



Inquiry into Greyhound Racing NSW



**Submission prepared by:
Coalition for the Protection of Greyhounds**

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Coalition for the Protection of Greyhounds



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Submission responding to Terms of Reference

TERM OF REFERENCE 1

Greyhound welfare and the care of greyhounds by GRNSW, including management and compliance with welfare standards and any welfare concerns relating to GRNSW's management of greyhound adoption and rehoming programs, including facilities, and its other functions under the Act



Due to the need to breed enough greyhounds to ensure sufficient dogs who are suitable for racing, each year, dogs are bred who are considered superfluous to the needs of the industry because they are unsuitable for racing. Often it is not possible to match the number of dogs bred to the capacity to rehome retiring or unraced greyhounds, leaving these healthy dogs homeless and subject to euthanasia.

What are the animal welfare issues with greyhound racing?

KnowledgeBase, RSPCA Australia

1.1 Uncontrolled overbreeding

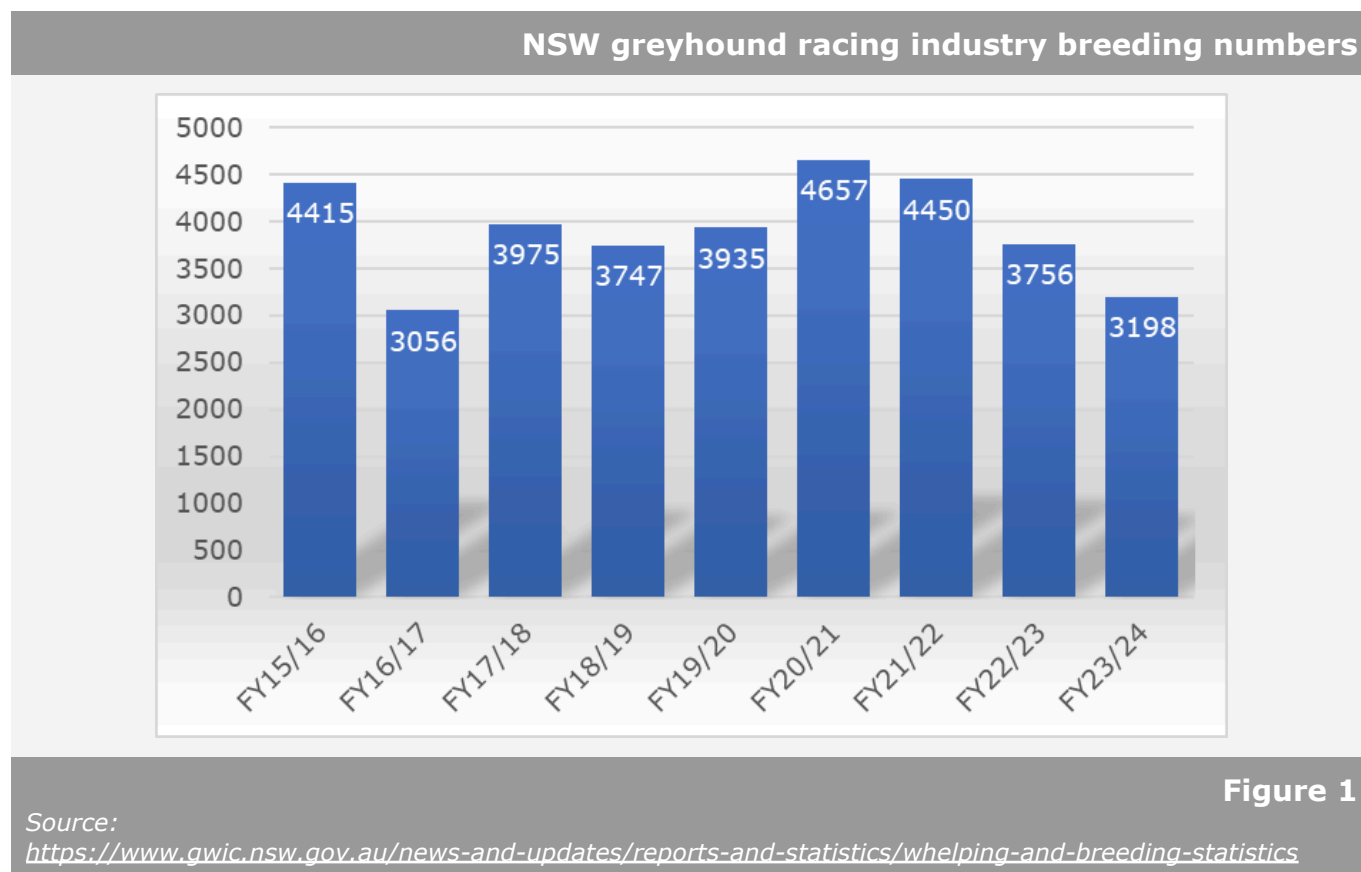
Despite the GRNSW Joint Working Group recommending a state-wide breeding quota in 2016, GRNSW continues to allow breeding of greyhounds at an unsustainable and uncontrolled rate.

Greyhounds Australasia failed to gain agreement to its [Strategic Plan](#) 2020-2022 (pg 10) "Agreement of nationally sustainable quality breeding targets as part of a strategy to manage the national greyhound racing population", so an industry-driven response in NSW is unlikely.

This further highlights that GRNSW is failing to meet its obligation under the Breeding Function of its Operating Licence: *(a) The Licensee must continue to advocate for a national industry approach to breeding controls for greyhounds."*

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While the latest information is that greyhound breeding numbers in NSW are lower than in previous years, this is not due to GRNSW taking any action to control overbreeding. As shown in the graph below, breeding rates are not constant and periods of reduced breeding are followed by increased breeding rates.



There may be a number of factors that impact the number of greyhounds bred, for example the current cost-of-living crisis. To ensure that decisions are not made on temporary fluctuations in breeding rates, a breeding cap must be introduced that is evidence-based. For example, breeding caps should be linked to the capacity of the industry to rehome ex-racing greyhounds.

In NSW, GWIC has the power to introduce a breeding cap via a local rule of racing.

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The sole purpose of greyhound racing is to generate profits, either through gambling, winning races or breeding. In order to maximise profits, you need a winning dog. This results in thousands of greyhounds being bred each year in pursuit of the fastest dog.

The term used for the excess dogs in greyhound racing is "wastage", which is defined as "the action or process of losing or destroying something by using it carelessly or extravagantly; wasteful or avoidable loss of something valuable".

Free the Hounds "Incentivised Breeding"

<https://www.freetheshounds.com.au/incentivised-breeding/>

1.1.1 Encouraging 'initial wastage'

In 2022, according to GRNSW, around 29% of greyhounds bred in NSW were surplus to requirements. Many of these dogs remain unnamed as a greyhound only requires a name when it is added to the racing register.

Unnamed pups who are considered unsuitable for racing are very vulnerable. There is no incentive to ensure their wellbeing or that they are added to eTrac, the GWIC partial tracking system. Once given away to third parties who are not industry participants, the whereabouts and welfare of these pups is unknown, ie they have '[disappeared](#)' from the records.

GRNSW incentivises greyhound 'wastage' by offering ever-increasing levels of prize money and other participant payments. This includes travel fees which are appearance money paid for every dog raced whether or not it places. This encourages participants with little or no skills or experience to become registered breeders.

This focus on profit at the expense of dogs' lives was highlighted in 2023 in a letter sent from GRNSW to industry participants. The letter estimated that a proposed ban on gambling inducements would take more than \$20m a year out of the NSW greyhound racing industry. GRNSW said "*that would eat up all our welfare programs plus all of GAP and all rehoming, plus all of our safety programs put together*".¹ There was no mention of any reduction in prize money or other participant payments, despite these making up the bulk of GRNSW expenditure as shown in the figure below.

