



**CUSTOMS LEGISLATION AMENDMENT
(COMMERCIAL GREYHOUND EXPORT
AND IMPORT PROHIBITION) BILL 2021**

AN ANIMAL LIBERATION SUBMISSION




Acknowledgement of country

We acknowledge the Traditional Owners of country throughout Australia.

We acknowledge that this document was prepared on land stolen from and never ceded by the Gadigal People.

We pay our respects to their Elders, past, present and emerging.



"We don't have a duty to **speak** for the animals;
we have an obligation to be **heard** for the animals"
- Matt Ball

DOCUMENT DETAILS

Animal Liberation. 2023. Senate Standing Committee on Rural and Regional Affairs and Transport - Customs Legislation Amendment (Commercial Greyhound Export and Import Prohibition) Bill 2021.

Prepared by Lisa J Ryan and Alex Vince.

ABOUT ANIMAL LIBERATION

Animal Liberation has worked to permanently improve the lives of all animals for over four decades. We are proud to be Australia's longest-serving animal rights organisation. During this time, we have accumulated considerable experience and knowledge relating to issues of animal welfare and animal protection in this country. We have witnessed the growing popular sentiment towards the welfare of animals, combined with a diminishing level of public confidence in current attempts, legislative or otherwise, to protect animals from egregious, undue, or unnecessary harm. Our mission is to permanently improve the lives of all animals through education, action, and outreach.

INTELLECTUAL PROPERTY RIGHTS

© Animal Liberation 2023



Unless otherwise noted, copyright and any other intellectual property rights in this publication are owned by Animal Liberation. All material in this publication is licensed under a Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International Licence. Creative Commons Attribution 4.0 International Licence is a standard form licence agreement that allows you to copy, redistribute, remix, transmit and adapt this publication provided you attribute the work, you do not use it commercially and you distribute your contribution under this creative commons licence. The licence terms are available via creativecommons.org/licenses/by-nc-sa/4.0/.

CONTACT & ENQUIRIES

Lisa Ryan, Regional Campaigns Manager
Alex Vince, Campaign Director

Animal Liberation
Suite 378
846-850 Military Road
Mosman NSW 2088

Web: www.al.org.au
Email: lisa.r@animal-lib.org.au
Phone: (02) 9262 3221

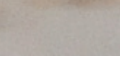
Cover photo courtesy of Jo-Anne McArthur / We Animals

ACKNOWLEDGEMENT

Animal Liberation acknowledges the collaborative efforts of other like-minded organisations and individuals, and the significant contributions made in particular by the Coalition for the Protection of Greyhounds ('CPG'), and numerous greyhound rescue and re-homing groups and advocates, in Australia and around the world. We will continue to work collaboratively and effectively together towards meaningful reforms, progressive Government policy direction and meaningful legislation, to protect the welfare and wellbeing of all greyhounds in the greyhound racing industry, including those overbred, injured, killed, traded and discarded by the greyhound racing industry.

We also wish to acknowledge all these gentle, sensitive and loyal greyhounds as individual, unique and sentient beings, who ongoing, have suffered extreme cruelty and frequently death, discarded to unknown fates as a result of the appalling lack of regulation with Australia's greyhound exports.

We would like to dedicate this submission to 'Brooklyn' a NSW greyhound born in 2008 and who after failing as a 'racer', was exported to China in 2010 and the Yat Yuen Canidrome, where no dog had ever made it out alive. 'Brooklyn' became a rallying cry for the efforts to end greyhound racing around the world. After global public pressure, the Canidrome was closed in 2018. More than five hundred greyhounds went to waiting adopters around the world and 'Brooklyn' found his first ever loving home in Boston in the US with Carey Theil and Christine Dorchak.



16 August 2023



Committee Secretary

Senate Standing Committee on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
CANBERRA ACT 2600

Via email: rrat.sen@aph.gov.au.

We present this submission on behalf of Animal Liberation.

Animal Liberation is grateful for this opportunity to respond to and provide informed and considered commentary to the Senate Standing Committee on Rural and Regional Affairs and Transport, during its consideration and reporting on the Customs Legislation Amendment (Commercial Greyhound Export and Import Prohibition) Bill 2021.

Animal Liberation is strongly opposed to the greyhound racing industry and all such activities which seek to exploit animals for spectator sports, human entertainment, commercial purposes, and in this case, the gambling industry.

We are very familiar with the turbulent and frequently abhorrent history of greyhound racing across Australia and globally, and our submission has endeavoured to objectively balance this history with due consideration of the Federal Government's endeavours and actions to introduce meaningful reforms. We have reflected with much sadness and disappointment the numerous industry exposures, investigations, public funded inquiries; and subsequent findings, reports and recommendations resulting in limited 'reactive' government and industry reforms, which have not translated into meaningful or substantive improved greyhound animal welfare, and/or heightened integrity within the Australian greyhound racing industry.

Where warranted, our submission also includes relevant comments and recommendations for the Committee's consideration where we believe further improvements can be achieved or facilitated. Animal Liberation holds the view that greyhound racing will be permanently outlawed in Australia in the not-too-distant future, and that this development will be a matter of when, rather than if, as has continued to occur around the world.

We have endeavoured to include objective and reflective responses and commentary in response to the Bill, in addition to consideration of contemporary public views and expectations, founded on critical and evidenced-based thinking.

While Animal Liberation will continue our active greyhound campaign to shut down greyhound racing in Australia, during the interim period, the welfare of all individual exported Australian greyhounds must also be protected. It is our strong view that the only effective and meaningful way to protect Australian greyhounds from ending up in inhumane conditions which do not meet Australia's animal

welfare standards, or public expectations, is federal legislation to ban the export of all Australian greyhounds for commercial purposes.

We contend Australian governments and the industry bodies have been given more than sufficient time to proactively regulate their industry and their participants, and have repeatedly failed to do so, or protect the welfare and wellbeing of greyhounds.

We thank the Committee Members for their objective consideration of Animal Liberation's submission.

Lisa J Ryan

Regional Campaigns Manager

Alex Vince

Campaign Director

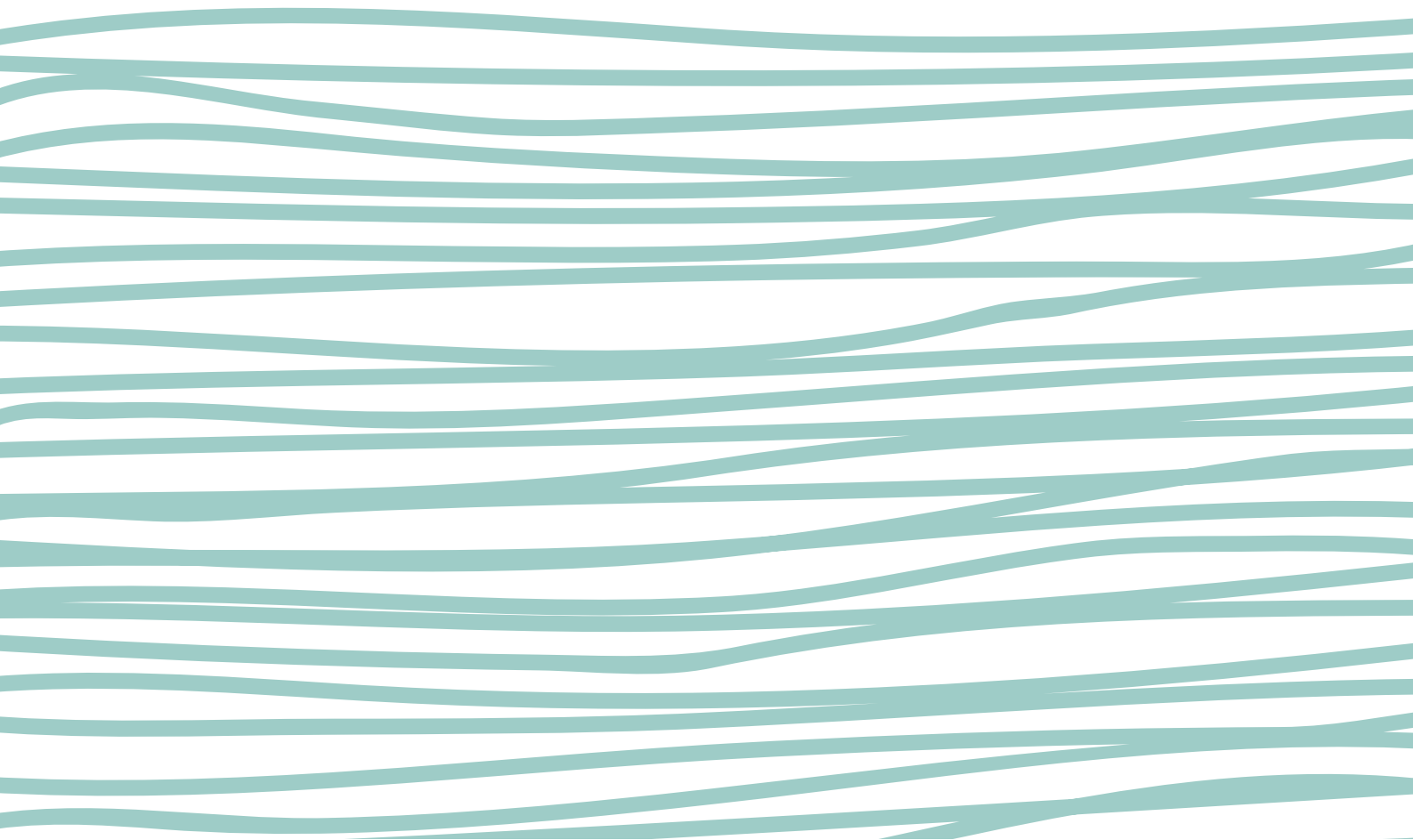


**THE CULTURE OF THE INDUSTRY
IS DEFINED BY ANIMAL DEATHS
BEING ACCEPTABLE
AND NECESSARY**

AND WHERE PROFITS COME BEFORE WELFARE

SECTION ONE

FOREWORD AND PREAMBLE



SECTION ONE

FOREWORD

The Greyhound Racing Industry has never been, and will never be, a safe environment for greyhounds. The Industry was founded on, and is still reliant on, the use and exploitation of greyhounds who are forced to race at excessive speeds, often on unsafe tracks, for gambling profits and entertainment purposes. The inherent, systemic and industry-wide issues which exist across Australia, are similarly evident around the world with similar levels of animal cruelty and exploitation suffered by these intelligent, social and affectionate dogs.

