



Animal Defenders Office

Using the law to protect animals

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Greyhound Welfare & Integrity Commission
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Dear Sir/Madam

Submission on the Draft NSW Greyhound Welfare Code of Practice

Thank you for the opportunity to provide a submission on the Draft NSW Greyhound Welfare Code of Practice (“the Code”).¹

About the Animal Defenders Office

The Animal Defenders Office (“ADO”) is a nationally accredited not-for-profit community legal centre that specialises in animal law. The ADO is run by volunteer lawyers and law students and other volunteer professionals. It offers information and representation for individuals and groups wishing to take legal action to protect animals. The ADO also produces information to raise community awareness about animal protection issues, and works to advance animal interests through law reform.

The ADO is a member of Community Legal Centres NSW Inc., the peak body representing community legal centres in New South Wales.

Further information about the ADO can be found at www.ado.org.au.

GENERAL COMMENTS

The treatment of greyhounds in the greyhound racing industry has rightly come under increased scrutiny in Australia in recent times. In 2016 the Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales, led by retired High Court judge the Hon Michael McHugh, revealed significant animal welfare problems that were inherent in the industry. Following McHugh’s report (“the McHugh Report”)², greyhound racing was banned in the Australian Capital Territory.³ The industry is, however, still legal in New South Wales.

¹ Available at: <https://www.gwic.nsw.gov.au/about/industry-consultation/public-consultation/draft-nsw-greyhound-welfare-code-of-practice>.

² *Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales. Report*, 16 June 2016, Michael McHugh AC QC, https://apo.org.au/sites/default/files/resource-files/2016-07/apo-nid65365_5.pdf.

³ *Animal Welfare Act 1992* (ACT), section 18A:

18A Greyhound racing

(1) A person commits an offence if the person—

- (a) conducts, or facilitates the conduct of, a greyhound race in the ACT; or
- (b) allows a greyhound kept by the person to take part in a greyhound race conducted in the ACT.

Maximum penalty: 100 penalty units, imprisonment for 1 year or both.

The ADO does not support the use of animals for racing, breeding or other commercial purposes. We have, however, considered the measures proposed in the Code for the purposes of the public consultation process, and to improve the welfare of the animals used in the industry while it remains legal.

Overall, we submit that measures proposed in the Code do not sufficiently address the core concerns of many in our community about the unjustifiable animal suffering inherent in the industry. Our comments are set out below.

PART 5: HOUSING AND ENVIRONMENT

Housing requirements for racing greyhounds

Standard 5.8 in the Code requires that 'Greyhounds must be housed in greyhound housing areas that meet the minimum size requirements outlined in Table 1'.

The minimum area for one (non-breeding) greyhound is 3.0m² (Table 1).

By any objective standard this is a small area in which to keep a dog long-term.

The ADO notes that this small minimum size requirement has not changed since at least 2011.⁴

The ADO also notes that the public consultation page for the Code states that the Code was identified 'as a key reform needed to drive long term improvements in animal welfare in the NSW greyhound racing industry'.⁵

The ADO therefore submits that reinstating housing size requirements that have in place for at least a decade does not represent an 'improvement' in animal welfare.

The ADO recommends that the minimum space requirement for racing dogs be increased.

Housing requirements for breeding greyhounds

The Code proposes that the minimum pen size for greyhounds registered for breeding be 3.5m².⁶

The Code also advises that participants:

- ... may delay compliance with Standard 5.8 of this Code, as far as it relates to construction:
- for up to ten years from the date that this Code comes into effect;⁷

⁴ The requirement under the current Code is 'Racing Kennel – Minimum size = 3 sq.m (e.g 2m x 1.5m)': clause 6.3, *Code of Practice for the Keeping of Greyhounds in Training*, GWIC, July 2018:, https://www.gwic.nsw.gov.au/_data/assets/pdf_file/0010/287821/Code-of-Practice-for-the-Keeping-of-Greyhounds-in-Training.pdf. This was the same size as in earlier codes—see for example the 2011 Code, clause 2.2; <https://www.thedogs.com.au/Uploads/Userfiles/CODE%20OF%20PRACTICE%20%20Greyhounds%20in%20Training%202011%20FINAL.pdf>.