1

<https://www.theguardian.com/sport/2023/aug/27/nsw-greyhound-industry-claims-ban-on-gambling-ads-would-result-in-dogs-suffering>

GRNSW Expenditure, FY23

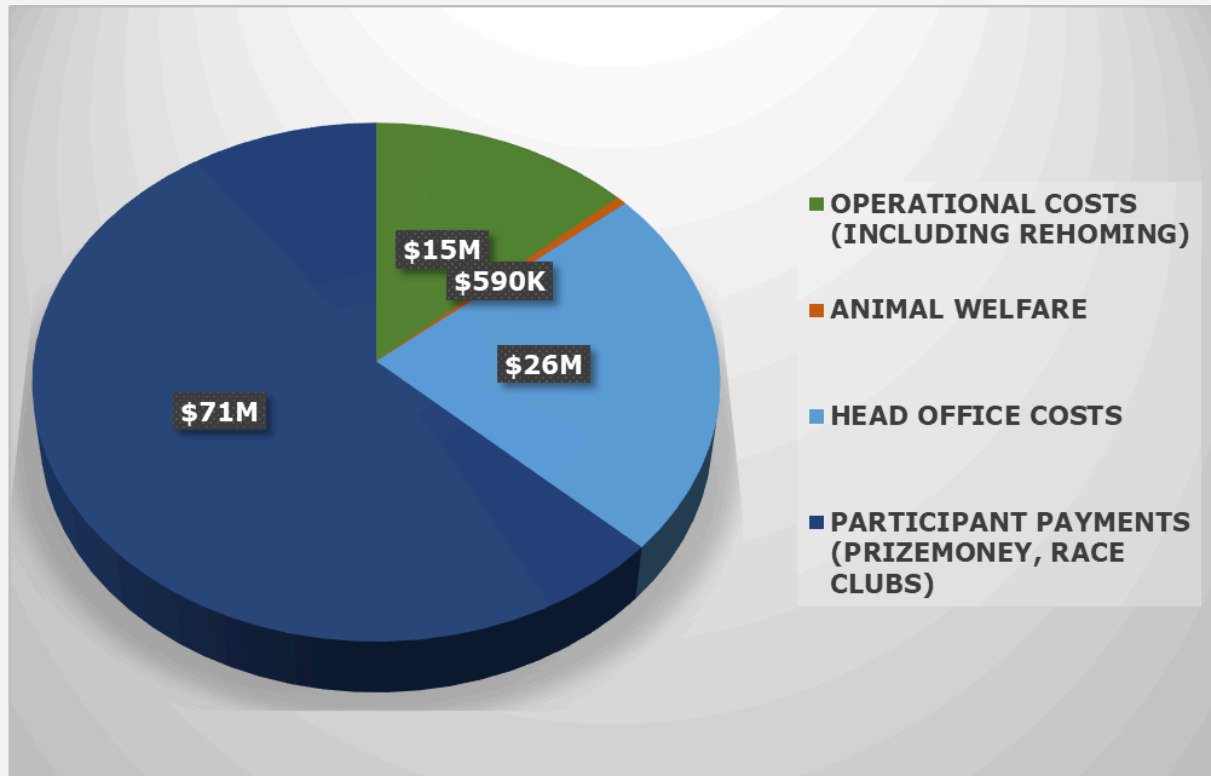


Figure 2

Source: <https://www.grnsw.com.au/about-us/reporting/annual-report>

Overbreeding and wastage is also encouraged by the NSW Government which uses taxpayer money to inflate prize money offered to industry participants. In June 2021, the then NSW Racing Minister Kevin Anderson announced a new financial arrangement that would see GWIC funded by the NSW Government rather than by GRNSW. The Minister stated this would remove “the burden of funding GWIC’s operations from the commercial body, freeing up millions of dollars which can be reinvested in facilities and prize money”.²

2

https://www.gwic.nsw.gov.au/_data/assets/pdf_file/0008/991223/Kevin-Anderson-med-rel-NSW-Government-Invests-in-greyhound-racing-future.pdf

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"the most significant contributor to immediate wastage is the number of greyhound pups whelped each year that are simply uncompetitive. Some of these greyhounds are discarded by the industry without having any racing careers. Additional greyhounds are discarded following a racing career of short duration."

Special Commission of Inquiry into the Greyhound Racing Industry in NSW
Michael McHugh AC QC, 16 June 2016

1.1.2 Irresponsible breeding by unskilled breeders

The potential consequences of irresponsible breeding practices that have plagued the greyhound racing industry raise questions about the qualifications required to be licensed as a breeder in NSW:

- be 18 or older
- hold a current National Police History Check
- have a certificate of completion for the [registration knowledge check](#)
- This involves reading the [Being a Greyhound Breeder Handbook](#) and completing the online Registration Knowledge Test ([see here](#))

Individuals can become licensed greyhound breeders without understanding the risks and benefits of selective breeding. This lack of oversight can lead to a higher prevalence of genetic disorders and inbreeding within the greyhound breeding community.

A good example of this is the eye disease Pannus of which the industry itself says, "*There is thought to be a [significant genetic inheritance](#)*". There should be no breeding from dogs with Pannus. Many dogs arrive at greyhounds rescue groups with untreated Pannus, so the racing industry certainly knows which racers carry this inheritance.

The specific requirements for becoming a qualified greyhound breeder also have serious potential implications for the health of the breed, genetic diversity, and overall welfare of greyhounds.

While some steps are being taken to promote basic genetic education,³ social factors such as demand for racing dogs or ownership laws can negatively affect greyhound welfare. This impact is exemplified by the recent revival of the sport driven by a surge in online gambling revenue, which has contributed to an unsustainable breeding cycle.⁴

³ For example, Greyhound Racing Victoria, [Developing a breeding program - understanding genetics](#); GWIC, [Being a Greyhound Breeder: Greyhound Welfare & Integrity Commission handbook](#), p.10.

⁴ Sydney Morning Herald, [Online gambling driving surge in greyhound breeding, rescues inundated](#).

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As part of their Operating Licence under the Greyhound Racing Act 2017, GRNSW is required to *"develop training and accreditation programs to meet the Commission's registration requirements for Greyhound Racing Industry Participant in compliance with all applicable laws and professional standards (Training and Accreditation Programs)".* CPG was unable to find any information regarding training and accreditation programs on the GRNSW website.

Additionally, the GRNSW Annual Report FY22/23 contained no program details as required under the Operating Licence, *"a summary of the Training and Accreditation Programs it provides; the number of Greyhound Racing Industry Participants completed Training and Accreditation Programs; and the outcome of annual review to ensure Training and Accreditation Programs remain best practice."*

1.1.3 Cruel, unethical Surgical Artificial Insemination

Surgical artificial insemination (surgical AI) is a cruel and unnecessary procedure which is banned in a number of countries overseas and opposed by all veterinary and animal welfare bodies. In the UK, surgical AI is banned under animal welfare legislation which restricts surgical mutilation to animals.⁵

The Australian Veterinary Association (AVA) states that: *"Surgical artificial insemination (AI) must not be performed in dogs. Welfare considerations indicate that only non-surgical artificial insemination may be performed. All states and territories in Australia should adopt the prohibition of surgical AI in dogs, in their respective Animal Welfare Acts."*

GWIC estimates that 80 percent of greyhound breeding involves surgical AI.⁶ This very high rate is driven by the mistaken assumption that surgical AI offers better rates of impregnation compared to less invasive and unethical procedures such as trans-cervical AI.

GWIC's handbook 'Being a Greyhound Breeder' states: *"Done by an experienced and proficient person, this method [trans-cervical AI] can be completed quite quickly, and the results are thought to be similar or superior to the surgical method."*

Greyhounds Australasia has recently announced that surgical AI should be prohibited in the greyhound racing industry from 1 January 2026. This is an unacceptable delay, given there is a far more effective and ethical alternative readily available.

In addition, given that the RSPCA has condemned surgical AI for years, GRNSW has failed completely to proactively act on it as a key greyhound welfare issue. Given this - how can it claim to be a [world leading](#) body?

⁵ Animal Welfare Act 2006, UK, Section 5(3); [Standards & advice update: January 2019](#),

⁶ [Letter](#) from the NSW Minister for Agriculture to the CEO/Greyhound Racing NSW, July 2022 (exact date missing from correspondence provided to CPG).

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1.1.4 NSW GAP's lack of support for greyhound adopters

CPG regularly receives complaints from members of the public about the state GAPs' lack of response to them when they need advice or guidance after having adopted a GAP dog. GAP NSW is no different. By comparison, CPG has never received a complaint about the poorly funded volunteer-run greyhound rescues which do a great job supporting adopters, who then return to them for further adoption when their current greyhound dies.