The history of greyhound racing in Australia provides a sobering reminder of a deeply entrenched culture and issues involving animal cruelty, gambling, secrecy, and the government's refusal to comprehensively address these issues. This, coupled with the increasingly obvious and persistent lack of sustainability means that the greyhound racing industry has lost its social licence, and no longer enjoys the support of the broad community.

It is Animal Liberation's firm view that the greyhound racing industry and those who participate and profit from the exploitation of greyhounds through racing and breeding for racing, continue to commodify sentient beings as commercial objects, and the individual greyhounds continue to pay the ultimate price. Their "welfare" is sacrificed. Greyhounds continue to suffer and die or are deliberately killed under the misleading guise of "euthanasia", while others are 'traded' or simply disappear. The greyhound Industry has still not accepted its culpability, responsibility and accountability to the level expected by the public.

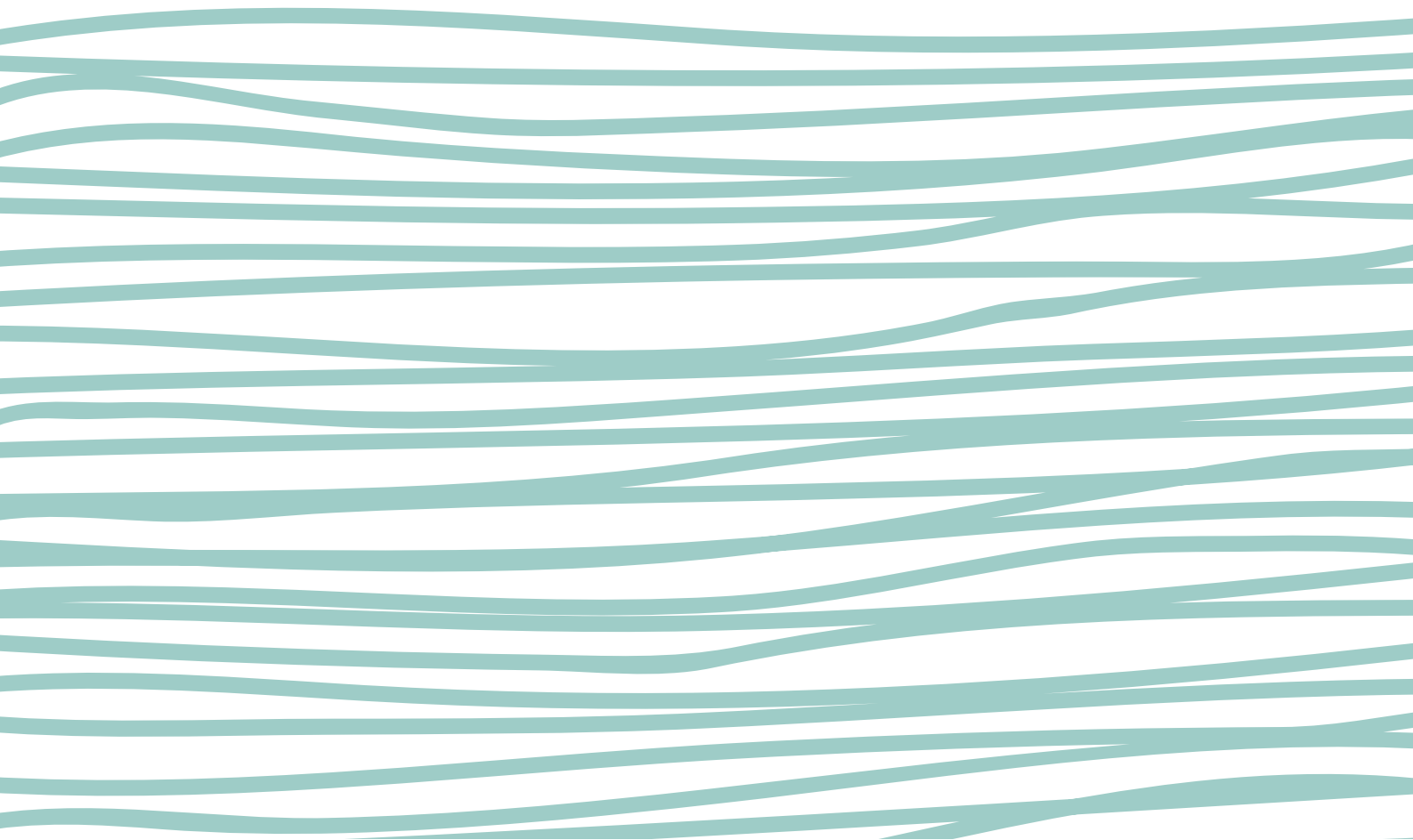
Animal Liberation strongly contends that the oversight, management and enforcement of all animal welfare laws and standards is the responsibility of the government, rather than member-based industry bodies where inherent commercial interests and conflicts of interest are evident and take priority.

Accordingly, Animal Liberation fully supports the objectives of the *Customs Legislation Amendment (Commercial Greyhound Export and Import Prohibition) Bill 2021* ('the Bill') and strongly encourages the Senate to support and pass this long overdue legislation.



SECTION TWO

BACKGROUND AND HISTORY



SECTION TWO

BACKGROUND AND HISTORY

- 2.1 Animal Liberation's views and informed conclusions about the greyhound racing industry, and the export of Australian greyhounds, and our strong support for the objectives of the Bill are all closely intertwined. We maintain that many of the issues associated with the export of Australian greyhounds emanate from the ongoing failings by the greyhound racing industry, and successive governments.
- 2.2 Addressing one issue effectively requires consideration of a range of issues so that we can apply a holistic rather than an isolated approach when reviewing such matters based on the clear objective of meaningful and progressive reform and solutions, rather than more band aid solutions.
- 2.3 For the above reasons, we believe it would be remiss of Animal Liberation, not to reflect on the related industry wide issues which continue to fester and remain largely unaddressed.
- 2.4 Australia is one of only seven countries in the world where commercial greyhound racing is still legally practised. Australia accounts for over half of the worldwide gambling revenue from greyhound racing, and currently has 57 active commercial tracks, with 27 located in NSW. Globally, another 47 tracks are operating across the United Kingdom, Ireland, United States and Mexico.
- 2.5 Australia is generally a nation of animal lovers, and a 2022 survey orchestrated by GREY2K US Worldwide and the Coalition for the Protection of Greyhounds confirmed, 57% of Australians want greyhound racing to be phased out or banned; and 69% oppose governments subsidising the greyhound racing industry with taxpayer dollars. The Australian public expects the government to regulate and enforce animal welfare protections, rather than allowing self-regulated member bodies with inherent commercial conflicts of interest to oversee animal welfare and protection.
- 2.6 Currently, Australian greyhound racing participants can legally export greyhounds to many overseas destinations for racing, breeding and other commercial purposes; with greyhounds frequently at increased risk of abhorrent animal cruelty, neglect, abuse and even death.
- 2.7 The history and evidenced facts clearly demonstrate, the commercially driven greyhound export trade has resulted in, and continues to result in, abhorrent greyhound suffering and the premature death of hundreds of Australian greyhounds. These facts cannot be disputed.

CURRENT LEGISLATION

- 2.8 For many years, Australia held the distinction of being the largest exporter of greyhounds globally, knowingly sending dogs to endure poor welfare outcomes in foreign countries. Shockingly, it was reported that approximately 20,000 Australian greyhounds were dispatched to Macau, where they were confined in concrete cells and ultimately killed when they failed to achieve success in races, with 99% of the Macau greyhounds originating from Australia.

- 2.9 In 2004, Greyhounds Australasia ('GA') introduced a 'passport system' to regulate exports, but its enforcement was rendered ineffective as the government refused to formalise the restriction. Consequently, even after Macau was blacklisted, 590 greyhounds were still exported there in the two years that followed. This allowed Macau, along with other jurisdictions like China, Vietnam, and South Korea, to function as 'dumping grounds' for 'slow' Australian greyhounds, who were sentenced to an unknown and cruel fate.
- 2.10 The current ineffective Australian animal welfare legislation and rules that regulate greyhound exports means, Australian greyhounds can be exported to an often-unknown fate, including subsequent further export to other greyhound export markets and destinations, with low or no animal welfare protection. Once a greyhound leaves Australian shores as part of the commercial global greyhound export and trade, they face an increased serious risk of compromised animal welfare and wellbeing – losing what little prior Australian animal welfare protections they previously had.
- 2.11 The global greyhound export market is financially lucrative, largely unregulated and unaccountable, placing commercial profits and the gambling industry ahead of the welfare and wellbeing of individual, unique and sentient greyhounds. In addition to the profits derived by individual Australian greyhound racing participants', other stakeholders capitalise and financially benefit from greyhound exports, including; road and air animal transport companies, boarding kennels, and some veterinary practitioners involved with animal exports. When it comes to animals and commercial profits, the gravy train is always extensive.
- 2.12 In spite of the Australian national member body, GA introducing an Australian greyhound 'passport' in 2004 and blacklisting China as an export destination in 2016, data from the Australian Federal Government's Department of Agriculture, Fisheries and Forestry confirms, Australian greyhounds are still being sent to China and other unsuitable destinations. 23 Australian greyhounds have been exported to Hong Kong and China between January 2016 and May 2023.
- 2.13 While the industry organisation GA is able to respond to charges by issuing suspensions and disqualifications, as is GWIC in relation to NSW participants, as there are currently no laws restricting the export of greyhounds, it isn't possible to criminally charge such individuals. The animals themselves, these gentle dogs of course also lose all protections previously enjoyed in Australia, completely inadequate as they are, when they are exported.
- 2.14 The notorious greyhound racing venue in Macau, known as the Canidrome, took up to 30 Australian greyhounds a month – discarded by Australian participants as they were considered too slow for Australian racetracks. Dogs were forced to race regularly on a track which was too hard, frequently causing greyhound injuries. The racetrack housed up to 800 dogs and on average one would be killed every day. Dogs would regularly be killed for being too slow, with no effective rehoming programme for dogs which were unwanted. While the Canidrome has since been closed, the same low animal welfare standards apply in Mainland China and the underground racing industry in China which makes it difficult to verify the conditions that greyhounds are kept in China.
- 2.15 In 2017 western Sydney-based brothers Mark and Steven Farrugia and other Greyhound Racing NSW (GRNSW) participants were found guilty of a total of 464 charges under the Greyhound Industry's racing rules, as part of a then GRNSW inquiry into the unauthorised sale of animals into Macau, China, Vietnam and Dubai.

