Five Domains..."*

This implies that standards essential for the quality of life of retired greyhounds must also apply to such greyhounds. CPG is of the strong view that the standards outlined in this part of our submission must also apply to retired greyhounds. Not doing so undermines the entire purpose of the Code and is almost certain to produce dogs that will be difficult to rehome.

### Health and welfare standards

Standard 3.1 specifies that participants must inspect their greyhounds at least twice daily.

Standard 3.2 specifies that participants must have reliable access to a veterinarian able to provide 24-hour advice. These two standards do not apply to retired greyhounds.

If participants are not required to inspect their retired greyhounds at least twice daily, there is a risk that ill or injured retired greyhounds will remain undiagnosed for unnecessarily long periods. This is unacceptable from an animal welfare perspective.

#### Recommendation 2

Amend the Code to specify that Standards 3.1 and 3.2 must also apply to retired greyhounds.

### Housing and environment standards

Standard 5.5 prohibits the use of vehicles, caravans, trailers, portable crates and the crawl space under any dwelling as long-term housing for racing greyhounds.

Standards 5.7 and 5.8 specify minimum and maximum temperatures, air filtration and lighting requirements for housing of racing greyhounds.

Standard 5.9 specifies minimum size requirements for racing greyhound housing areas.

Standard 5.12 provides requirements for sleeping areas; specifically, that these must be sufficiently large for a greyhound to lay completely stretched, the bedding must be warm, soft, dry and safe, and that privacy must be provided.

None of these standards apply to retired greyhounds. This means that retired greyhounds could be kept in portable crates that don't provide enough space for natural movement, and they could be kept in environments with little or no light.

CPG is of the view that given the incentive to minimise costs associated with keeping retired greyhounds (which may be a necessity given the oversupply of retired greyhounds), such dogs need the same protections as racing greyhounds.

**Recommendation 3**

Amend the Code to specify that Standards 5.5, 5.7, 5.8, 5.9 and 5.12 must also apply to retired greyhounds.

**Transporting greyhounds standards**

Standards 6.2, 6.3 and 6.4 specify that compartments/cages used for transporting racing greyhounds must be weatherproof, temperature controlled and minimum size, and that the dogs must be allowed to drink, exercise and toilet every 3 hours. These standards do not apply to retired greyhounds.

This raises the risk that individual or multiple retired greyhounds will be transported in conditions that do not protect them from rain or hot or cold temperatures, or they may be stuck in their compartments/cages for more than three hours. In these circumstances, the participant would not be in breach of these standards. They may be in breach of Standard 6.1 (general requirement about transport must not be likely to cause injury or stress), but this would be more difficult to enforce than the clear requirements of Standards 6.2, 6.3 and 6.4.

**Recommendation 4**

Amend the Code to specify that Standards 6.2, 6.3 and 6.4 must also apply to retired greyhounds.

**Exercise, socialisation and enrichment standards**

Standards 7.2, 7.11 and 7.12 provide for regular contact with other vaccinated dogs, a minimum of 60 minutes of exercise outside the greyhound housing area and how the Exercise, Socialisation and Enrichment standards in this Code will be met. These standards do not apply to retired greyhounds.

Taken with the issues raised above regarding lower housing and environment standards for retired greyhounds, CPG is concerned that retired greyhounds could be housed in small, dark, uncomfortable facilities without any interaction with other dogs.

CPG notes the requirement for “appropriate socialisation” in Standard 9.1. It is therefore puzzling why no specific requirements are included in this section of the code to ensure appropriate socialisation is provided. Not including such requirements for retired dogs will result in lack of clarity for participants and inconsistent approaches, which in turn impacts negatively on rehoming.

**Recommendation 5**

Amend the Code to specify that Standards 7.2, 7.11 and 7.12 must also apply to retired greyhounds.

## Greyhound breeding

The introduction to the Code emphasises the importance of owners taking complete responsibility for greyhounds in their care from whelping through to retirement and rehoming.

Currently, industry and community adoption programs are unable to cope with the number of greyhounds requiring homes each year. This has also led to greyhounds being privately rehomed by participants.

This is not recommended, with the RSPCA stating *"There are significant concerns about greyhounds reported by industry participants as 'kept as a pet' or privately rehomed, because there is no independent verification of where they go, who receives them, or how they are cared for. There is little or no oversight by the industry in terms of the suitability of the new home and ongoing health care."*

Section 4. Greyhound Breeding includes a number of standards associated with the objective of breeding greyhounds in a *"safe and responsible manner"*.

Given this, a critical omission from the Code is linking breeding numbers to rehoming capacity.

### Recommendation 6

Amend the Code to specify that annual breeding approvals are capped at verified rehoming capacity. Rehoming should be defined in the Code as *"transitioning a retired greyhound into a domestic, family environment in Australia"*.

## Other recommendations

### Controls on tethering greyhounds are needed

The Code does not limit the use of tethers, nor does it specify that tethered dogs must be supervised at all times. This requirement is included in equivalent codes in other jurisdictions, for example NSW. CPG believes this requirement must be included in the Code due to the animal welfare risks associated with tethered dogs, such as dehydration, heat exposure and strangulation.

#### Recommendation 7

Amend the Code to specify that greyhounds must be supervised while tethered, and that greyhounds must not be tethered for more than 1 hour per day. These requirements must apply also to retired greyhounds.

### Transfer of greyhounds

Standard 9.8 states the following:

*"It is an offence for a participant to transfer a greyhound in circumstances where the participant knows, or ought to know, or has reason to believe, that the greyhound may be **ethanased.**"*

In the CPG report *Current state of racing regulation: Tasmania*, CPG noted evidence that the "disappearing" of greyhounds happens in Tasmania, as it does in all other states where data is available. CPG considers any retired greyhounds, whose whereabouts cannot be ascertained or whose bodies have been buried without veterinary certificate, to have been 'disappeared'.

CPG strongly recommends that Standard 9.8 be amended to include means of destroying the greyhound other than euthanasia, because it is likely that that's how 'disappeared' greyhounds are killed.

#### Recommendation 8

Amend the Standard 9.8 to read as follows:

*"It is an offence for a participant to transfer a greyhound in circumstances where the participant knows, or ought to know, or has reason to believe, that the greyhound may be **ethanased or destroyed by other means.**"*

## Artificial insemination

CPG is pleased that the Tasmanian Government, via Tasracing, has taken the opportunity to end the antiquated and unnecessarily painful practice of surgical artificial insemination, as recommended by the Australian Veterinary Association.

### Recommendation 9

Retain the current wording of Standard 4.14, i.e.

**"Artificial insemination** *must only be carried out by a veterinarian using the transcervical technique.*"

## Whelping boxes

Standard 5.16 states that *"Whelping boxes should be warm enough and shielded from draughts to protect puppies from hypothermia."*

CPG believes the word "should" is inappropriate as these boxes **must** be warm and shielded from draughts. If they are not, they cannot protect puppies from hypothermia, especially during the cold months in Tasmania.

### Recommendation 10

Amend Standard 5.16 to read as follows:

*"Whelping boxes must be warm enough and shielded from draughts to protect puppies from hypothermia."*

## ABOUT THE COALITION FOR THE PROTECTION OF GREYHOUNDS

The Coalition for the Protection of Greyhounds is committed to a ban on greyhound racing. Until that happens we fight to end the suffering of greyhounds in the racing industry. Our campaigns are designed to influence public opinion and target state governments.



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