⁵ <https://www.gwic.nsw.gov.au/about/industry-consultation/public-consultation/draft-nsw-greyhound-welfare-code-of-practice>.

⁶ Part 5: Housing and Environment, Standard 5.8, Table 1, p15.

⁷ Part 5: Housing and Environment, Advisory information, p17.

As the minimum standard size requirement has not changed since at least 2011 (3m²), the ADO assumes the proposed 10-year exemption applies to participants housing breeding greyhounds, for whom the new space requirement would be 3.5m².

A 10-year transition period is excessive. Any slight improvement in animal welfare that the proposed new space requirement may appear to give breeding greyhounds is completely undermined by such a lengthy transition period. The ADO submits that the proposed transition period is unacceptable and that no special transition period is required for this Standard.

The ADO recommends the 10-year transition period for compliance with Standard 5.8 be removed.

Housing requirements for non-racing greyhounds

The Code applies to all greyhounds kept by a greyhound racing industry participant, regardless of whether the greyhound is kept for the purposes of racing or breeding, or as a pet.⁸

The McHugh Report identified that the average racing career of a greyhound is 12 months, whereas a non-racing greyhound has a life expectancy of 12-15 years.⁹

Standard 5.8 in the Code requires that 'Greyhounds must be housed in greyhound housing areas that meet the minimum size requirements outlined in Table 1'.

The minimum area for a non-breeding greyhound is 3.0m² (Table 1). There is no separate space requirement for non-racing greyhounds.

Assuming a non-racing greyhound is kept by a participant for the dog's natural life, this would appear to indicate that the greyhound could be confined to a very small area for 12-15 years. Confining any dog in such cage-like conditions for their natural life is unacceptable from a welfare perspective.

In South Australia, the minimum space requirement for a day/spelling kennel for greyhounds not in race training is 4.8m² for the enclosure with an accessible yard of no less than 5m².¹⁰ This shows that there are opportunities to increase the total area requirement in NSW for non-racing greyhounds.

The ADO recommends that separate space requirements should be stipulated for non-racing, or retired, greyhounds in the industry. The space requirements should be more than those stipulated for racing dogs to provide for additional freedom of movement.

RACE STARTS

Part 8 of the Code deals with training, trialling and racing. The objective of the Part is:

To ensure that the welfare of greyhounds is protected in greyhound training, trialling and racing.

⁸ The Code 'applies to all greyhounds and greyhound racing industry participants required to be registered in NSW', p4. The Code defines **greyhound** as 'a greyhound kept by a greyhound racing industry participant', p28.

⁹ Op.cit, pp1-2.

¹⁰ Greyhound Racing South Australia, *The South Australian Greyhound Industry Animal Welfare Policy*, February 2016, p2, <https://sa.thedogs.com.au/Uploads/Animal%20Welfare%20Policy%20March%202016.pdf>.

This Part does not, however, cap the number of dogs per race. In effect this allows the standard eight dogs per race to continue. A recent study by the University of Technology in Sydney recommended that the number of starts per race be reduced from eight to six.¹¹ This is seen as a way to reduce track congestion which is a leading cause of injuries and deaths:

All the evidence reviewed to date confirms that the main cause of the Catastrophic and Major injuries is congestion i.e. traffic jam. Approximately 80% of all Catastrophic and Major injuries were caused by congestion and incidents such as checking, collision, galloping etc. ...

One of the main reasons for congestion and traffic jam zones is an excessive number of greyhounds per race.¹²

Other racing industries such as the UK and Ireland have moved to six greyhounds starting per race.¹³

The ADO submits that the Code, with its stated focus on welfare, is the appropriate place for this matter to be regulated.¹⁴

The ADO recommends that Part 8 of the Code be amended to cap race numbers at a maximum of six per race.