- 2.16 The revelations followed an investigation which revealed that dozens of Australian greyhounds were being sent to a Shanghai wild animal tourist park where they were forced to race against cheetahs.
- 2.17 Previously, in June 2016, the GRNSW exports inquiry saw 179 registered trainers and owners charged with breaching industry regulations. At least 544 greyhounds were identified as having vanished overseas without appropriate paperwork, 408 of which were NSW-registered animals. It emerged that the vast majority of the 179 people charged had earlier offloaded those dogs to either the Farrugia brothers at Marsden Park, or the Calga-based Cauchi family, for an average \$500 per hound – no questions asked. The animals were then transported by a pet freighting firm to Macau, China, Vietnam and Dubai where they fetched \$1000 or more.
- 2.18 In December 2016, two months after NSW Premier Mike Baird's spectacular greyhound ban backflip – Mark Farrugia, Steve Farrugia and his wife Donna were each hit with 98 charges relating to unauthorised exports plus multiple other offences such as failing to obtain greyhound passports, failing to lodge prescribed transfer of ownership forms following the sale or disposal of greyhounds, attempts or conspires with another person to commit a breach of the rules, bringing the sport into disrepute and acting in a manner that was negligent, dishonest, corrupt, fraudulent or improper, or constitutes misconduct.
- 2.19 While the export of greyhounds from Australia to Macau was banned in 2013 due to its lack of animal welfare laws, this ban did not however stop Greyhound owners and trainers exporting them there for profit. Earlier, in December 2015, investigations uncovered about 700 dogs locked inside the notorious, dilapidated Canidrome racetrack, where they were crammed into tiny cells and routinely killed to make way for fresh arrivals. Australian dogs were forced to race around the clock at the Canidrome, regularly sustaining injuries, with a disturbing 100 per cent euthanasia rate. These Australian greyhounds were flown to Hong Kong and then ferried to Macau, where they were locked inside the Canidrome facility.
- 2.20 No-one who viewed the ABC's 7:30 Report in December 2016 exposing the 'Slow' Australian greyhounds being exported to Macau, China to go on 'death row' could be in any doubt about the inherent greed and wanton disregard for the welfare of animals as demonstrated by the Farrugia brothers, and other GRNSW participants. This ABC report also exposed the failures of the Australian greyhound industry and government.
- 2.21 While GA prohibits the export of greyhounds to China, it can only enforce the prohibitions by issuing fines and racing bans to industry participants who are discovered to have breached the organisation's bans. The industry organisation is able to respond to these charges by issuing suspensions and disqualifications, however, as there are currently no laws restricting the export of greyhounds, it is not possible to criminally charge such individuals.
- 2.22 While Qantas, Cathay Pacific and Air New Zealand now refuse to transport racing greyhounds, other airlines such as Thai airlines and Singapore airlines do not have a policy of refusing to transport greyhounds. While these transport options remain, Australian greyhound participants will continue to exploit greyhound export options.
- 2.23 Though Australian greyhound export numbers have reduced, Australian greyhounds are still exported for racing and breeding as a legally allowed practice, and the ongoing greyhound export trade continues to pose significant and unacceptable risks and impacts for Australian greyhounds. Australian greyhound racing participants have continued to traffic

- 2.23 greyhounds by circumventing racing industry processes, exporting without seeking a GA passport, or sending dogs first to countries that are considered 'safe' by the industry, such as England, before having them rerouted elsewhere.
- 2.24 Between 2016 and 2022, 1,528 greyhounds were exported overseas from Australia. Even with the introduction of an effective mechanism to prevent greyhounds being exported directly to those countries with poorer or no animal welfare standards and monitoring, there is a high risk that greyhounds can still be exported to those countries indirectly.
- 2.26 In 2017 GA temporarily suspended exports of greyhounds to the US after information was revealed that suggested that dogs from Australian origin were ending up in China after being exported to the US.
- 2.27 Recent examples include the greyhounds Canya Cruise (WA origin) and Turbo Thomas (NSW origin). The 4-year-old greyhound Turbo Thomas was sold by GRNSW participant Trent Anderson to Victorian trainer disqualified Vice Tullio and then again re-sold to another Victoria trainer Damien Senn. Turbo Thomas was transferred from NSW to Victoria and then exported to China from Melbourne. This was after Turbo Thomas had earned Anderson around \$55,000 and yet he sold it off like a spare car part.
- 2.28 Shockingly, while both Canya Cruise and Turbo Thomas were exported as "companion animals", they are now both reportedly listed on a Chinese dog breeding website. These examples demonstrate yet again that the Australian greyhound racing industry is unable to control the appalling behaviour of its own industry participants.



Image: Owner Trent Anderson with 'Turbo Thomas' after extending his winning streak to 17 at Ladbrokes Gardens on Friday, setting a new Australasian record for consecutive TAB wins.

Source: *Greyhound Recorder*, 11 January 2020.

- 2.29 One of the most damning accounts of the distressing historical facts surrounding the export of Australian greyhounds is detailed in the 2020, 'Australian greyhound exports – going, going, gone?' by Jeff White, International Reporter, Coalition for the Protection of Greyhounds. This article should be mandatory reading for all Committee members.

2.30

Critically, Mr White's article says in relation to the "passport" system for dogs:

2.30.1 *"The racing industry itself, represented by the umbrella organisation Greyhounds Australasia ('GA'), has had an export 'passport' system in place since July 2004. Participants are required by the industry's own rules of racing to apply for and obtain a passport (really just a kind of permit) and a 'certified pedigree' from GA for each greyhound they intend to export. The initial purpose of the passport scheme was to provide the industry with statistical oversight and tracking of greyhound exports, and the reasons for export as stated by the applicant. The prospective welfare of the greyhound itself was not a priority".*

2.30.2 *"In September 2005 GA developed a National Animal Welfare Policy for the domestic Australian racing industry, but it was not until seven years later, in 2012, that GA established its Required Standards for Countries Seeking to Import Australian Greyhounds (the 'Required Standards'). This, for the first time, set minimum standards for the welfare of exported racing greyhounds in their destination countries. Those standards formed the basis of a review by GA of welfare standards in several dog racing countries, which was concluded in December, 2012. The idea was to develop welfare-based criteria for the issuance of greyhound passports".*

2.30.3 *"That review was done largely by sending self-reporting questionnaires to racing control bodies in seven 'key export jurisdictions' where 'regulated' (i.e. commercial) greyhound racing took place (the UK, Ireland, the USA, the Czech Republic, Vietnam, Macau, and New Zealand). Other export destinations where greyhound racing was known or believed to take place on an 'unregulated' basis (such as China, Japan, United Arab Emirates, and South Africa) were not assessed in this manner; GA decided instead that passports would not be issued thereafter for exporting dogs to any such countries except on a case-by-case basis, in which the onus was on the exporter to satisfy GA that the dog would be well cared for at its destination country. This effectively halted the issuance of GA passports to those countries, except for greyhounds intended to be kept as pets".*

2.30.4 *"Although GA's review of welfare standards described above was completed in 2012, it was not made public until June 2014, after repeated demands to do so by the late John Kaye MLC of New South Wales. Kaye was the deputy chair of the select committee of the Legislative Council on greyhound racing in the state, which has been by far the largest source of greyhounds exported from Australia. He understood, as few did at the time, why regulatory bodies tolerated exports and failed to enforce their own passport rules".*

2.31

The lack of animal welfare protections in China has long been a concern including allegations about an underground racing industry, and credible reports of greyhounds forced to race Cheetahs in a Shanghai wildlife park, and dogs being supplied to the dog meat trade.

- 2.32 In spite of the 2004, GA ‘passport’ system for greyhound exports, the financially lucrative trade in discarded Australian greyhounds remains legal, and successive governments and industry bodies failed to take meaningful action.

ANIMAL WELFARE

- 2.33 Animal welfare legislation is the central tool used to define, penalise and deter acts of animal cruelty. Worldwide, they have existed for centuries. Though they ostensibly apply to animals included within their definitions, their application can depend upon a range or combination of clauses, auxiliary laws or subordinate instruments, and the policies of their empowered authorities. Such laws have been enacted in each Australian State and Territory. Their specific object and purpose is the prevention of cruelty to animals and/or the promotion of their welfare. Though law and jurisprudence concerning the protection of animals is varied, controversial and often contradictory, this reflects current attitudes towards their treatment and animals more generally; our attitudes towards animals is as complex and varied as the laws crafted to facilitate their protection.
- 2.34 Australia’s animal protection legislation and its associated mechanisms have been widely criticised. Some have focused on the presence of exemptions or defences contained within Acts which “legalise considerable cruelty” in certain contexts or for certain purposes. Others argue that tougher sentencing for cruelty offences is needed. Some maintain that structural examples of bias and conflicts of interest are of paramount concern or that the current deficiencies require the establishment of a robust national framework. Others still have targeted the current legal status of most animals as items of property as the underlying problem from which many others arise.
- 2.35 Many of these criticisms have been expressed elsewhere in the Western world, indicating that the perceived problems are more generalised and widespread than the Australian experience. Within this complex, there are a range of competing viewpoints which culminate in different conclusions and solutions. This is significantly amplified by the fact that animal law is a relatively new field in Australia and there is a comparative lack of research into its application.

ANIMAL WELFARE AND GREYHOUND RACING

DEATHS AND INJURIES

- 2.36 The Coalition for the Protection of Greyhounds (‘CPG’) recorded 202 greyhounds as being killed and 9,861 greyhound injuries on Australian tracks in 2020. These figures increased in 2021 to 213 greyhounds killed and 10,195 injuries on Australian tracks, including 64 track deaths and 3,074 track injuries in NSW alone. An additional twenty-eight (28) greyhounds were euthanised in NSW after sustaining injuries off the track. Across Australia, 44,403 documented injuries were recorded from 2016 through 2022. CPG analysis of Australian stewards reports found that between 2020 and 2022, a total of 30,648 injuries were recorded at Australian tracks. However, the suffering endured by greyhounds extends far beyond the race tracks themselves.