GAP NSW's performance must improve in this regard and to ensure this:

- GRNSW should annually engage an independent third party auditor to review customer satisfaction regarding support received from NSW GAP,
- the auditor should release the findings publicly and advise the NSW Minister for Racing of any shortcomings,
- the auditor should include analysis of what percentage of adopters are returnees, ie who return to adopt a subsequent GAP dog.

TERM OF REFERENCE 1:

RECOMMENDATION 1A. Urgent introduction of an evidence-based breeding cap by GWIC, as the industry has proved unable to do this. Evidence to be considered should include the combined capacity of GRNSW's GAP and community-based organisations to rehome greyhounds.

RECOMMENDATION 1B. GRNSW to implement training and accreditation programs for industry participants in support of GWIC's registration requirements for industry participants. These programs should be reviewed annually to ensure best practice and specific program details should also be included in GRNSW Annual Reports.

RECOMMENDATION 1C. Archaic breeding practices such as surgical artificial insemination (surgical AI) must be immediately banned by the NSW Government in relevant legislation, while GRNSW must actively discourage the practice among its participants and report on these efforts in its annual reports.

RECOMMENDATION 1D. The trade in greyhound semen requires NSW government regulation to force the market to be ethical in its approach to greyhound insemination and protect NSW's biosecurity.

RECOMMENDATION 1E. GRNSW must annually engage an independent third party to assess customer satisfaction with its GAP adoption processes. The auditor must release its findings publicly and report to the NSW Minister for Racing on any shortcomings. The auditor must also include analysis of what percentage of adopters are returnees, ie who return to adopt a subsequent GAP dog.

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1.2 GRNSW rehoming crisis

In FY23/24, NSW bred more than twice the number of greyhounds that were accepted for rehoming through GRNSW's rehoming arm, the Greyhound Adoption Program (GAP)⁷.

There is no evidence that the escalating rehoming crisis as highlighted by the Greyhound Welfare and Integrity Commission (GWIC) in the graphic below is slowing. Note that the shortfall between greyhounds needing homes and homes available for them is increasing at around 30% a year.

NSW greyhound rehoming crisis

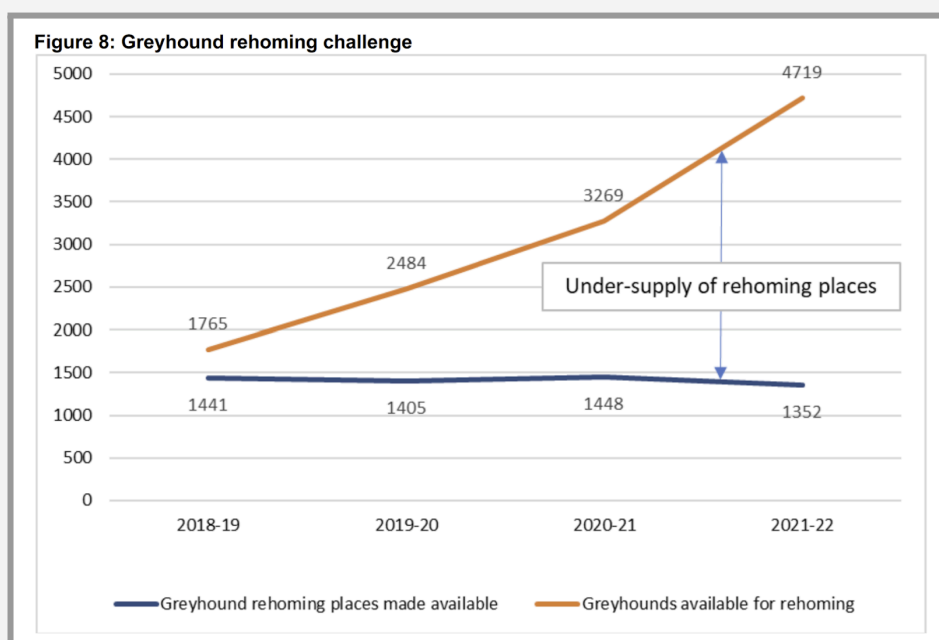


Figure 3

Source:

https://www.gwic.nsw.gov.au/__data/assets/pdf_file/0013/1102801/April-June-2022-v2.pdf

It is impossible to know how many of these dogs actually end up being adopted into homes as GRNSW does not provide these details. This contradiction between GWIC retirement and GRNSW rehoming numbers is particularly evident in GWIC's latest quarterly Greyhound Lifecycle Report for FY23/24.⁸

⁷

https://www.qwic.nsw.gov.au/__data/assets/pdf_file/0006/1328829/Apr-Jun-Life-Cycle-Report-2024-RECONCILED-V2.pdf

⁸ Ibid

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The report shows a massive 210% increase in the number of dogs retired to GAP with no explanation. Given the lengthy waitlist for dogs entering GAP and the unexpected closure of the GAP Wyee premises in 2024, it is highly unlikely that these dogs are being rehomed into Australian homes.

Worse still, media revelations about greyhounds dying in transit and the warehousing⁹ of Australian ex-racers in North American kennels have confirmed CPG's worst fears.

1.2.1 The deadly US rehoming program

The GRNSW US rehoming program is an inappropriate and dangerous solution to the industry-created rehoming crisis with lack of input from animal welfare organisations and no external auditing of the program.

Some NSW greyhounds have died in transit and many are languishing in US kennels rather than Australian homes. GRNSW is also sending greyhounds to the US to serve as PTSD companion animals after only a few weeks of training. According to Assistance Dogs Australia, this sort of training normally takes around two years.¹⁰

CPG's many concerns about the GRNSW US rehoming program were confirmed over the past few months with a raft of allegations from previous and current GRNSW employees.

According to Guardian Australia articles:

- A current GAP employee, who requested anonymity to speak about the situation, said executives insisted on [sending dogs to the US that "weren't suitable"](#), including those that had higher grade heart murmurs or pannus, a type of eye disease.
- The dogs would be [counted as having been "rehomed"](#), even if they were just going to "sit in a kennel" or be transferred to another adoption centre in the US.
- A former GAP employee has alleged that: "We'd follow up with the rescues in America ... and many of them would be [still be awaiting adoption and in kennels](#). And that would be months."
- A controversial scheme sending retired racing greyhounds to the US has recommenced despite the [death of two more dogs](#) in transit, a [New South Wales](#) parliamentary committee has heard.

⁹

<https://www.theguardian.com/australia-news/article/2024/may/25/they-couldnt-care-less-fears-for-dogs-welfare-as-greyhound-racing-nsw-axes-one-of-two-adoption-centres>

¹⁰ <https://www.assistedogs.org.au/services/ptsd-service-dog/>

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It is of concern that a GWIC audit of the US rehoming program found that “GRNSW is compliant with the Best Practice Guidelines in its management of the ‘Aussie Mates in the States’ Rehoming Program.”¹¹

CPG encourages GWIC, or perhaps more appropriately an agency totally independent of the NSW racing industry, to implement the following recommendations made in the audit report:

- a centralised governance structure to improve oversight of the program,
- a centralised database to increase visibility over the program; major US partners already have systems in place that could be readily adapted for this purpose,
- GRNSW should be required to report on the death of any greyhound in the program
- GRNSW should support professionalisation of partner agencies which, though very effective, are largely volunteer based,
- as the US-based program partners have ongoing contact with adopters, GRNSW should be required to provide annual updates of a representative sample of greyhounds,
- the program should be reviewed annually, for the first three years, to ensure its ongoing appropriateness.

1.2.2 GRNSW fails to meet Operating Licence rehoming function

The GWIC audit recommendations listed in Section 1.2.1 above highlight that GRNSW is failing to meet some of its obligations under the rehoming function of its Operating Licence as below. Not just with regards to the US rehoming program, but across all aspects of the rehoming function.

GRNSW OPERATING LICENCE FUNCTION

11. Rehoming

(a) All rehoming programs administered or funded by the Licensee must use best practice, as recognised by the Commission's Greyhound Industry Animal Welfare Committee, to assess the compatibility of a greyhound with prospective owners before permanently rehoming them.

(b) All rehoming programs administered or funded by the Licensee must verify the outcomes of a reasonable representative sample of rehomed greyhounds as part of auditing requirements and make this information available to the Commission when requested.

(e) The Licensee must report rehoming data from Greyhounds as Pets, as well as other programs supported by the Licensee, to the Commission on a quarterly basis, from the commencement of this Operating Licence.