BREEDING

The McHugh Report states that:

In the greyhound industry, th[e] mass slaughter of young and older greyhounds bred for the purpose of greyhound racing, and which are subsequently destroyed either prior to being named or raced, or upon retirement from racing, is euphemistically called “wastage” or euthanasia.¹⁵

A key priority of the Code must be to ensure that the number of greyhounds born in the industry is reduced. Reducing ‘wastage’ must be a fundamental welfare objective of the industry if it is to retain any integrity in the general community.

Standards such as 4.5, which limits the number of litters a female greyhound can have to no more than two in any two-year period, implicitly support this objective.¹⁶

This policy objective must, however, be made explicit in the Code.

¹¹ University of Technology Sydney (UTS), ‘Identifying optimal greyhound track design for greyhound safety and welfare’, 5 June 2017,

<http://www.grnsw.com.au/uploads/GRNSW%20Phase%20I%20Report%20FINAL%2020170605.pdf>.

¹² Ibid, pp224, 229.

¹³ Ibid, p229.

¹⁴ The ADO notes the comment by Mr Terry O’Brien, Director, Office of Racing, Department of Customer Service NSW regarding the recommendation of reducing race starts from 8 to 6 that ‘It would be up to Greyhound Racing NSW to consider those recommendations and how they are adopted as part of its overall strategy.’ Portfolio Committee No 6 (Better Regulation and Innovation), Budget Estimates 16 March 2020, transcript, p17, <https://www.parliament.nsw.gov.au/lcdocs/transcripts/2340/Transcript%20-%2016%20March%202020%20-%20UNCORRECTED%20-%20PC%206%20-%20Better%20Regulation%20and%20Innovation%20-%20Further%20hearing.pdf>.

¹⁵ Op.cit, p1.

¹⁶ The Code, p12.

The ADO recommends that the objective in Part 4 of the Code dealing with greyhound breeding be amended to refer to the need to reduce the number of dogs born into the industry.

This policy objective would be assisted by other measures that could be introduced in the industry. For example, there is no fee to apply for a new greyhound breeding licence or a renewal of a breeding licence.¹⁷ Moreover, on 1 July 2019 the fee for litter registrations was reduced from \$150 to \$50 for no apparent reason.¹⁸

The ADO submits that imposing a breeding fee and reinstating the previous litter registration fee may function as disincentives and thereby help (at least indirectly) to reduce the number of greyhounds being bred in the industry.

REHOMING

Rehoming rates

In a recent quarterly report the Greyhound Welfare and Integrity Commission (“GWIC”) stated that 18 greyhounds were accepted for rehoming by the Greyhounds As Pets (“GAP”) program managed by Greyhound Racing NSW, out of 272 retired dogs and a further 150 who were put down during the quarter.¹⁹

This evidence strongly suggests that current industry rehoming rates fall considerably short of the number of retired greyhounds who need homes.

The industry seems to depend on private individuals and charities to find homes for unwanted greyhounds. This is unacceptable. The small number of greyhounds rehomed through the GAP program indicates that the program needs to be expanded in order to take more unwanted greyhounds. Participants should also be required to establish greyhound sanctuaries to ensure that unwanted greyhounds who cannot be otherwise rehomed have a place to which they can go. A percentage of prize money should be used to establish and maintain the sanctuaries.

Euthanising unwanted greyhounds

The McHugh Report states that:

...the evidence before the Commission indicates that at least 50% of those [greyhounds] whelped - and perhaps up to 70% or even more of them - were deliberately killed simply because they never were, or no longer were, capable of being competitive racing greyhounds.²⁰

¹⁷ GWIC, ‘New registration fees from 1 January 2020’, ‘Breeder’ (registration type): \$0;

<https://www.gwic.nsw.gov.au/regulatory/registration/registration-fees> and <https://www.gwic.nsw.gov.au/registration/registration/breeder-registration>.

¹⁸ The stated reason was due to the ‘recent introduction of online services’ which made ‘the processing of these transactions more efficient’, but there is no online service for litter registration. GWIC, ‘GWIC announces fee reduction’, [no date], <https://www.gwic.nsw.gov.au/news-and-updates/gwic-announces-fee-reduction>.