OVERBREEDING AND 'WASTAGE'

- 2.37 Thousands of greyhounds are bred each year without ever participating in races and are deemed unwanted and expendable, leading to their deaths and disposal. The primary welfare concerns relating to 'wastage' revolve around two (2) groups of dogs: 1) dogs bred specifically for racing but never participate on the race track and 2) dogs retired from racing. An internal memo from GA's CEO states that between 13,000 and 17,000 healthy greyhounds are killed each year.
- 2.38 The Special Commission of Inquiry in NSW put forward various proposals, one of which included a bond scheme, to approach the problem of overbreeding in the greyhound racing industry.
- 2.39 In 2020, the industry adoption program Greyhounds as Pets ('GAP') successfully placed around 2,000 dogs nationwide. However, the breeding rate during the same period amounted to approximately 12,000, which means the current breeding rate is six (6) times higher than the industry's capacity to find homes for these dogs.
- 2.40 It is reasonable to conclude that the market for the use of greyhounds in research, for teaching in veterinary schools, and as a live export 'commodity' has arisen as a result of the persistent issue of excessive breeding. Currently, a large percentage of all breeding is done by surgical insemination of frozen semen.
- 2.41 The ongoing over breeding and wastage within the greyhound racing industry continues unabated, in the hope of the impossible and unlikely quest to breed and own the fastest and most enduring greyhound, which will not succumb to serious injury or death being trialled, raced or over-raced.
- 2.42 We contend that the industry has intentionally ignored the mass over breeding and continues to scramble with the serious results, quite oblivious, even unconcerned with the results and consequences now playing out with the cost-of-living crisis, and challenges that many face with secure and affordable pet friendly housing, and those who may be homeless or at risk of being homeless. Council pounds and shelters are overstretched and the pressure on volunteer, self-funded rescue and rehoming organisations is unprecedented.
- 2.43 Rather than recognise and address these issues, GRNSW in particular is simply moving the deckchairs on the Titanic, using the current crisis as a PR exercise to establish external relationships where they can export NSW greyhounds overseas, under the banner of their international pilot program to the US, and appear to be doing the greyhounds and new adopters a favour. While we are not questioning the quality of homes in the US, these new GRNSW partnerships allow GRNSW to rid their industry of excess greyhounds whilst appearing to be 'humanitarians' without actually addressing the over breeding or holding their own participants to account with responsible and ethical rehoming, in spite of the large number of financial incentives on offer to do so. This scheme has been developed simply to manipulate how the NSW Industry achieves its rehoming targets.
- 2.44 While Animal Liberation fully supports the concept and practice of ethical and meaningful animal life-saving as opposed to life-taking, we have serious concerns about the operation and performance of GRNSW's industry managed Greyhounds as Pets (GAP NSW) programme. Our concerns are compounded by the actual performance and results achieved by GAP NSW, and the ever present, unavoidable conflicts of interest between GAP NSW and GRNSW's commercial interests.

LIVE BAITING

- 2.45 The use of small animals as live bait to train greyhounds for racing has garnered significant public attention in several countries, including extensive coverage in Australia. Shocking footage from properties across multiple Australian states revealed rabbits, piglets, and possums being torn apart and fed alive to starving greyhounds. A recent exposé by GREY2K USA Worldwide also exposed live lure training continuing in the United States and being a standard practice in the industry. This investigation led to the introduction of the first federal bill in American history to ban commercial dog racing, known as the Greyhound Protection Act, which is currently pending in Congress. The proposed legislation also prohibits American gamblers from betting on foreign races and, like the Bill currently under consideration, restricts the export of greyhounds for racing outside the country's borders.

OTHER WELFARE IMPACTS

- 2.46 Despite the figures presented above, even the greyhounds who survive breeding and selection are isolated and confined in small cages for extended periods, often deprived of proper veterinary care, subjected to harsh training practices, and commonly drugged to manipulate race outcomes. In NSW, greyhounds have tested positive for a range of illicit drugs, including amphetamine and codeine. Between 2015 and April 2018, a total of 201 greyhounds tested positive for drugs in NSW.
- 2.47 Animal Liberation's tracking of the NSW greyhound Industry's Final Disciplinary Action Decisions reveal a stark picture confirming the Industry's deep-rooted culture, incapable and unwilling to reform. The following image depicts findings for the 1 January to 30 June 2023 period.

In just 6 months, 57 greyhound racing NSW participants have faced serious charges from Greyhound Welfare and Integrity Commission investigations.

Charges include:

- substance (drugging) offences: **33**
- misconduct/improper conduct/abusive behaviour: **17**
- striking a greyhound: **1**
- failure to maintain clean and sanitary kennels: **2**
- failure to provide adequate care: **2**
- breeding without license: **2**
- failure to keep health/treatment records: **2**
- placing bets on behalf of a minor: **2**



- 2.48 Animal welfare remains a contentious subject within Australian policy and there is limited critical examination of current greyhound racing policies. This relates to the existence of an “enforcement gap” in Australian animal law, where the actual practices deviate from the regulations. Weaknesses in the legal processes are identified, including ambiguous language in legislation, the involvement of non-government organisations (‘NGOs’) in enforcement, and inadequate penalties for offences.
- 2.49 Adding to the complexity, the Australian public holds diverse and sometimes conflicting attitudes toward animal welfare issues. This includes a significant defence of the existing status quo. The commodification of animals and prioritisation of economic interests over their well-being is evident not only in greyhound racing but also in adjacent industries like live export. Furthermore, it is noteworthy that instances of animal cruelty in both the live export and greyhound racing sectors have been exposed by animal activists and the media, rather than regulatory bodies.

A LOST SOCIAL LICENCE: OPPOSITION TO GREYHOUND RACING

- 2.52 The documented global decline of greyhound racing has been ongoing for years, with media outlets worldwide reporting on the industry's collapse. Between 2001 and 2014, the total amount wagered on American greyhound racing plummeted by 70%, leading to a continuous decline. The number of tracks has drastically reduced from sixty (60) to just two (2). In the United Kingdom, all of the London dog tracks have closed and are being repurposed for mixed housing, open spaces, and retail operations. In 2018, the Macau government ordered the closure of the Canidrome, China's only legal dog track, ending the deaths of 400 dogs annually and freeing up land for public use. Furthermore, Jamaica rejected the legalisation of dog racing in 2009, followed by South Africa in 2010, citing both economic deficiencies and humane concerns related to the activity. In fact, commercial greyhound racing now exists in only seven (7) countries. The global trend clearly aligns with protecting the well-being of greyhounds, reflecting a universal love for dogs that transcends all cultures.
- 2.53 In Australia, opposition from the community and legislative advocacy has grown substantially. This is evident in the ban on greyhound racing and trialling in the Australian Capital Territory (‘ACT’) since April 2018, following the enactment of the *Domestic Animals (Racing Greyhounds) Amendment Act 2017*. In Western Australia, Alison Xamon MLC presented a community petition with 11,500 Western Australian signatures urging the State Government to prohibit greyhound racing. In Queensland, Animal Liberation Queensland (‘ALQ’) and Labor MP Jennifer Howard, in collaboration with Animal Liberation, continue to lead opposition to the construction of a new dog track on grounds of animal cruelty. In Tasmania, a Parliamentary petition, presented by Cassy O’Connor MP, calling for an end to public funding for greyhound racing in the state garnered over 13,500 Tasmanian signatures. Ms. O’Connor pointed out that greyhound racing continues to lose its social acceptance, with Tasmanian taxpayers subsidising this form of animal cruelty to the tune of \$10 million annually. Supporting these calls is Andrew Wilkie MP, who cited fifteen greyhound deaths and nearly 370 greyhound injuries on Tasmanian tracks in 2021 as reasons to support a prohibition on greyhound racing in Tasmania.

GREYHOUND RACING AND GAMBLING

- 2.54 Australia has a long history of animal-related gambling that can be traced back to the late 1700s when early settlers incorporated British gambling customs into the colonial lifestyle. Organised greyhound racing began in Australia in 1929 and was closely associated with the betting industry.
- 2.55 The commercial money trail directs public money from State/Territory governments to the gambling industry and back again. Australian state governments artificially inflate prize money, pay breeding incentives, prop up financially failing clubs and build unwanted racetracks. And there is very little welfare oversight of the industry that receives all this financial support.

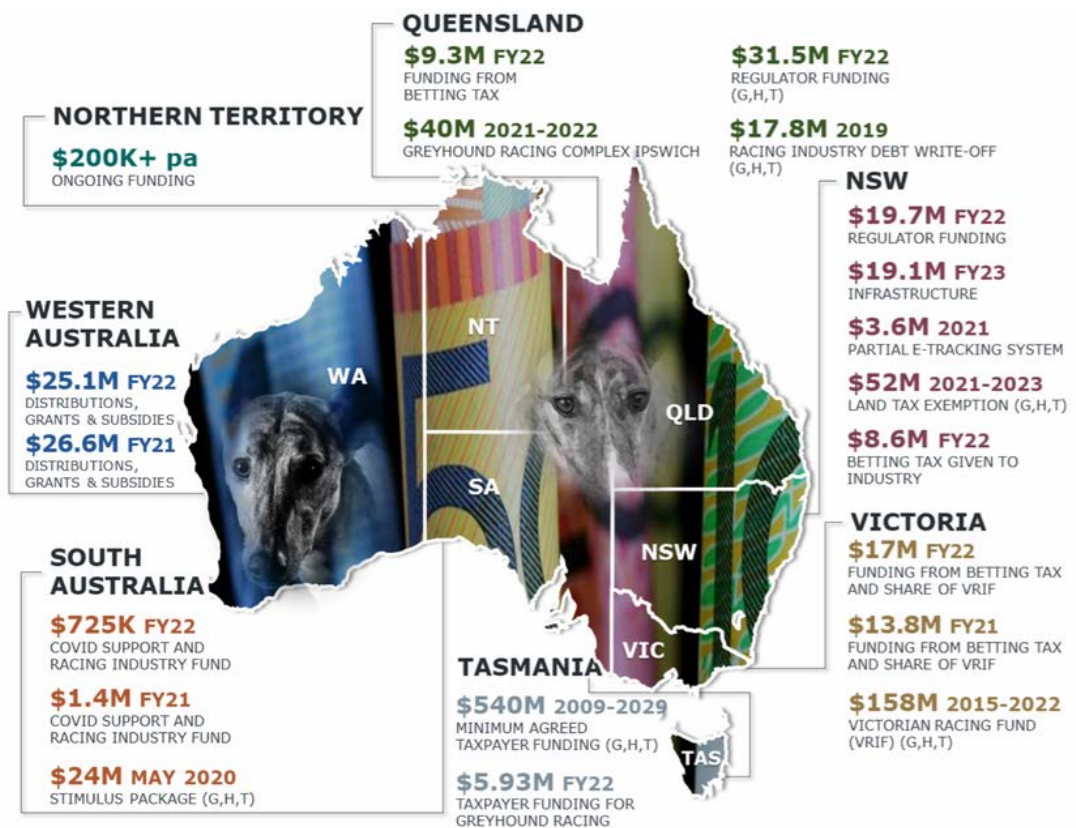


Image: State government funding of greyhound racing by state.

Source: Coalition for the Protection of Greyhounds.