¹¹

https://www.gwic.nsw.gov.au/data/assets/pdf_file/0006/1283874/Aussie-Mates-in-the-States-Report.pdf

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1.2.3 Conditions at GAP Wyee and other GAP rehoming facilities

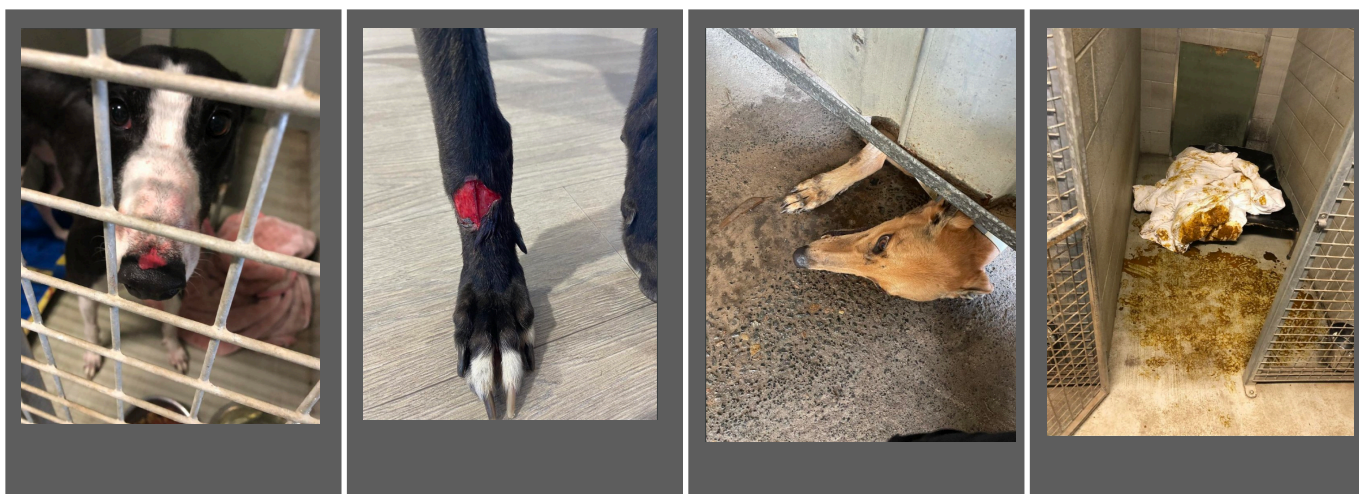
GAP NSW workers employed at the Wyee rehoming facility were [fired on 20 May 2024](#), the same day that GRNSW announced they would cut 30% from their budget in the next financial year due to a 22.5% drop in wagering revenue.

Since that time, ex-GRNSW employees have described conditions at Wyee as being unsafe, dirty and sub-standard. Dozens of photographs that showed appalling conditions and dreadful treatment of greyhounds at Wyee were sent to the media, a few are included below. Given the availability of photo metadata, there is no reason for doubt about the photos submitted.

Other claims included:

- most of the 50 greyhounds are being sent to boarding facilities or other GAPs; some of the dogs were/are on specialised medication or are in the middle of behaviour modification plans and programs,
- 13 of the dogs were sent to the US in an unprepared state (Puddles, Dusty, Pete, Cooper, Aimee, Tina, Rosie, Buster, Trent, Latte, Rebel, Spider, Hazel),
- another GAP facility, at Londonderry, is being overwhelmed with the influx of dogs, with staff working long hours to adequately care for the dogs,
- an expensive dog training program was introduced, but was more appropriate for four-week old puppies than four-year old greyhounds "with PTSD".

CPG is aware that a report on the conditions at GAP Wyee prepared by GWIC has been provided to the Inquiry. CPG would encourage the Inquiry and the Minister to make the report available to the public.



Photographs showing conditions at Wyee GAP

Source: <https://greyhoundcoalition.com/media-resources/poor-care-standards/>

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1.2.4 Impact of neglect and social deprivation on rehoming

A [national survey](#) conducted by CPG showed that greyhounds are still leaving the racing industry in a neglected and stressed condition. This highlights that many dogs do not receive the most basic care, physically or mentally.

Eighteen community-run rehoming charities were surveyed regarding the condition of dogs at the time of surrender from owners and trainers. The survey found that the health of the dogs is mostly poor. Almost 90% of those surveyed said that the dogs taken into their care came with pre-existing conditions that required veterinary care, including bad teeth and conditions related to poor diets, such as bad coat condition. Some dogs were also unable to walk up or down stairs, had untreated wounds from track racing and weren't socialised for rehoming.

While fewer dogs are now being killed during their time in the NSW racing industry, many of the dogs which are emerging have significant fear-based behavioural issues. These dogs require investment of considerable time and money to rehabilitate for life as a pet. While the community rescues are "no-kill", GAP NSW will euthanase those dogs whose owners have failed to socialise them for a life post-racing.

1.2.5 Greyhound retirement scheme (puppy bond)

CPG is concerned that the current rehoming crisis, coupled with the cost-of-living pressures, will incentivise the further 'disappearing' of greyhounds. Introducing a breeding cap has been mentioned already, see Section 1.1 above. However, CPG recommends that in addition to a breeding cap, a greyhound retirement scheme must be established.

Briefly, the Greyhound Board of Great Britain (GBGB) has introduced such a scheme.¹² Under this scheme, a greyhound owner is required to deposit £200 at the time they register their greyhound. GBGB matches this amount to create a £400 bond that funds costs associated with rehoming the greyhound at the end of its racing career. At this point, the bond is released to the rehoming organisation.

CPG is of the strong view that GRNSW must develop a greyhound retirement scheme in NSW. However, CPG notes perverse incentives in the GBGB scheme, specifically, if a trainer keeps a greyhound or the greyhound dies while registered, the owner is reimbursed the bond. Similarly, if an owner rehomes the dog to a third party, the bond is issued to the third party. These conditions could provide incentive for owners or their third parties to game the scheme for personal profit, at the expense of the greyhounds.

A puppy bond was recommended by the McHugh inquiry, but was never implemented. This is entirely unacceptable with regard to [public expectations](#) regarding animal welfare.

¹² <https://www.gbgb.org.uk/greyhound-retirement-scheme/>

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1.2.6 Greyhounds rehomed by industry participants to third parties

GRNSW allows greyhounds to be rehomed to unvetted third parties - owners giving them away privately, without ensuring the adopters' suitability. This raises the concern that greyhounds are 'disappeared': CPG considers any retired greyhounds, or greyhound litters, whose whereabouts cannot be ascertained or whose bodies have been buried without veterinary certificate, to have been '[disappeared](#)' from official records.

The RSPCA recommends against direct rehoming to unidentified third parties. The RSPCA [says](#) - "*Third party adoptions (i.e., those not through organisations like GAP) should be verified and followed up to ensure they are genuine.*" Adoptions through community-based volunteer greyhound rehoming groups are not problematic as these groups carefully verify each adoption.

The disciplinary action decisions published by GWIC show that a number of industry participants were found to have 'rehomed' greyhounds to third parties without notifying GWIC.¹³ This behaviour is also present in other jurisdictions.¹⁴ In some cases, the greyhounds were killed by the third parties, and in other cases, the dog's whereabouts could not be ascertained.

Based on published case outcomes, these behaviours are more prevalent in other states; however, given the current rehoming crisis it must be expected that industry participants will be looking at ways to avoid, or reduce, costs associated with keeping non-racing greyhounds.

CPG understands that the inquiry is focused on GRNSW. However, given that both GRNSW and GWIC play important roles in ensuring greyhound welfare - and roles that are often closely linked - it is only to be expected that some of CPG's recommendations will relate to GWIC functions where they would facilitate GRNSW's work in protecting greyhounds from harm.

¹³ Some examples: https://www.gwic.nsw.gov.au/_data/assets/pdf_file/0006/1288671/GWIC-Disciplinary-Action-Decision-Trevor-Rice-7-February-2024-final_V2.pdf, https://www.gwic.nsw.gov.au/_data/assets/pdf_file/0018/1300608/Colin-Wasson-Disciplinary-Action-Decision.pdf, https://www.gwic.nsw.gov.au/_data/assets/pdf_file/0007/1043395/GWIC-Disciplinary-Action-Decision-Death.pdf

¹⁴ <https://greyhoundcoalition.com/racing-regulation/>

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1.3 Quality of life of non-racing greyhounds

1.3.1 Greyhounds retained by industry participants

The latest GWIC Lifecycle report shows that in the FY23/24 1,332 non-racing greyhounds were retained by an industry participant.¹⁵ This is a 239% increase from the previous financial year number of 557, which was already a higher retention rate than any other year since FY18/19.