¹⁹ GWIC, ‘Greyhound retirement and end of life report. October – December 2019’, p3, https://www.gwic.nsw.gov.au/_data/assets/pdf_file/0011/290648/Retirement-and-End-of-Life-Report-Oct-Dec-2019_21022020.pdf.

²⁰ Op.cit, p1.

As a general principle, healthy greyhounds must not be killed simply because they are not useful to the industry and because it may be difficult to rehome them.

Part 9 of the Code deals with 'Retirement and Preparation for Rehoming'. Its objective is:

To optimise rehoming outcomes for greyhounds that are retired or otherwise unsuitable for racing.

Standard 9.13 of the Code states that:

Where a greyhound is not suffering from an intractable condition or injury that causes significant pain or discomfort or a marked reduction in quality of life, the owner must meet minimum rehoming standards as detailed in 9.6 before considering euthanasia. If the owner has complied with the minimum standards, has been unable to rehome the greyhound and intends to have it euthanised, they must notify the Commission of this intention at least 10 business days before the greyhound is euthanised.

The ADO submits that if a greyhound is not suffering from an intractable condition or injury that causes significant pain or discomfort or a marked reduction in quality of life, the greyhound should not be euthanised.

The ADO recommends that Standard 9.13 be removed from the Code as a way of reducing the unacceptably high wastage and euthanasia rates in the industry.

Euthanising injured greyhounds

Standard 9.12 of the Code states that:

A greyhound may be euthanised where a veterinarian certifies that the greyhound is suffering from an intractable condition or injury that causes significant pain or discomfort or a marked reduction in quality of life, such that it is inhumane or would otherwise compromise the welfare of the greyhound to delay euthanasia.

The ADO submits that Standard 9.12 would be strengthened if the alleged 'need' for euthanasia as the only humane option is certified by an **independent** veterinarian. This would militate against industry participants (such as trainers and industry veterinarians) deciding dogs injured at the track should be put down despite having injuries that are treatable. A common example is where dogs sustain injuries to the 'off hock' (ankle), which was the most frequently cited reason for euthanising racing greyhounds in Queensland in 2019.²¹

According to animal welfare advocates, in most cases these injuries are repairable.²²

Therefore, dogs should only be able to be deliberately killed due to a racing injury if an independent (non-industry) veterinarian certifies that the injury is not repairable. Costs associated with repairing the injury should not be a consideration in this decision.

The ADO recommends that Standard 9.12 be amended to require that an independent (non-industry) veterinarian certify that euthanasia is the only humane option for an injured greyhound because the injury is not treatable.

²¹ Rebeka Powell, 'Greyhound racing sees 64 deaths, more than 1,200 injuries on Queensland tracks, figures show', *ABC News*, 29 January 2020, <https://www.abc.net.au/news/2020-01-29/greyhound-racing-see-64-deaths-1200-injuries-on-qld-tracks/11903650>.

²² *Ibid.*

ENFORCEMENT

The Code states that:

Persons appointed as Inspectors under the Act [the *Greyhound Racing Act 2017*] will enforce the Standards contained in the Code on behalf of the Commission.²³

According to GWIC's latest Annual Report, there is one Chief Inspector and seven inspectors.²⁴

The ADO submits that this is not enough to ensure that all kennels and other facilities are inspected for compliance with the Code. The GWIC Annual Report states that kennel inspections 'are a key aspect of the Commission's welfare strategy'.²⁵

The ADO submits that more inspectors should be engaged to ensure compliance with the Code.

Detailed comments on particular aspects of the Code are provided in the Table below.