I WAS **OBSTRUCTED** FROM THE **START** WITH **GREYHOUND RACING**

THEY SIMPLY DID NOT WANT OVERSIGHT

DAVID LANDA

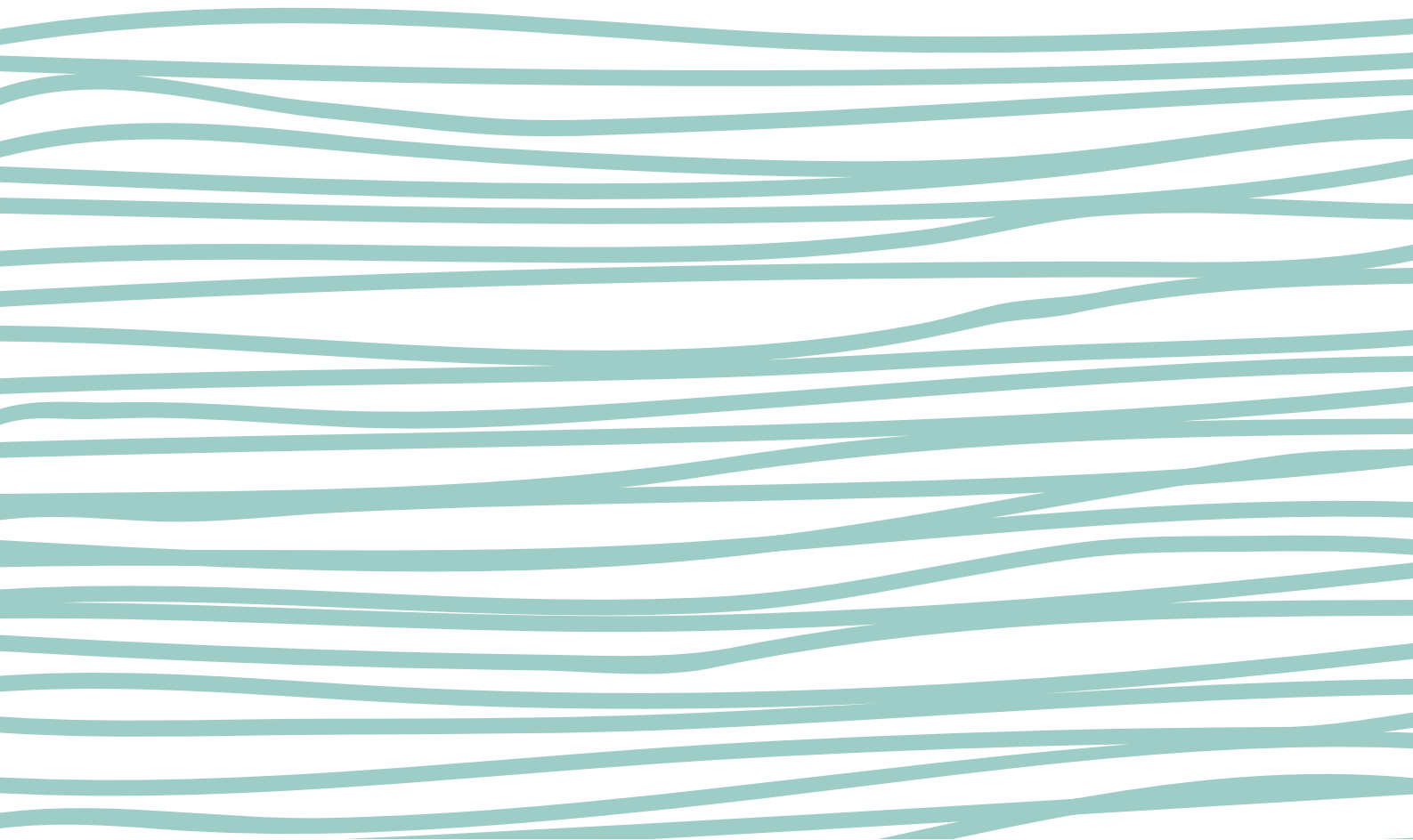
FORMER AUDITOR GENERAL OF GREYHOUND RACING NSW





SECTION THREE

ABOUT THE BILL



SECTION THREE

ABOUT THE BILL

- 3.1 Animal Liberation understands that the Bill will prohibit the exportation and importation of Australian greyhounds for racing, breeding and related commercial purposes, and specifically:
- 3.1.1 This important legislative reform will prohibit the export of Australian greyhounds for commercial purposes such as racing and breeding, and prohibit the export or import of breeding material.
 - 3.1.2 The Bill will limit the suffering, neglect and cruelty towards Australian greyhounds by ending their export to countries with lower or no welfare standards for greyhounds than those in Australia. The Bill will also limit current loopholes which allow Australian greyhounds to be exported to other countries considered 'safe', and then rerouted to other destinations.
- 3.2 The following section provides a brief overview of the Bill followed by a response.


PART 1: PROHIBITION ON COMMERCIAL EXPORT OF GREYHOUNDS

- 3.3 Animal Liberation endorses the proposed amendments outlined in Part 1 of the Bill, which introduces a new regulation (9ABA), to prohibit the export of greyhounds for breeding, racing, or any other commercial purpose. This amendment is a vital step towards promoting the ethical treatment and welfare of greyhounds and aligning with our nation's commitment to responsible and compassionate animal protection.
- 3.4 The inclusion of sub regulations (1) through (3) establishes an exemption mechanism, allowing for the Minister or an authorised individual to evaluate applications for the export of domestic companion greyhounds on a case-by-case basis. This approach recognises the importance of ensuring that legitimate exceptions, such as non-commercial activities or instances where exporting is in the best interest of the animal, can be considered while safeguarding against potential exploitative practices.
- 3.5 Sub regulations (4) and (5) outline the necessary requirements for applicants to submit written requests to the Minister (or authorised individual) along with relevant information to support their application. This ensures a transparent and structured process for evaluating applications, allowing for a comprehensive assessment of each case.
- 3.6 We appreciate that sub regulation (6) grants the Minister or authorised person the discretion to consider any pertinent information when making a decision regarding the export of a greyhound. This approach enables a thorough evaluation of individual circumstances, acknowledging that each case may have unique considerations that warrant assessment.

- 3.7 Under sub regulations (7) and (8), the requirement for prompt notification to the Applicant of the decision, along with any specified conditions or requirements, ensures transparency and accountability throughout the process. It also ensures that Applicants are informed promptly of the outcome and understand any conditions that must be met should their application be approved.
- 3.8 Moreover, the provision enabling the revocation of permission at any time, as specified in sub regulations (9) and (10), demonstrates a commitment to continual oversight and intervention when necessary to protect the welfare of greyhounds. The requirement for the Minister or authorised officer ('AO') to promptly inform the Applicant of any revocation further reinforces transparency and accountability.
- 3.9 The record-keeping obligation outlined in sub regulation (11) serves as an important measure to monitor and regulate the export of greyhounds, allowing for accountability and transparency in the process. The ability to produce these records upon request by the Minister or authorised person ensures that exporters can demonstrate compliance with regulations.
- 3.10 We support the establishment of the Administrative Appeals Tribunal ('the Tribunal') for reviewing decisions, as stated in sub regulations (12) to (14). This provision guarantees an impartial and transparent mechanism for applicants to seek redress in case of disputes or concerns regarding the decision-making process.
- 3.11 Additionally, designating an Australian Public Service ('APS') employee within the department as an authorised officer for the purposes of this regulation (sub regulation 15) provides a clear and effective framework for implementation and enforcement. Finally, sub regulation (16) providing definitions for relevant terms pertaining to the new regulation 9ABA ensures clarity and consistency in interpreting and applying the provisions.
- 3.12 In conclusion, we firmly believe that the proposed amendments in Part 1 of the Bill are crucial for protecting greyhounds from potential exploitation, and ensuring their welfare is prioritised in the export process. We urge the government to proceed with the adoption of these amendments to demonstrate our nation's commitment to responsible and compassionate treatment of animals.

PART 2: PROHIBITION ON COMMERCIAL IMPORTATION OF GREYHOUNDS

- 3.13 Animal Liberation supports the proposed amendments to the Customs (Prohibited Imports) Regulations 1956, specifically Part 2, which introduces a new regulation (4WA) to prohibit the importation of greyhounds for activities such as breeding, racing, or any other commercial purposes. We believe that this amendment is essential for promoting animal welfare, protecting the interests of greyhounds, and addressing concerns related to the importation of these dogs.
- 3.14 The new regulation sets clear guidelines for the importation of domestic pet greyhounds, allowing the Minister or an authorised individual to carefully consider applications and grant written permission under specific conditions or requirements (see sub regulations 2-8). This aspect of the amendment strikes a crucial balance between allowing exceptions for legitimate purposes, such as companionship, while simultaneously preventing the importation of greyhounds for exploitative or harmful practices.

- 
- 3.15 Additionally, the provision allowing the Minister to revoke the permission for importation at any time (sub regulations 9-10) further reinforces the government's commitment to ensuring the well-being and protection of these animals. Should there be any concerns or issues related to the imported greyhounds' welfare or treatment, prompt action can be taken to address the situation and prevent any potential harm.
- 3.16 We support the provision requiring the Administrative Appeals Tribunal ('the Tribunal') to review decisions related to the importation of greyhounds (see sub regulations 11-13). This provision ensures a transparent and impartial process, allowing redress if Applicants believe their application has been unjustly rejected or if they wish to challenge any decisions. Furthermore, granting the Minister the authority to designate an APS employee within the department as an AO for the purposes of this regulation (sub regulation 14) adds an additional layer of efficiency and expertise to the implementation and enforcement of these new measures.
- 3.17 Finally, the inclusion of definitions for relevant terms pertaining to the new regulation (sub regulation 15) provides clarity and precision, ensuring that all parties involved have a clear understanding of the provisions and their implications.
- 3.18 In conclusion, the proposed amendments outlined in Part 2 of the Customs (Prohibited Imports) Regulations 1956 represent a significant step towards safeguarding the welfare of greyhounds and ensuring responsible and ethical treatment of these animals in Australia.
- 3.19 We urge the government to proceed with the adoption of these amendments to protect these beloved greyhounds and promote a compassionate and responsible approach to their importation and treatment.

PART 3: AMENDMENTS AFFECTING PROHIBITIONS

- 3.20 Item 3 states that any legislative instrument aiming to remove or bypass the prohibition outlined in items 1 and 2 will only take effect once it has been approved by resolution in both Houses of the Parliament.