GWIC notes that this increase may be due to the requirement for eTrac check-ins and that GWIC staff have made extensive effort to contact owners of older greyhounds unlikely to race again, encouraging them to submit retirement notifications.

The report also states that nearly 3,200 greyhounds were in their 'post-racing' stage as at 30 June 2024. Given the critical oversupply of non-racing greyhounds, CPG has concerns about the welfare of any dog that is kept by an industry participant and remains within the industry.

CPG is very concerned that under the [NSW Greyhound Welfare Code of Practice](#), these dogs can be caged for 23 in every 24 hours meaning they will live out their lives miserably, locked in a kennel without adequate socialisation, exercise or health care. It has also recently emerged that GRNSW is paying trainers to house greyhounds that GAP cannot accommodate, raising serious questions about oversight. GWIC lacks jurisdiction once greyhounds enter GAP NSW¹⁶, making welfare monitoring challenging. For example, if an infraction was found upon inspection, it's unlikely the regulator could take any action. This is completely unacceptable.

Data published by GWIC in its latest Lifecycle report adds to CPG's concerns: the rate of death by accident or injury, illness or old age and natural or unknown causes rose 139% from FY22/23 to FY23/24. Based on published GWIC disciplinary action decisions, we know that in NSW, industry participants kill or 'disappear' greyhounds, see Section 1.2.6 above. This is also common in other jurisdictions.¹⁷

There should be no doubt that non-racing greyhounds that remain in the industry are at serious risk of neglect, or worse. Despite eTrac, GWIC is simply not resourced to identify and prevent the suffering of greyhounds, whether it be physical suffering, or psychological suffering from being locked up in a kennel. For example, most greyhound facilities are located in isolated regional areas and GWIC can't visit them all every year.

¹⁵

https://www.qwic.nsw.gov.au/_data/assets/pdf_file/0006/1328829/Apr-Jun-Life-Cycle-Report-2024-RECONCILED-V2.pdf

¹⁶ [Emails](#) - GWIC CEO and NSW Animal Liberation, September 2024.

¹⁷ <https://greyhoundcoalition.com/racing-regulation/>

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1.4 No birth to death tracking

GRNSW promotes the GWIC eTrac system as a whole-of-life tracking system. However, there is no tracking of dogs once they are no longer actively racing, such as those dogs rehomed privately by industry participants, sent interstate, or dumped at pounds.

Currently, there is no connection between eTrac and the NSW Companion Animals Register (CAR). CPG understands both systems are based on the same IT platform. CPG understands that a greyhound must be registered on the CAR before it can be rehomed. Building a linkage between eTrac and CAR would therefore improve tracking greyhounds within NSW, noting that whole-of-life tracking would not be possible for greyhounds moved interstate.

1.5 Greyhound export

GRNSW has a long history of allocating absurdly lightweight penalties for participants who involve themselves in greyhound [export](#), see [here](#). Instead, this infraction should be penalised in line with unlawful killing of a greyhound as export to a banned country is little more than a death sentence for an ex-racing dog.

It is vital that GRNSW severely penalises any participant for allowing a greyhound to be exported to a banned country, or, for selling a greyhound to a person who is not a registered participant in a country approved for export. This would avoid the well established practice of participants selling a dog to a third party who then exports it, while the participant wrings their hands and claims - *'I knew nothing about it'*.

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RECOMMENDATION 1F.

GRNSW must report on its website on an ongoing basis:

- which individual greyhounds are being sent to the USA;
- each greyhound death that occurs in transit (with necropsy reports);
- the arrival date for each greyhound in the USA, plus the date it arrives at and leaves a rehoming facility;
- which adopted greyhounds are returned to each facility, the date this occurs , plus how long the dog then re-stays in the facility and departs;
- which greyhounds shipped to the USA are not adopted and what happens to them if not adopted.

RECOMMENDATION 1G.

GRNSW must introduce a greyhound retirement scheme that includes the following:

- a greyhound rehoming charge payable for every greyhound whelped,
- the charge must be sufficient to cover average costs per dog incurred by rehoming groups; a regular review of the charge would provide an incentive for owners to ensure that greyhounds enter rehoming programs in good health;
- the charge must be paid when the greyhound is registered, irrespective of whether it is named or not; greyhounds are not registered unless the charge has been paid in full for each dog;
- the revenue raised from the greyhound rehoming charge is held in a bank account; funds can be withdrawn from this account only for the purpose of providing a rehoming scheme payment to an accredited non-industry greyhound rehoming service.

RECOMMENDATION 1H. GRNSW must report in its annual report on:

- what efforts it makes to ensure that its industry participants socialise their dogs according to the NSW Greyhound Code of Practice; and
- what penalties it allocates for failure to do so.

RECOMMENDATION 1I. GRNSW must report in its annual report on:

- what action it takes to end third party rehoming;
- how many third party adoptions it detects in NSW;
- what penalties it allocates to industry participants who rehome to third parties.

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RECOMMENDATION 1J. eTrac functionality to be expanded to include:

- mandatory logging of socialisation and exercise periods for every greyhound, including retired racers retained by their owners
- allowing accredited greyhound rehoming groups to enter health and behavioural information about greyhounds they receive
- allowing adopters of retired greyhounds to enter information about health issues, such as osteosarcoma and pannus (to allow identification of conditions that may be inherited).

RECOMMENDATION 1K. The welfare and location of every dog not found at registered premises must be determined. Failure to identify the whereabouts and welfare status of the greyhound attracts the same penalty as those for animal welfare rules involving the death of the greyhound.

RECOMMENDATION 1L. The NSW Government to:

- prioritise and fund connection of the eTrac and CAR databases,
- engage with other states to build a national birth to death tracking capability.

RECOMMENDATION 1M. GRNSW must severely penalise any participant for allowing a greyhound to be exported to a banned country, or, for selling a greyhound to a person who is not a registered participant in a country approved for export.

Submission responding to Terms of Reference

TERMS OF REFERENCE 2 & 5

GRNSW's processes and management; and

GRNSW management's response to compliance or concerns regarding organisational and workplace culture.

This submission focuses on the animal welfare failings of GRNSW with an emphasis on the NSW greyhound rehoming crisis driven by uncontrolled breeding.

Current and former GRNSW employees, business partners and industry participants are better placed to respond to Terms of Reference 2 and 5 of this Inquiry.

However, CPG would like to emphasise how deeply concerned we are by ex-chief vet Alex Brittan's report, allegations from GRNSW whistleblowers and associated extensive media coverage. These all provided insight into the failure of GRNSW to meet its responsibilities regarding its processes and management; and response to compliance or concerns regarding organisational and workplace culture.

As the Inquiry would be well aware, to many in the community this is yet more evidence that the greyhound racing industry is unreformable.

This erosion of public trust is reflected in the fact that the majority of Australians both oppose greyhound and the funding of the greyhound racing industry.

This recent Sydney Morning Herald poll reveals the level of public opposition, with further evidence regarding public opinion available [here](#).

Poll on banning greyhound racing

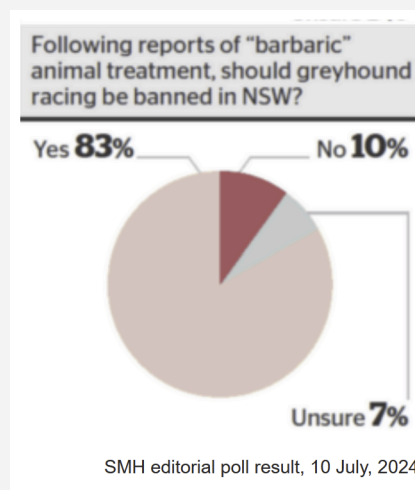


Figure 4

Source: Sydney Morning herald, 10 July 2024

Submission responding to Terms of Reference

TERM OF REFERENCE 3

Accuracy and reporting by GRNSW in relation to greyhounds and whether that reporting represents the true state of the greyhound racing industry, including the welfare of greyhounds and the state of related programs under GRNSW's control, awareness and oversight.