Table 1: DETAILED COMMENTS ON THE CODE

THE CODE	ADO COMMENTS
Part 2: Nutrition and Hydration	
Objective	
Page 7	<p><i>To ensure that every greyhound receives the food and water needed to provide for optimal development, health and wellbeing.</i></p> <ul style="list-style-type: none">• This is a welfare code of practice, not a training or racing code. The objective of this part of the Code should refer to the welfare and wellbeing of the dogs as its top priority.• The ADO recommends that the objective be reworded to put 'wellbeing' first, as the top priority of the Standards on nutrition and hydration.
Food	
Standard 2.1	<p><i>Food provided to puppies and greyhounds must be nutritionally balanced and complete, and of sufficient quantity and quality to meet the daily requirements of the greyhound, taking into account its physical and dental health, condition, age, size and level of activity.</i></p> <ul style="list-style-type: none">• This standard contains subjective criteria such as 'sufficient quantity and quality' and 'daily requirements of the greyhound'. How will they be enforced?• Minimum feeding frequency is only specified in the advisory information. This means it would be technically possible to comply with the food standards by leaving food to the point of becoming rancid before a new meal is provided. This obviously would have negative animal welfare consequences.• The ADO recommends that the minimum feeding guidelines in the Advisory Information (p7) be changed to a Standard.

²³ The Code, p5.

²⁴ *Annual Report. Greyhound Welfare & Integrity Commission. 2018/19*, p18, https://www.gwic.nsw.gov.au/_data/assets/pdf_file/0007/283381/Annual-Report_FNL.pdf.

²⁵ *Ibid*, p19. The Annual Report states that 747 first inspections were conducted in 2018/19 but does not state out of how many (p19). The ADO could not find this information in the Annual Report or on the GWIC website.

Cleaning and Food Storage	
Standard 2.4	<p><i>Food containers and food preparation areas must be kept clean and be disinfected regularly.</i></p> <ul style="list-style-type: none"> • What does 'regularly' mean in this Standard? How will it be interpreted by enforcement officers? • The ADO recommends guidance be provided to assist enforcement officers in interpreting 'regularly' in this Standard.
Water	
Standard 2.8	<p><i>Water containers must be cleaned regularly.</i></p> <ul style="list-style-type: none"> • What does 'regularly' mean in this Standard? How will it be interpreted by enforcement officers? • The ADO recommends guidance be provided to assist enforcement officers in interpreting 'regularly' in this Standard.
Part 3: Health and Wellbeing	
Dental health	
Standard 3.16	<p><i>Participants must monitor the dental health of all greyhounds in their care, and seek veterinary advice if the greyhound shows signs of dental disease.</i></p> <ul style="list-style-type: none"> • The ADO queries whether it is appropriate to require non-veterinary trained persons to monitor for signs of dental disease in greyhounds. • It is likely that dental disease would only be recognised by untrained persons when it is well advanced and already causing the animal pain. • The ADO recommends that consideration be given to requiring participants to ensure veterinarians inspect greyhounds' dental health annually, or within a shorter period.
Stress and anxiety	
Standard 3.19	<p><i>Participants must provide greyhounds in their care with opportunities for expression of normal canine behaviour, to prevent stress and anxiety.</i></p> <ul style="list-style-type: none"> • What is considered 'normal canine behaviours'? • The ADO recommends that guidance be provided as to what are 'normal canine behaviours', so that Standard 3.19 can be properly complied with and enforced.
Standard 3.20	<p><i>If a greyhound shows signs of stress, anxiety or stereotypies which do not resolve quickly, participants remove the trigger or cause, or seek veterinary advice.</i></p> <ul style="list-style-type: none"> • What is meant by 'quickly'? For example, does this refer to a timeframe of hours, days, or weeks? • The ADO recommends that guidance be provided as to what is meant by 'quickly', so that Standard 3.20 can be properly complied with and enforced.
Advisory information (p10)	<p><i>Participants should monitor their greyhounds to check if they are eating and drinking normally, able to defecate and urinate normally, able to move about freely and without pain, and their skin and coat are in a normal condition.</i></p> <ul style="list-style-type: none"> • Why is this advisory information not a standard? It seems a minimum care standard and more than just suggested information. • The ADO recommends that this guideline be made into an enforceable Standard.