WHAT HAPPENS TO THEM MATTERS TO THEM

TOM REGAN

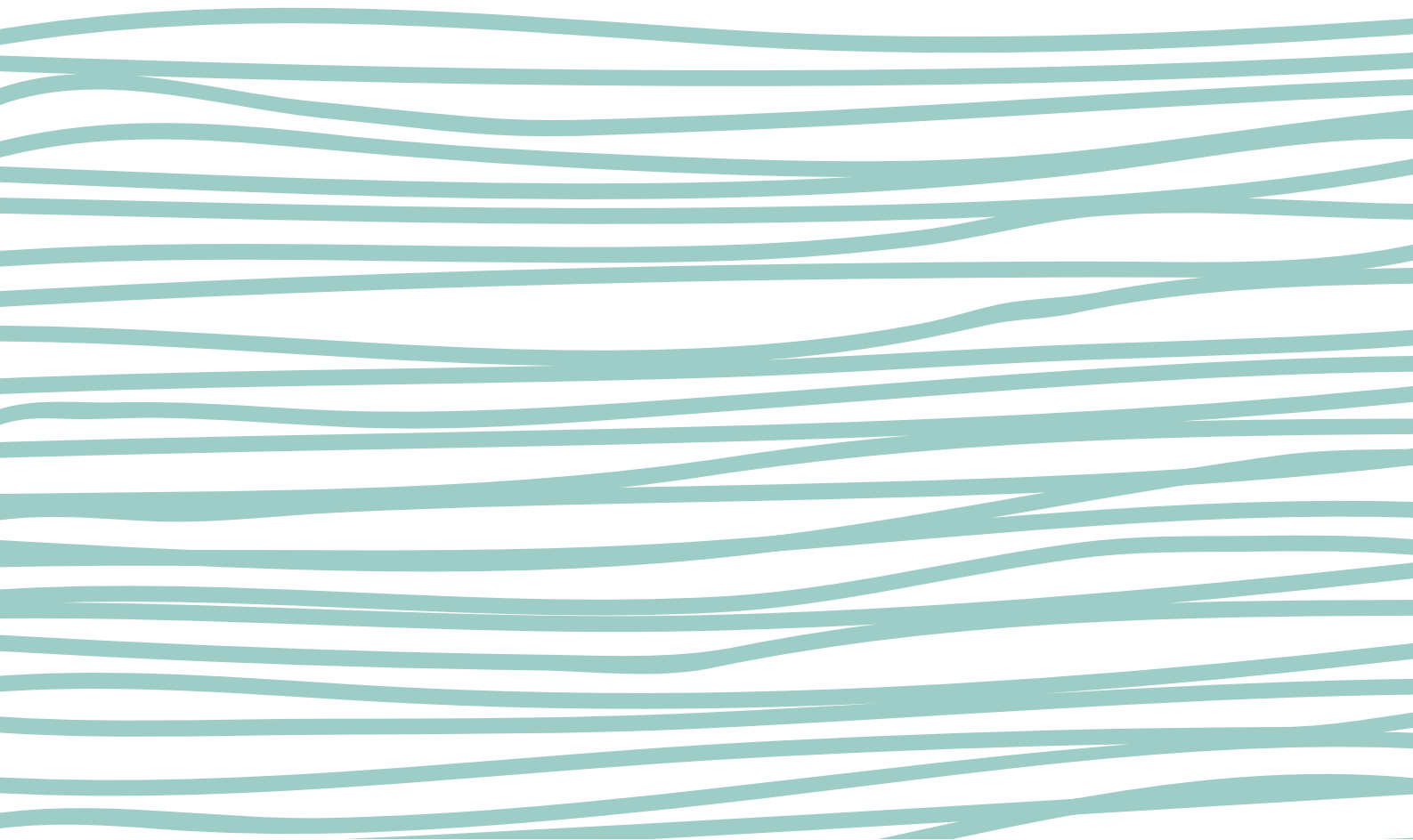
THE CASE FOR ANIMAL RIGHTS (1983)





SECTION FOUR

ENDORSEMENT OF THE BILL



SECTION FOUR

ENDORSEMENT OF THE BILL

Animal Liberation's support for the Bill is based on the following evidenced considerations:

- 4.1 Statements made by RSPCA Australia, as Australia's recognised and leading animal welfare agency, summarise the primary animal welfare issues associated with greyhound racing as follows:
 - 4.1.1 Around 40% of the 11,000 greyhounds bred in Australia each year are surplus to requirements;
 - 4.1.2 The average lifespan of a racing greyhound is 1.5 years, the average lifespan of a non-racing greyhound is 10-12 years;
 - 4.1.3 An estimated 750 greyhounds are injured on Australian greyhound racing tracks each month;
 - 4.1.4 State governments invest millions of dollars to prop up the greyhound racing industry due to the revenue generated by gambling;
 - 4.1.5 Greyhounds are drugged with a range of banned substances including EPO, amphetamines, methamphetamines, caffeine, anabolic steroids, Viagra and cocaine. These can have serious psychological and physical effects and;
 - 4.1.6 Greyhounds are exported to countries that have poor or no animal welfare protections and are also vulnerable to entering the dog meat trade.
- 4.2 Clear public expectations that the Federal Government should take a decisive, proactive and lead role with the oversight, management, compliance and enforcement of animal welfare and wellbeing, and take all necessary and required actions to ensure the prevention of cruelty towards animals, and reduce the risks of cruelty towards animals.
- 4.3 Evidenced historical and multiple incidents involving the export of Australian greyhounds to a fate of egregious animal suffering, cruelty, abuse and death.
- 4.4 Across Australia, State/Territory Governments, and industry bodies have consistently failed to ensure compliance by their own participants with current rules, regulations, standards and Codes of Practice. Even where breaches are identified, the penalties are completely inadequate and fail to act as a deterrent.
- 4.5 Across Australia, greyhound racing industry bodies continue to have a 'commercial' focus and therefore an ongoing inherent 'conflict of interest' between profits and animal welfare. The only exception is in NSW with the Greyhound Welfare and Integrity Commission ('GWIC'), established by the Greyhound Racing Act 2017, as an independent regulator for the greyhound racing industry in NSW, including oversight of Greyhound Racing NSW ('GRNSW').

- 4.6 Written advice (Tabled as Appendix 1) from GWIC to Animal Liberation regarding the export of NSW registered greyhounds, dated August 2023, in part, confirmed:
- 4.6.1 *"The Commission is not routinely notified of individual greyhounds exported from NSW, unless the greyhound is owned by a registered NSW greyhound industry participant. The Commission is therefore unable to provide advice as to the proportion of greyhounds exported from Australia that may have come from NSW".*
- 4.6.2 *"The Commission has been briefed by Greyhound Racing NSW in relation to its US rehoming program in addition to being provided with agreements it has in place with US rehoming organisations designed to ensure quality welfare processes are followed in the rehoming of these greyhounds. In addition to this, in the near future the Commission will be conducting a physical audit of the program to ensure that it complies with guidelines for best practice in greyhound rehoming".*
- 4.7 In seeking to access specific information and data from Greyhounds Australasia ('GA'), related to the export of Australian greyhounds, Animal Liberation corresponded with GA. Disappointingly GA has only provided limited information as Tabled as Appendix 2.
- 4.8 In seeking to access specific information and data related to the export of Australian greyhounds to the United States ('US'), Animal Liberation corresponded with the Animal and Plant Health Inspection Service, US Department of Agriculture ('USDA'). Disappointingly, in spite of repeated requests, the USDA has failed to respond or provide any of the requested information and data. Tabled as Appendix 3.
- 4.9 No Australian State/Territory Government or industry body or regulatory body such as GWIC, has been able to demonstrate accurate or fully transparent whole-of-life tracking of Australian greyhounds within Australia, let alone to overseas destinations. There have been numerous incidents where Australian greyhounds have been killed and yet their records state these greyhounds as 'retired'. Ongoing NSW greyhounds continue to end up in pounds and shelters in spite of the clear GWIC rehoming rules, regulations and policies, and all the financial incentives available to participants to regime greyhounds responsibly.
- 4.10 Australian greyhounds continue to be exported to countries where they are vulnerable to abuse and premature death. Recent examples include Canya Cruise and Turbo Thomas who were both exported to China in 2021 just days after racing at Melbourne tracks. While they were exported as "companion animals", they are now both listed on a Chinese breeding website.
- 4.11 Australia has a long history of sending unwanted greyhounds to countries where there is no guarantee they will be treated humanely. This includes around 20,000 dogs sent to Macau where dogs were kept in prison like cells and then killed.
- 4.12 This largely unregulated industry and export of Australian greyhounds has continued despite the clear desire and expectations of the Australian public calling on successive federal governments to ban the export and import of greyhounds for commercial use.
- 4.13 There is a clear lack of animal welfare legal protection in many importing

- 
- 4.13 countries and Australian greyhounds are exported to countries that either do not have animal protection laws, or they are not enforced.
- 4.14 The lack of a formal tracking system for Australian greyhounds exported to other countries is a major issue. Once greyhounds leave Australia, there is no record or reliable or effective tracking of their fate. They are no longer protected by any Australian animal welfare regulation, and there is no guarantee they will be treated humanely.
- 4.15 The lack of formal rehoming and adoption programs in many export destination countries is a major concern. There is no expectation of a life post-racing for greyhounds in some countries, meaning greyhounds continue to be traded as commodities based on financial viability and value. Many are forced to race past an appropriate retirement age, killed at an unnecessarily young age, or continue to be exploited for commercial breeding.
- 4.16 Stress and injuries associated with long-distance transport poses significant welfare and wellbeing risks for exported Australian greyhounds. Flight times as well as delays with boarding and unloading to most countries from Australia are excessive, and many overseas destinations include stopovers. Greyhounds have been known to suffer great distress, injury and even death during flight.
- 4.17 There is a clear lack of current legislation and regulation around Australian greyhound exports and loopholes are often exploited by industry participants. The racing industry's 'passport' system in place for Australian greyhound exports is not enforced by government legislation. The penalties for breaching the industry rules are minimal and fail to provide any deterrent. The racing industry's solution for an amendment to the Export Control Act, will not stop participants exporting greyhounds to blacklisted countries via approved destinations.
- 4.18 Currently, the export of Australian greyhounds, including those exported as "companion greyhounds" does not require mandatory desexing. Further, while the desexing would prevent further exploitation from commercial breeding, it does not stop or prevent Australian greyhounds from being used, exploited or killed for other human uses.