3.1 Withholding race track death and injury data

Neither GRNSW nor GWIC will release data on the number of greyhounds killed at each NSW track. CPG records data from each steward's report and compiles it into a national database where comparisons can be made. Compare this lack of information to the track data published in the Queensland Racing Integrity Commission reports as shown below.

QRIC racetrack injury data

Greyhound Breeding, Race Injury and Retirement Quarterly Report (Q3) January 2024 – March 2024

5. Reported injuries by track

Table 5. Number of greyhound race starters and all injuries at Queensland race meetings from January to March 2024.

Venue	Surface	Starters	Total number of injury incidents	Total injury incidents per 1000 starters	Total deceased or euthanised on track	Deceased or euthanised on track per 1000 starters
Albion Park	Sand	4179	148	35.42	0	0.00
Bundaberg	Grass	1072	61	56.90	0	0.00
Capalaba	Grass	1344	44	32.74	0	0.00
Ipswich	Sand	4162	157	37.72	3	0.72
Rockhampton	Sand	1145	43	37.55	0	0.00
Townsville	Sand	1961	36	18.36	0	0.00
Totals		13,863	489	35.27	3	0.22

Figure 5

Submission responding to Terms of Reference

3.2 Withholding key data on mortality

The greyhound racing industry fails to disclose key information in the Greyhound Life Cycle Report. Note these exclusions from the 1 April – 30 June 2024 report, for FY23/34 data:

- 506 dogs underwent medical euthanasia not at racetrack for illness and injury, but these important categories are not broken down. What were the main illnesses? What were the key injuries and what caused them?
- 194 dogs died due to accidents and injury, a 34% increase YOY. But the category breakdown is not provided. What caused the accidents or injuries, and, were they suffered in training and trials?
- 181 dogs died from "natural or unknown causes", 44% more than the previous year. This figure has to be broken down further as this critical data is opaque, eg how many unknown causes were there and what were the causes of the "natural" deaths?
- 125 dogs died from "illness or old age", a 40% increase. What type of illnesses and what were the age groups for mortality?

More detail about these categories is essential, as it is likely that the decrease in racing deaths can be attributed to the increase in deaths off-track, particularly if deaths are reported by participants themselves.

3.3 The urgent need for non-industry vets

The Brittan report highlighted two cases of alleged poor practice by racing industry vets. Allegations have also been made against racing industry vets in other states. To ensure the highest animal welfare standards, independent, RSPCA-provided vets must be involved in the greyhound racing industry.

GRNSW encourages injured dogs to be transported to industry vet hospitals despite the availability of suitable veterinary care available at a closer location. At the 2023 "Million Dollar Chase", three dogs who were seriously injured at Wentworth Park were transported to an industry vet hospital located 45 minutes away.

Submission responding to Terms of Reference

3.4 Removing racing incidents from race videos

GRNSW regularly censors race videos in order to present a false report of racetrack safety and to misrepresent the true state of greyhound racing. Race videos are either totally removed from GRNSW's The Dogs website (<https://www.thedogs.com.au/racing>), the incidents edited out, or camera angles changed to minimise the chance of showing negative incidents.

The censored incidents include images of falls, breakdowns, and injuries where a greyhound was euthanased.

In August 2020, GRNSW CVO Michelle Ledger stated that: "It is common practice for GRNSW to edit sensitive footage which may upset sensitive viewers." This confirmed that disturbing scenes of greyhound suffering regularly occur on racetracks. Note that these scenes are broadcast live and unedited. Also please note that the racing industry encourages children to attend race meetings and also recruits 12-year-olds as junior track attendants.

GRNSW will not release the censored videos on request. And neither will GWIC pressure GRNSW to change its approach. Censored race videos present an inaccurate and false state of the greyhound racing industry. The censorship removes a threat to the industry narrative that racetracks are safe.

By censoring race videos, GRNSW is admitting the community won't accept the ongoing abuse and harm of greyhounds. GRNSW aims to protect its social licence by concealing the racing experience of greyhounds.

Evidence

During one sample period, CPG recorded the [following examples](#) of race video censorship:

Example of change in camera angle to restrict viewing of controversial scenes.

- Richmond Straight track: initial camera angle that shows dogs colliding in catching pen
<https://www.thedogs.com.au/racing/richmond-straight/2022-02-12/1/ladbroke-bet-ticker-maiden?trial=false>
- Later camera angle that removes viewing of catching pen
<https://www.thedogs.com.au/racing/richmond-straight/2022-06-11/1/ladbroke-mat-es-mode-maiden-heat-1-maiden-series-h?trial=false>

Submission responding to Terms of Reference

3.5 Misrepresentative reporting in the media

To counter media coverage of the negative aspects of greyhound suffering, GRNSW formed a partnership with Australian Community Media (ACM) to publish pro-racing, paid articles. When this campaign started, ACM owned over a hundred mastheads across Australia, including the *Canberra Times*, the *Newcastle Herald*, and the *Illawarra Mercury*.

Hundreds of articles written by GRNSW appeared in ACM publications. A rider appearing at the bottom of the articles admitted that: "This article was produced as part of an ACM partnership with Greyhound Racing NSW".

As promotional pieces, these advertorials failed to mention any negative aspect of greyhound racing, such as deaths, injuries, and participant crimes and offences. They also likely reduced the chances of any objective and critical editorial coverage appearing in these publications. CPG recorded a [sample](#) of ACM articles over a period of time.

One reason for the campaign was revealed in the GWIC Industry Participants Advisory Council (GIPAC) meeting in February 2021. According to the minutes: "Peak Industry Bodies Meeting. Those who were in attendance included Tony Mestrov (GRNSW), Wayne Billett (GRNSW), Shayne Stiff (Greyhound Club NSW President), John Patton (Wagga and District Greyhound Racing Club Chief Executive), Steve Noyce (GBOTA) and New Deputy CEO of GRNSW. During this meeting, the Coalition for the Protection of Greyhounds was discussed and how to be more proactive with the media, to address certain issues including a casual or catastrophic injury etc."

A more recent example of a marketing campaign designed to misrepresent the state of the greyhound racing industry occurred prior to the publication of the Brittan report in July 2024. A GRNSW advertising blitz of full-page ads in newspapers in early July 2024 proclaimed "That was our best year ever".

The full-page ads appeared in the Bathurst Western Advocate (six times), Dubbo Daily Liberal (six), Newcastle Herald (five), Illawarra Mercury (five), Orange Central Western Daily (four), Tamworth Northern Daily Leader (three), The Land (one), and the SMH at least once. CPG recorded images of all the full page ads [here](#).

**SERIOUSLY, THANK YOU.
THAT WAS OUR
BEST YEAR EVER.**

**NSW GREYHOUND
RACING HAS JUST
ACHIEVED THE SPORT'S
BEST YEAR IN HISTORY.**

- RECORD RE-HOMING**
with 2,806 greyhounds assisted to pet life
(up from 415 in 2018).
- RECORD PRIZE MONEY**
of over \$55 million (up from \$26 million in 2018).
- IMPROVED SAFETY & WELFARE**
Record investment in track safety, zero unnecessary
euthanasia, and lowest ever track mortality rate.
- ZERO TOLERANCE**
approach to wrong-doers.
- ACCELERATED FEMALE PARTICIPATION &
GENDER EQUALITY**
with 15% of total employment at GRNSW now female.

In 2023-24 the NSW greyhound industry became the first animal racing jurisdiction in the world to genuinely introduce and enforce a policy of Zero Unnecessary Euthanasia.

Thank you and congratulations to our thousands of participants across the regions of NSW and all of our partners and dedicated supporters as we continue to drive new standards.

From the NSW Greyhound Alliance

Submission responding to Terms of Reference

3.6 Off-track injuries/scratchings

The true nature of injuries has been concealed by the racing industry's discontinuation of recording the details of pre-race injury scratchings.

Moreover, a new format used for GWIC stewards' reports changed the previous system of recording pre-race injuries which resulted in less data being provided. Only injuries of late scratchings are now published.