Advisory information (p11)	<p><i>Participants should maintain good dental hygiene in their greyhounds. This can be achieved by routine teeth brushing, feeding of bones or dental treats, and use of chew toys.</i></p> <ul style="list-style-type: none"> • Why is the first sentence in this dot point not a standard? It seems a minimum care standard and more than just suggested information. • The ADO recommends that this guideline be made into an enforceable Standard.
Part 4: Greyhound Breeding	
Suitability for breeding	
Standard 4.4	<p><i>Neither male nor female greyhounds are to be registered for breeding before they are at least 18 months of age.</i></p> <ul style="list-style-type: none"> • This Standard is ambiguous. Does it mean the greyhounds can be used for breeding before this age, but not registered? • Is registration for breeding a legal requirement? If so, this should be noted in the Code.
Part 5: Housing and Environment	
Construction of housing pens, kennels and yards	
Standard 5.4	<p><i>Vehicles, caravans, portable crates and the crawl space under any dwelling must not be used as long-term housing for greyhounds.</i></p> <ul style="list-style-type: none"> • How long is considered to be 'long-term'? • The ADO recommends that this Standard be removed and these areas be prohibited from being used to house greyhounds.
Indoor housing	
Standard 5.5	<p><i>All indoor greyhound housing areas must have adequate ventilation.</i></p> <ul style="list-style-type: none"> • This Standard is unclear. • The ADO recommends that guidance be provided as to what is 'adequate' ventilation.
Greyhound housing area space requirements	
Standard 5.8 (Table 1)	<p>In NSW, the minimum area for two greyhounds is 6m².</p> <ul style="list-style-type: none"> • In Victoria, a minimum of 20m² is required if housing two greyhounds.²⁶ • The ADO recommends that the minimum space requirement for two (non-mating) greyhounds be increased to at least 20m² in line with minimum requirements in Victoria.
Housing greyhounds for breeding and whelping	
Standard 5.17	<p><i>Puppies from a litter must not be housed together unless they are all compatible.</i></p> <ul style="list-style-type: none"> • This standard is unclear. Does it refer to when the puppies are born/depend on their mother? Or after they are weaned?
Cleanliness and hygiene	
Standard 5.19	<p><i>Pens and kennels must be disinfected using an effective disinfectant no less than four times per year, ...</i></p> <ul style="list-style-type: none"> • What is an 'effective disinfectant'?
Part 6: Transporting Greyhounds	
Standards	
Standard 6.5	<p><i>Transport compartments may only be used for short-term housing whilst at race meetings or trials.</i></p> <ul style="list-style-type: none"> • It is not clear what is meant here by 'short-term'.

²⁶ Department of Economic Development, Jobs, Transport and Resources (Victoria), *Code of Practice for the Keeping of Racing Greyhounds*, April 2018, section 6.7.2 (minimum housing requirements), Table 2.

	<ul style="list-style-type: none"> • The ADO recommends that guidance be provided as to what is meant by ‘short-term’. • In Victoria, greyhounds must not be housed in airline crates for more than 24 hours.²⁷ <ul style="list-style-type: none"> ○ There is no similar requirement in NSW. ○ The ADO submits that 24 hours is too long and the maximum time in an airline crate should be significantly reduced in NSW. ○ The ADO suggests that consideration be given to the Code limiting the time greyhounds spend in airline crates to well below 24 hours.
Advisory information (p18)	<p><i>The temperature in transport compartments or cages should be no higher than 26°C. If the temperature is lower than 16°C, greyhounds should be provided with adequate protection against the cold.</i></p> <ul style="list-style-type: none"> • Why is this information not a standard? It seems a minimum care standard and more than just information. • The ADO recommends that this guideline be made into an enforceable Standard. • The ADO notes that the Victorian Code of Practice recommends the use of a rug or cooling jacket to protect against extremes of temperature during transport.²⁸ This and/or other guidance could be included in the NSW Code.
Part 7: Exercise, Socialism and Enrichment	
Standards	
Standard 7.2	<p><i>All puppies and greyhounds older than 8 weeks of age must be provided with regular contact with, and exposure to, other vaccinated dogs that are compatible.</i></p> <ul style="list-style-type: none"> • What is meant by ‘regular contact’? • The ADO recommends that guidance be provided as to what is meant by ‘regular contact’, so that Standard 7.2 can be properly complied with and enforced.
Exercise, socialisation and enrichment plan	
Standard 7.10	<p><i>Participants must have a written plan detailing how the Exercise, Socialisation and Enrichment standards in this Code will be met for each greyhound in their care.</i></p>
Advisory information (p21)	<p><i>Participants who keep more than one greyhound may have a single plan for all of the greyhounds in their care, provided that it meets the needs of all greyhounds.</i></p> <p><i>Participants are encouraged to check the Commission’s website for templates and materials around exercise, socialisation and enrichment plans. Contact details for the Commission are also available on the website.</i></p> <ul style="list-style-type: none"> • The ADO queries whether a single plan would be enough to provide for multiple greyhounds, given that each greyhound will have individual needs, temperament, characteristics etc. Will the plan be required to name each greyhound and list their particular details?