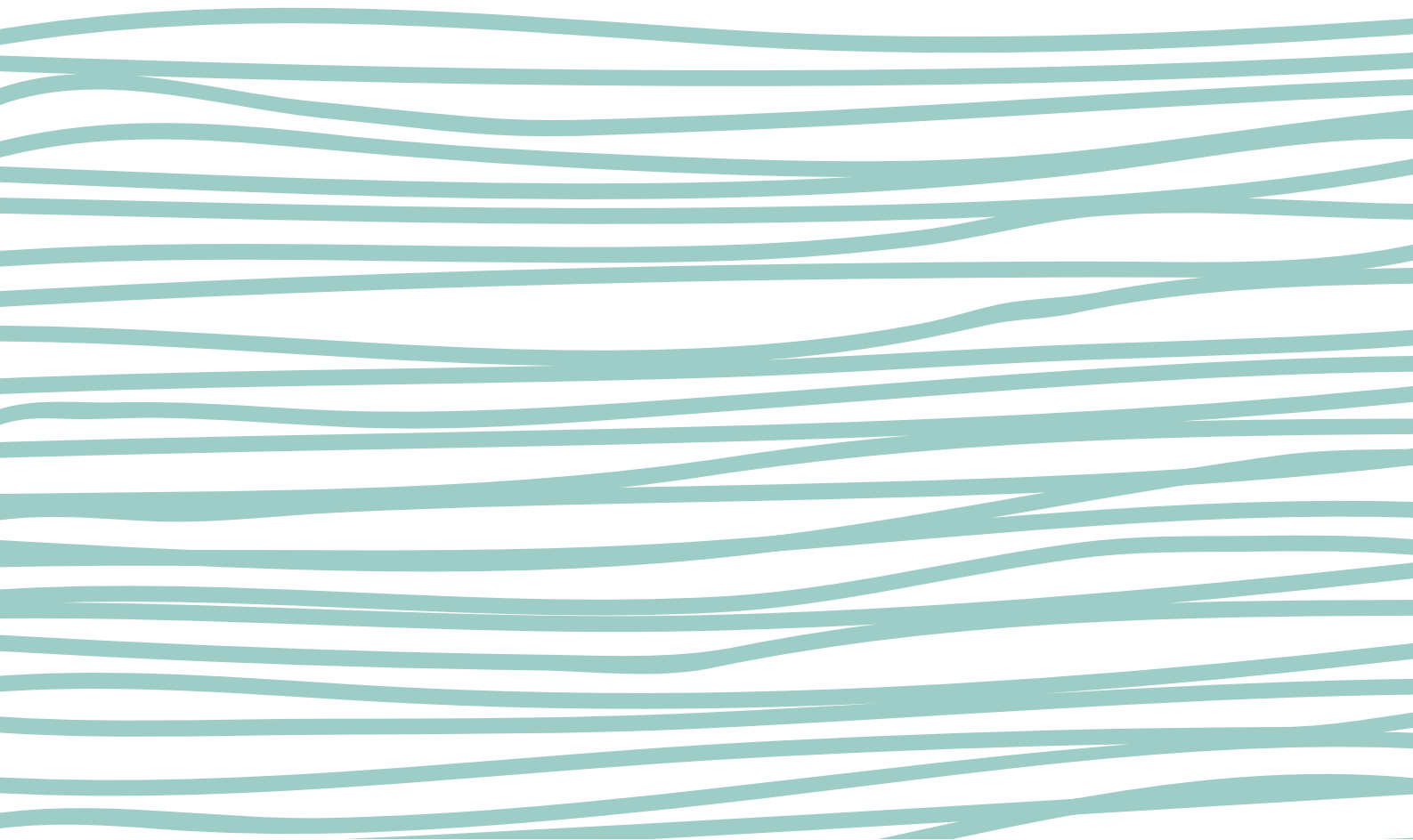
THE PHYSICAL ABUSE, RISK OF INJURY AND CULLING MEAN THAT GREYHOUND RACING HAS A LIKELY, IF NOT GUARANTEED RISK OF DEATH FOR THE PARTICIPATING DOG WHICH MEANS SOME WOULD CLASSIFY IT AS A BLOOD SPORT

GREYHOUND RACING NSW REPORT 2015



SECTION FIVE

ADDITIONAL RECOMMENDATIONS



SECTION FIVE

ADDITIONAL RECOMMENDATIONS

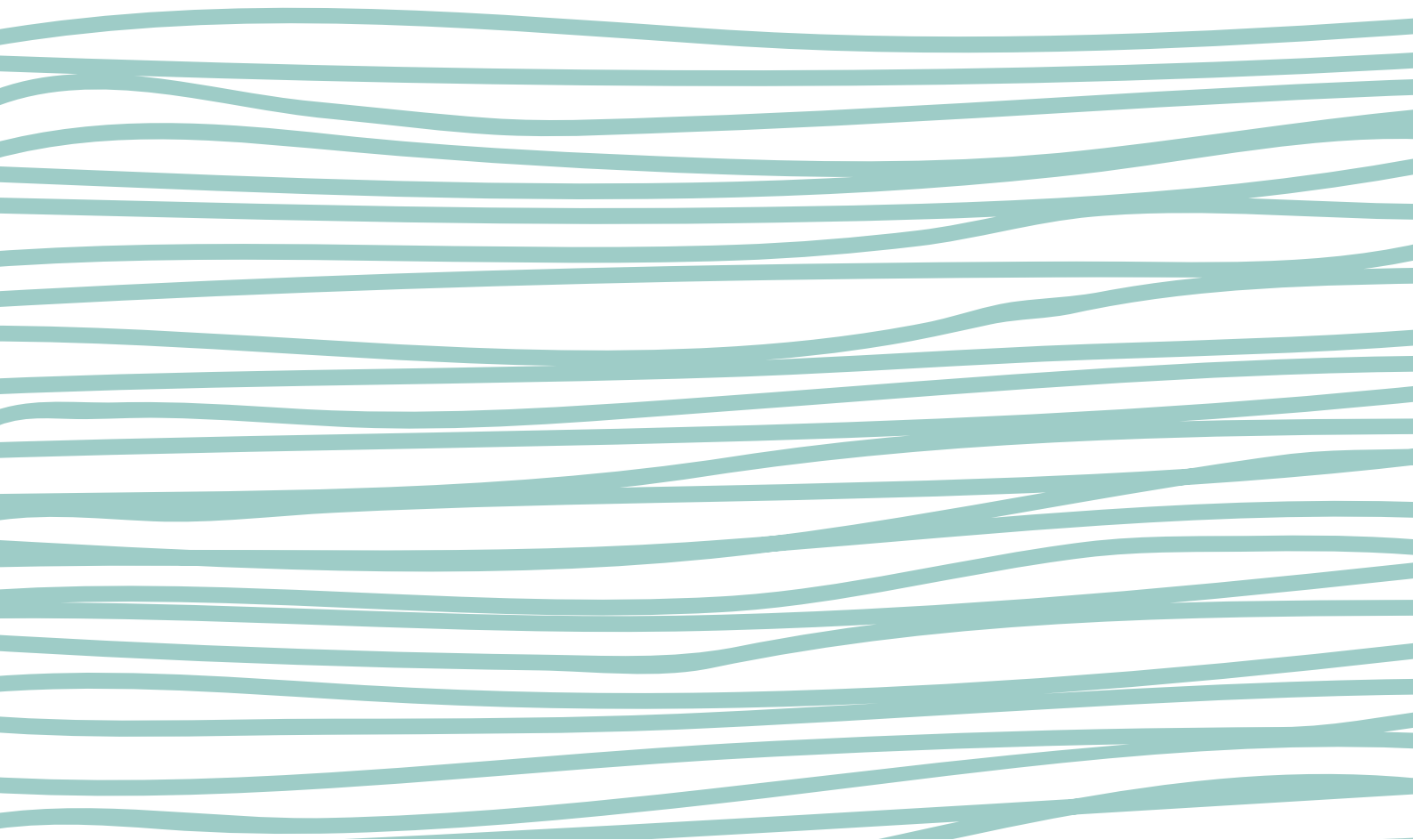
We further recommend the Senate Standing Committee on Rural and Regional Affairs and Transport Senate ('the Committee') give thorough consideration of the following additional 10 provisions:

- 5.1 The prohibition of commercial greyhound racing in all Australian states and territories;
- 5.2 A proscription of all forms of wagering on domestic and foreign dog races;
- 5.3 An end to all new tracks and public money expenditure on refurbishing existing tracks. Animal Liberation contends the Australia-wide injury and death rates confirm there is no such thing as a 'safe' track. While greyhound racing remains legal, an immediate transition from curved to straight tracks;
- 5.4 The creation of a government controlled annual fund from betting proceeds for greyhound adoption to ensure the protection of all greyhounds leaving the industry;
- 5.5 The implementation of a robust and publicly accessible Australia-wide whole-of-life tracking for all greyhounds bred for commercial racing, including those which never race or are rehomed by industry participants regardless of the Australian or overseas destination;
- 5.6 An immediate end to unsustainable greyhound breeding and the introduction of strict and enforceable caps to ensure all greyhounds bred for commercial purposes can live out the term of their natural life, in loving and responsible homes, in line with clear public expectations. The industry's current breeding of six (6) times more dogs than can be rehomed is not only reckless and irresponsible, it is impacting current pressing pound and shelter reform concerns;
- 5.7 An immediate end to taxpayer funding towards the greyhound racing industry. A recent Australian national survey undertaken by GREY2K USA Worldwide and CPG confirmed 69% of Australians oppose the use of taxpayer funds to prop up the greyhound racing industry;
- 5.8 Establishment of government (public) funded, managed and publicly accountable State Territory independent regulators to oversee and enforce compliance with the welfare and wellbeing of greyhounds in the greyhound racing industry;
- 5.9 That all state/territory industry greyhound rescue, rehabilitation and rehoming should be managed and overseen by independent regulators rather than the commercial greyhound racing bodies. In NSW, GWIC was established to oversee greyhound 'welfare' and 'integrity' and yet GRNSW is still managing the Greyhounds As Pets ('GAP') program;
- 5.10 The establishment of an Independent Office of Animal Welfare ('IOAW') responsible for administering and enforcing these proposals.