CPG asked GWIC to return to the previous system but the request was rejected. This serves to restrict external scrutiny of the welfare of racing greyhounds. Compare the current GRNSW/GWIC system of not reporting pre-race scratchings to the Racing Queensland format of publishing shown below:

Ipswich 17 September 2024:

Scratchings	R2 Bogie Colt – Ineligible, under penalty 13/09
	R2 Waka Waka – Ineligible, won maiden
	R2 Eternal Winter – Illness, scours
	R3 Flipper King – Ineligible, under penalty 13/09
	R4 Sirius Coco – Injury, offside shoulder
	R5 Tiki Bar – Injury, offside wrist
	R7 Bush Manoeuvre – Ineligible, under penalty 14/09
	R8 Brownlow – Illness, vomiting
	R10 Rusa Range - Ineligible, under penalty 14/09
	R11 Winter Night – Seasonal
	R12 Sirius Lizzie – Illness

Submission responding to Terms of Reference

3.7 IER reports - misleading economic data

GRNSW commissions a regular supply of reports from consultancy firm IER Pty Ltd. These claim to measure the economic benefit to society of the greyhound racing industry. GRNSW and the NSW government then use these reports to justify the use of taxpayer money to fund animal racing.

The reports produced by IER should not be confused with 'Independent Expert Reports' which are required by the Australian Securities & Investments Commission to provide impartial and credible advice.

3.7.1 An unreliable and problematic approach

The approach used by IER and GRNSW has been exposed as unreliable and problematic by economists, state treasuries, and the Australian Productivity Commission.

The economic contribution numbers are what's known as "value-added" which the Australian Productivity Commission has criticised as often overstating the "*economic importance of specific sectoral or regional activities*", particularly when calling for injections of taxpayer funding.

The NSW Government Treasury has reported on the "*inherent shortcomings and limitations of multipliers for economic impact analysis*". They highlight six key issues with this approach including two issues directly related to the unconstrained model used by IER and GRNSW.

The GRNSW Annual Report FY22/23 incorporates excerpts from the latest GRNSW IER report. This includes the claim that greyhound racing "sustained" 4343 full time equivalent (FTE) jobs in FY22/23. According to the ABS 2021 census, there were 2405 FTE workers employed in the entire NSW racing industry across thoroughbred, harness, and greyhound, compared to the over 31,000 positions claimed by IER and the NSW racing industry.

3.7.2 Omission of key information on gambling harm

Dog racing is a gambling industry. Australians suffer the biggest gambling losses in the world at around \$32bn 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.

IER and GRNSW, and by extension the NSW Government, omit any mention of these enormous financial and social costs. They also fail to include details of the community greyhound rehoming groups who deal with a constant stream of dogs cast off by the racing industry. The private costs in terms of time, money and emotional health are overwhelming.

For more information and sources, please see CPG's [NSW Smoke and Mirrors report](#).

3.8 Unreliable and misleading rehoming data

GRNSW does not provide a breakdown of rehoming numbers in its annual reports, making it impossible to know how many discarded greyhounds actually ended up in suitable homes as companion animals. For example:

- GRNSW claimed it rehomed 2,202 greyhounds in FY22/23, while GWIC reports reveal that only 1,322 dogs were retired to GAP NSW, rehomed privately by industry participants or kept by industry participants on retirement.
- GRNSW rehoming numbers also include retiring greyhounds whose owners received financial assistance with desexing, dental and booster vaccinations - this is not rehoming.
- GRNSW does not provide key details of their US rehoming programs regarding housing on arrival, rehoming preparation, number of dogs adopted into homes and the number of dogs euthanased.
- GRNSW conceals the number of greyhounds accepted into the Greyhound Care Scheme 2.0 and those euthanased for treatable injuries.

Submission responding to Terms of Reference

TERM OF REFERENCE 3

RECOMMENDATION 3A. The NSW greyhound racing industry publishes death and injury data about each NSW greyhound racetrack and trial track.

RECOMMENDATION 3B. GRNSW to work with GWIC to expand the range and quantity of mortality data after discussion with animal welfare groups.

RECOMMENDATION 3C. GRNSW to commence a trial of RSPCA-appointed vets at selected race meetings.

RECOMMENDATION 3D. That GRNSW stop the practice of removing or editing race videos:

- All race videos and trial videos must be published in their entirety.
- GRNSW to publish complete race videos where race videos have been removed or edited.

RECOMMENDATION 3E. GRNSW ceases the misleading and misrepresentative advertorial campaign with ACM publications.

RECOMMENDATION 3F. GRNSW works with GWIC to publish the reasons for pre-race scratchings in each stewards' report.

RECOMMENDATION 3G. The NSW Government should:

- investigate the reliability and independence of the information provided by Greyhound Racing NSW and its paid consultancy firm IER Pty Ltd,
- publish independently audited information regarding the economic and social impact of the taxpayer-funded NSW greyhound racing industry including negative spillovers.

RECOMMENDATION 3H. GRNSW should report openly and transparently in its annual report on all matters outlined in Section 3.8 by using an independent third party data expert which releases its findings publicly and reports to GWIC on any outstanding matters.

Submission responding to Terms of Reference

TERM OF REFERENCE 4

Performance and effectiveness of GRNSW's functions under the Act and the GRNSW Operating Licence in relation to racecourse safety, management and compliance with minimum track standards.

4.1 GRNSW must act on GWIC injury reports

GWIC publishes quarterly greyhound injury reports.¹⁸ These reports include commentary on conditions or issues that may have contributed to increases in track deaths and injuries. There is no evidence that GRNSW takes this information into account when making decisions about the suitability of race tracks or environmental conditions.

As an example, the injury reports for Q1, Q3 and Q4 of 2022 and Q1, Q3 and Q4 of 2023, identified that wet track resulting from heavy rain may have been responsible for the observed increase in track injuries. There is no evidence that GRNSW has taken this into consideration, as races are routinely held even during heavy rain.

4.2 Failed 'safe' track program

In 2017, the NSW Government [announced \\$30m in funding](#) for a five-year Greyhound Racing Capital Grants Program designed to bring all NSW racetracks up to minimum safety standards. While funding was approved under the Program in FY17/18, GRNSW didn't release its Minimum Standards for Racecourse Design and Construction until June 2020.

It wasn't until late in 2021 that GRNSW completed an [audit of all NSW tracks](#). Also, in July 2021, GRNSW released its [Strategic Plan FY22-FY24](#) stating it was scheduled to deploy the \$30m in Government funding by 30 Jun 2023. According to the [NSW Government Office of Racing](#), as at 27 September 2024, \$19m remains unspent. GRNSW has still provided no information on which tracks meet minimum standards.

¹⁸ <https://www.gwic.nsw.gov.au/news-and-updates/reports-and-statistics/injury-report>

Submission responding to Terms of Reference

Function 10.2 of the GRNSW Operating Licence states states "(b) *The component of the minimum standards dealing with racecourse design is to be informed by the University of Technology Sydney research Identifying optimal greyhound race track design for canine safety and welfare*" and "(c) *must revise and update the minimum standards for racecourse and training facilities every five years, and at least by 1 January 2025, based on latest research in track design, to ensure that the standards remain contemporary and meet best practice.*"

The UTS report referred to in Function 10.2 stated that "Approximately 80% of all catastrophic and major injuries were caused by congestion and incidents such as checking, collision and galloping." This led to the report's primary recommendation that "Clearly the best option is to use only straight tracks."

UTS also stated that the Australian greyhound industry should "reconsider their aversion to straight tracks and consider developing purpose-built straight tracks". Other key recommendations were that the number of greyhounds in each race be reduced from eight to six and that an extended lure be installed at all tracks. These recommendations have generally been ignored by GRNSW.

Under its Operating Licence, GRNSW is required to update minimum standards for racecourse and training facilities by 1 January 2025. It is worth noting that in late 2023 UTS severed its ties with the NSW racing industry after an integrity and governance review.

4.3 Double arm lures

When under external scrutiny for problems in animal welfare and racetrack safety, the greyhound racing industry will often introduce so-called solutions or strategies that aim to minimise criticism.

Double-arm lures are one such tactic, which are being promoted as new "safe" technology" for racing, and which the Labor Government offered as one reason why the Drake Inquiry should not consider the closure of the NSW greyhound racing industry.

Racing Minister David Harris said on ABC Radio Sydney, 11 July 2024: "There are a whole range of initiatives that have been put in place like dual-arm lures." However, analysis of stewards' reports by CPG shows that the number of deaths and injuries on NSW tracks using double-arm lures is still unacceptably high.