²⁷ Ibid, section 4.4 (Greyhound transport vehicle).

²⁸ Ibid.

	<ul style="list-style-type: none"> Further information about where the template plans are on the Commission's website should be provided (they could not be located at time of writing this submission).
Part 9: Retirement and Preparation for Rehoming	
Preparing greyhounds for rehoming	
Standard 9.2	<p><i>A greyhound that has ceased racing or training for racing must be provided with a 'wind down' period of at least 30 days before being rehomed.</i></p> <ul style="list-style-type: none"> In Victoria, the wind down period extends to 7 weeks.²⁹ Why is the NSW wind down period only 30 days? <p><i>During this wind down period, the owner must ensure that: ... the greyhound is moved to different housing.</i></p> <ul style="list-style-type: none"> The Victorian Code states during the wind down period greyhounds 'must be transitioned to housing of at least 15 sqm'.³⁰ The ADO recommends that the Code require minimum housing of 15m² for greyhounds during the wind down period.
Requirements for rehoming of greyhounds	
Standard 9.8	<p><i>Participants rehoming a greyhound as a companion animal must provide the new owner with a written statement detailing the following: [etc].</i></p> <ul style="list-style-type: none"> Consideration could be given as to whether participants should be required to provide a statement in writing about the dog's temperament, including whether the dog may have tendencies that could put the dog at risk of being declared menacing or dangerous when released to the community. The tendencies could include some of those outlined in the 'Advisory information' on page 26 of the Code. The point of this would be to ensure the new keeper or foster carer is aware and prepared. It should not be permitted to use this as a reason for not rehoming the dog.
Euthanasia	
Standard 9.12	<p><i>A greyhound may be euthanised where a veterinarian certifies that the greyhound is suffering from an intractable condition or injury that causes significant pain or discomfort or a marked reduction in quality of life, such that it is inhumane or would otherwise compromise the welfare of the greyhound to delay euthanasia.</i></p> <ul style="list-style-type: none"> Standard 9.12 is identified as an 'offence provision' for the purposes of s39 of the <i>Greyhound Racing Act 2017</i> (NSW).³¹ What exactly is the offence that can be committed? Euthanising a greyhound in circumstances other than those specified in Standard 9.12? The ADO recommends that Standard 9.12 be re-worded in mandatory language so that it is easier to identify the offence that can be committed.
Part 10: Definitions	
Is there a reason why 'sire' is not defined?	

²⁹ Department of Economic Development, Jobs, Transport and Resources (Victoria), *Code of Practice for the Keeping of Racing Greyhounds*, April 2018, section 6.5.

³⁰ Ibid.

³¹ The Code, p6.

Conclusion

The ADO submits that the Code requires significant amendment along the lines recommended in this submission if it is to achieve its aim of reducing the negative welfare consequences for all dogs involved in the NSW greyhound racing industry.

Thank you for taking our submission into consideration.

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The Animal Defenders Office acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present.

13 April 2020