SECTION SIX

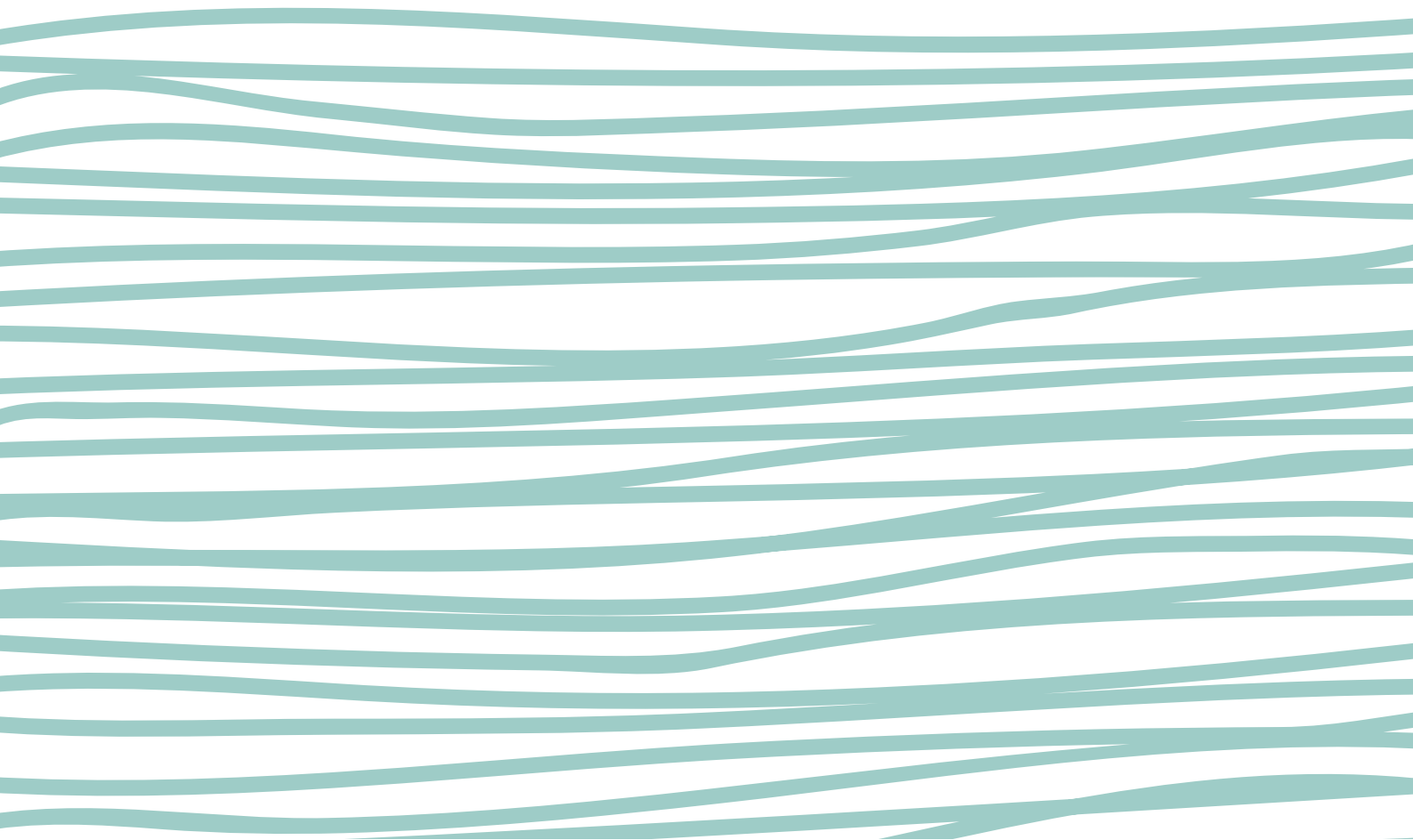
SUMMARY AND CONCLUSION



SUMMARY AND CONCLUSION

- 6.1 Animal Liberation contends Australian governments and the industry bodies have been given more than sufficient time to proactively regulate their industry and their participants, and have repeatedly failed to do so, or protect the welfare and wellbeing of greyhounds.
- 6.2 Animal Liberation's views and conclusions about the greyhound racing industry, and the export of Australian greyhounds, and our strong support for the objectives of the Bill are all closely intertwined.
- 6.3 We maintain that many of the issues associated with the export of Australian greyhounds emanate from many of the failings by the greyhound racing industry. Addressing one issue requires consideration of a range of issues, so that we can apply a holistic rather than an isolated approach when reviewing such matters based on the clear objective of meaningful and progressive reform, rather than more band aid solutions.
- 6.4 Australian greyhound exports have historically demonstrated a profit driven and cruel industry and indifferent governments. It was only as a result of the work by animal activists, credible media and an outpouring of public outrage that forced the industry to change some greyhound export practices. The changes have however not gone far enough, and do not include legislative reform, and so, many of the serious animal welfare risks remain for exported Australian greyhounds.
- 6.5 While Animal Liberation will continue to actively campaign to end greyhound racing in Australia, we recognise that during the interim period, the welfare of all individual exported Australian greyhounds must also be protected. It is accordingly our strong view that the only effective and meaningful way to protect Australian greyhounds from ending up in inhumane conditions which do not meet Australia's animal welfare standards, or public expectations, is federal legislation to ban the export of all Australian greyhounds for commercial purposes.
- 6.6 Accordingly, Animal Liberation fully supports the objectives of the *Customs Legislation Amendment (Commercial Greyhound Export and Import Prohibition) Bill 2021* ('the Bill') and strongly encourages the Senate to support and pass this long overdue legislation.

REFERENCES



REFERENCES

Legislation, policies, government and industry documents

Betting and Racing Act 1998 (NSW)

Code of Practice for Breeding, Rearing and Education

Code of Practice for the Keeping of Greyhounds in Training

Companion Animals Act 1998 (NSW)

Companion Animals Breeding Standards

Companion Animals Regulation 2008 (NSW)

Greyhound Industry Reform Panel

Greyhound Racing Regulation 2019 (NSW)

Greyhound Re-homing Policy

Greyhound Racing NSW Annual Reports: 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022

Greyhound Racing NSW, Rehoming - Rehoming Assistance Schemes, Greyhounds As Pets, Greenhounds, Information for Independent Adoption Groups and Pounds

Greyhound Welfare and Integrity Commission: Annual Reports 2017/28, 2018/19, 2019/20, 2020/21, 2021/22

Greyhound Welfare Integrity Commission: Race Injury Review, Retirement and End of Life Report

Greyhound Welfare and Integrity Commission: Reports and Statistics - Breeding and Whelping, Injury Report

NSW Animal Welfare Code of Practice No. 5 - Dogs and cats in animal boarding establishments

NSW Greyhound Welfare Code of Practice

Prevention of Cruelty to Animals Act 1979 (NSW)

Prevention of Cruelty to Animals Regulation 2012 (NSW)

Race Day Hydration and Hot Weather Policy

Special Commission of Inquiry into the NSW Greyhound Racing Industry

Swabbing Policy

Terms of Reference, Legislative Council Select Committee's Inquiry into the Greyhound Welfare and Integrity Commission

Totalizator Act 1997 (NSW)

Trial Track Policy

Other sources

ABC. *Making a Killing*. Available online: www.abc.net.au/news/2015-02-16/making-a-killing/6127124.

Cobb, M.; Branson, N.; McGreevy, P.; Bennett, P.; Rooney, N.; Maglalinski, T.; Howell, T.; Dawson, K. Review and Assessment of Best Practice – Rearing, Socialisation, Education and Training Methods for Greyhounds in a Racing Context; Working Dog Alliance Australia: Sydney, Australia, 2015.

Dobbin, A. Turbo Thomas makes it 12 straight at Maitland. Available online: <https://m.thegreyhoundrecorder.com.au/news/turbo-thomas-makes-it-12-straight-25721>.

Dobbin, A. Turbo Thomas sets new TAB win streak record. Available online: www.thegreyhoundrecorder.com.au/news/turbo-thomas-sets-new-win-streak-record-26479.

Dobbin, A. Greyhound rehoming says g'day to the USA. Available online: <https://thegreyhoundrecorder.com.au/news/greyhound-rehoming-says-gday-to-the-usa-47597>.

Eager, D. Identifying Optimal Greyhound Track Design for Greyhound Safety and Welfare: Phase I Report Jan. 2016 to 31 Dec. 2016; University of Technology Sydney: Sydney, Australia, 2017.

FitzSimmons, P. Why greyhound racing's new code is a complete crock. Available online: www.smh.com.au/sport/gone-to-the-dogs-why-greyhound-racing-s-new-code-is-a-complete-crock-20200703-p558tt.html.

Hampton, J.; Jones, B.; McGreevy, P. Social license and animal welfare: developments from the past decade in Australia. *Animals* **2020**, *10*, 2237.

Knaus, C. NSW government accused of undermining greyhound racing regulator. Available online: www.theguardian.com/australia-news/2020/oct/16/nsw-government-accused-of-undermining-greyhound-racing-regulator.

Markwell, K.; Firth, T.; Hing, N.. Blood on the race track: an analysis of ethical concerns regarding animal-based gambling. *Ann. Leis. Res.* **2017**, *20*, 594-609.

McEwan, A.; Skandakumar, K. The welfare of greyhounds in Australian racing: has the industry run its course? *Aust. Anim. Prot. Law J.*, **2011**, *6*, 52-74.

McHugh, M. *Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales*. New South Wales Department of Justice: Sydney, Australia, 2016.

O'Brien, N. Allegations prompt inquiry into greyhound industry. Available online: www.smh.com.au/national/nsw/allegations-prompt-inquiry-into-greyhound-industry-20130827-2soea.html.

RSPCA Australia. Good Animal Welfare. Available online: [https://kb.rspca.org.au/knowledge-base/goodanimal\[1\]welfare](https://kb.rspca.org.au/knowledge-base/goodanimal[1]welfare).

Sicard, G.; Short, K.; Manley, P. A survey of injuries at five greyhound racing tracks. *J. Small Anim. Pract.*, **1999**, *40*, 428-432.

Thomas, J.; Adams, N.; Farnworth, M. Characteristics of ex-racing greyhounds in New Zealand and their impact on re-homing. *Anim. Welf.* **2017**, *26*, 345-354.

Wellauer, K.; Rubbo L.; Cavanagh, M. NSW greyhound industry welcomes 'strict' new code of practice for animal welfare. Available online: www.abc.net.au/news/2020-06-30/greyhound-industry-code-of-practice-welfare-nsw/12405334.

White, J. Australian greyhound exports: going, going, gone? Available online: <https://coalitionprotectgreyhounds.wordpress.com/2020/10/24/australian-greyhound-exports>.



CONTACT US

Postal Address: 378 | 846-850 Military Rd, MOSMAN NSW 2088

ABN: 66 002228 328

Email: lisa.r@animal-lib.org.au

Web: www.al.org.au

Phone: (02) 9262 3221

Contact: Lisa J Ryan, regional campaign manager
Alex Vince, campaign director