Submission responding to Terms of Reference

4.3.1 Deaths in NSW races using double-arm lures

Dapto

19 Oct 2023 **Bullet Blonde** - foreleg compound fracture - euthanasia
 19 Oct 2023 **Gillenbah Star** - foreleg compound fracture - euthanasia

Plus: 11 Apr 2024 **Sketchy In By** - injured - metatarsal fracture 60 day standdown -
 Deceased status in eTrac: Sub-Status: Deceased - Natural Causes

Wentworth Park

17 Feb 2024 **Omega Texas** - shattered front legs - euthanasia
 2 Mar 2024 **Oceanside** - wrist and hock fractures - euthanasia
 17 May 2024 **Self Sink** - spinal fracture - euthanasia
 21 Sep 2024 **Ruby's Wish** - foreleg intraarticular humeral fracture, seizures and
 suspected head trauma - euthanasia

Plus: 15 Jun 2024 **Fascinate Mel** - injured - open fracture all 4 metatarsals hindleg 90day
 standdown - Deceased status in eTrac: Sub-Status: Deceased -
 Accidental Causes (*confirmed by GWIC as an off-track racing death*)

NOTE: In CY2023 a total of two greyhounds were recorded as on-track racing deaths on
 Wentworth Park track.

Dubbo

19 Feb 2024 **About Gemma** - Multiple compound fractures of both front legs -
 euthanasia [first use of double-arm lure]

Plus: 25 May 2024 **Little Bronte** - injured - foreleg fracture 90day standdown -
 Deceased status in eTrac: Sub-Status: Euth. - Injury

Plus: 8 Jun 2024 **Tralee Destiny** - injured - foreleg compound fracture
 90day standdown - Deceased status in eTrac:
 Sub-Status: Euth. - Injury

The Gardens

22 May 2024 **Whinge And Win** - injured - Neck injury and multiple lacerations,
 90day standdown, Deceased in eTrac: Sub-Status: Euth. - Injury

Submission responding to Terms of Reference

4.3.2 Injuries in NSW races using double-arm lures

Dapto 1 Aug 2023 - 19 Sep 2024

279 total injuries (inc 85 Cat D injuries)

Dubbo 19 Feb 2024 - 23 Sep 2024

113 total injuries (inc 22 Cat D injuries)

Nowra 1 Jan 2024 - 23 Sep 2024

102 total injuries (inc 23 Cat D injuries)

The Gardens 1 Aug 2023 - 21 Sep 2024

478 total injuries (inc 79 Cat D injuries)

Wentworth Park 5 Jan 2024 - 21 Sep 2024

270 total injuries (inc 49 Cat D injuries)

TOTAL

1,242 total injuries (inc 258 Cat D injuries)

Comment: GRNSW is heavily promoting double-arm lures as a key safety initiative but 1,242 injuries and numerous deaths is an unacceptable toll on these few racetracks using the new lures.

Also note that racetracks in Victoria exclusively use double-arm lures. For the period 1 Jan - 24 Sep 2024, there have been a total of 2,460 injuries (including 434 Cat D injuries), with 36 on-track deaths (compared to 31 for the whole of 2023).

Submission responding to Terms of Reference

4.4 GRNSW fails to meet additional Operating Licence requirements

In addition to the racecourse functions mentioned above, CPG believes that GRNSW is failing to perform a number of the functions required under its Operating Licence.

CPG has provided evidence of these failures in this submission with many of the functions relating to the Principal Objective requiring GRNSW to *"exhibit a sense of social responsibility by having regard to the welfare of greyhounds"*.

In addition to these functions, CPG is aware that many recent allegations and revelations call into question GRNSW's ability to fulfil the other two Principal Objectives: *"be a commercially viable entity"*; and *"promote greyhound racing in the State as a competitive and sustainable industry with a high level of public trust"*.

TERM OF REFERENCE 4

RECOMMENDATION 4A. GRNSW must develop procedures for assessing and acting upon the findings of GWIC quarterly injury reports and publishing the outcomes of their assessment.

RECOMMENDATION 4B. NSW Government to establish an independent audit and review of the entire Greyhound Racing Capital Grant Program.

GRNSW to:

- implement recommendations of UTS research *"Identifying optimal greyhound race track design for canine safety and welfare"* including introduction of six dog races and the replacement of curved tracks with safe tracks.
- provide details of how the remaining funds from the \$30m taxpayer funded Greyhound Racing Capital Grants Program will ensure that all NSW racetracks meet minimum safety standards

RECOMMENDATION 4C. GRNSW to reveal the numbers of deaths and injuries that were forecast to occur after the introduction of double-arm lures.

RECOMMENDATION 4D. The NSW Government to arrange an independent audit to establish if GRNSW is meeting its obligations under its Operating Licence. Particular attention should be paid to the following requirement under 'Function 13. Future Sustainability of Greyhound Racing in NSW': *(f) The Licensee must not permit systemic corruption, integrity or animal welfare issues to develop or exist in the industry.*

Submission responding to Terms of Reference

In conclusion

This submission demonstrates that GRNSW has not and cannot meet its obligations under its Operating Licence or social licence.

In conclusion, as is so often the case when dealing with the greyhound racing industry, we are all reduced to discussing statistics and numbers and percentages. It is too easy to forget that at the heart of every number is a dog. A dog with a unique personality, a longing for the company of other dogs and people, and a desire to live.

The NSW greyhound racing publishes the names of very few of the dogs who die as part of their industry. Even where we do know the dogs' names, the only details we have about them is how they died.

As we have their names, we would like to take this opportunity to acknowledge the 70 dogs killed on NSW's lethal racing tracks in 2023, please see the next page.

Thank you for considering this submission by the Coalition for the Protection of Greyhounds.

REST IN PEACE

DOGS KILLED ON NSW TRACKS IN 2023

Our Boy Rocky, Refreshment, Handsome Alert, Peter Pan, Chicago Reign, Cupidity, Far From Shy, Lieutenant Dan, La Mirador, Keep It Short, Kingsbrae Flow, Mobile Doll May, Zoe's Charm, Winlock Lad, Hazel Intention, Mighty Sting, Jack Nelson, Full Of It, Almost Blue, Andante, Dusty Armatree, Zipping Moscow, Orson Laurie, Burn Out Bronte, Tahlee Girl, Cyclone Shirley, Joyous Treasure, Whipping Dance, Unchanged Pace, Swift Kade, Miss Indi, Ding Dong Ditch, Miss Apex, He's Hot Today, Bullet Blonde, Gillenbah Star, Classy Luna, Clover Energy, Reefton Vivi, La Folie, Greek Wanderer & Bianca's Son

GREYHOUNDS KILLED AFTER BEING REMOVED FROM NSW TRACKS WITH INJURIES AND THOSE KILLED DUE TO TRIALS

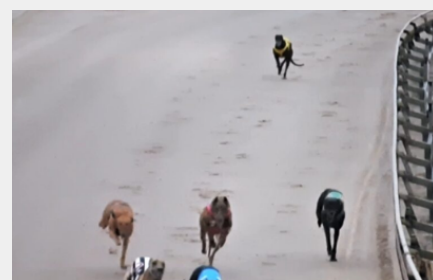
Fabizio, Farmor Uproar, Trixie Kade, Starlight Tina, Go Jack, High Banker, Gartholomew, Hidden Time, Westside Hitman, Safari Sticker, Sitting Duck, Out For Glory, Songar Holly, Despicable Lucy, Release The Rage, Nobby's Girl, Flying Express, Burnt Brother, Bokarm Arrow, Where's Kenny, Tarawi Indi, Awesome Fred, Burringbar Gypsy, Magic Charm, Invest Wisely, Roc Tycoon & Valour Rain



Bianca's Son crashed into the running rail at Wagga and fractured his skull on 15 Dec 2023. He was killed by the on-track vet. GRNSW edited Bianca Son's horrific crash out of the race video.



Full Of It is shown here after colliding with another dog and suffering a fractured foreleg. She was about to be killed by the on-track vet, two days short of her third birthday.



La Mirador fell at the first turn and suffered agonising compound fractures of both his forelegs. He was killed by the on-track vet on 22 Feb 2023. It was his third birthday.

Source: [Lethal Tracks 2023: NSW Edition](#)