

# Independent Inquiry into the Governance of the Greyhound Racing Industry

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Government of  
South Australia

# Abbreviations and Review Statistics

<b>GRSA</b>	Greyhound Racing South Australia
<b>GA</b>	Greyhounds Australasia
<b>IHP</b>	Integrity Hearings Panel
<b>IWC</b>	Integrity Welfare Committee
<b>ICG</b>	Industry Consultative Group
<b>GAP</b>	Greyhounds As Pets (SA)
<b>GIRI</b>	Greyhound Industry Reform Inspector
<b>GWIC</b>	Greyhound Welfare Integrity Commission
<b>AWP</b>	Animal Welfare Policy (Greyhound Racing SA)
<b>AWA</b>	Animal Welfare Act 1985 (SA)
<b>GAR</b>	Greyhounds Australasia Rules
<b>Local Rules</b>	Greyhound Racing SA Local Rules

## Review Statistics

During the course of this Review, both the Reviewer and the inquiry director conducted the following activities:

- 4** Tracks visited
- 16** In person interviews conducted
- 373** Industry surveys received
- 582** Submissions received in total
- 18** Meetings held with both industry and non industry persons

**Warning: This Report contains images and descriptions of greyhounds in physical distress. These images may be confronting to readers.**

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# Terms of Reference

On 14 August 2023, the Government of South Australia established an independent inquiry (in this report hereafter referred to as ‘the Review’) into the regulatory regime, operations, culture, governance and practices of the greyhound racing industry in South Australia. The Terms of Reference stated:

## Purpose

The purpose of the inquiry is to obtain an independent, system-level assessment of the:

- current operations, culture, governance and practices of the South Australian greyhound racing industry;
- nature and efficacy of the current model of regulation; and
- relationship, if any, between that model and the operation, culture, governance and practices of the industry.

The Inquirer will report to the Minister for Recreation, Sport, and Racing on its assessment, including in relation to the industry’s regulatory environment, approved training methods, governance and integrity, and make recommendations on possible improvements.

## Scope

The Inquirer is to undertake an inquiry that will:

- Engage with stakeholders across the greyhound racing and animal welfare sectors to examine the industry’s operations, culture and practices, including in relation to integrity and/or animal welfare issues.
- Review the current regulatory framework for greyhound racing in South Australia in the context of industry best practice and governance. This may include:
- examining if the current system inhibits the ability to prevent, investigate or respond to serious allegations of animal mistreatment;
- identifying any systemic issues or challenges across the greyhound racing industry which the current model of regulation may be unable to or limited in identifying, responding to and/or resolving satisfactorily; and
- examining alternative models of industry regulation and integrity frameworks.

- Review whether, and if so how, the culture of the greyhound racing industry promotes integrity and regulatory compliance, including with regard to animal welfare.

## Procedures

- The Inquirer may request any person or organisation they see fit, including those in the greyhound racing industry or animal welfare sector, to provide submissions, documents and/or information to the Inquirer for the purposes of the inquiry. Submissions may be received by the Inquirer in writing or orally.
- The Inquirer may engage with experts as they see fit, including experts in the greyhound industry, including its regulation and/or its integrity, and experts in animal welfare.
- Any submissions, documents or information received by the Inquirer may be received confidentially at the Inquirer’s discretion.
- In the conduct of the inquiry, the safety and anonymity of any person who may reasonably fear recrimination for providing information to the Inquirer for the purposes of the inquiry is paramount.
- If the Inquirer identifies a matter or matters that it considers ought to be the subject of investigation or regulatory action by another body, the Inquirer:
- may, at any time during the inquiry, refer that matter or those matters to an appropriate investigative and/or regulatory body for further action; and
- must, on the completion of the inquiry, refer that matter or those matters to an appropriate investigative and/or regulatory body for further action, unless it has already done so during the course of the inquiry.
- Any deviations from these Terms of Reference will require approval from the Minister for Recreation, Sport, and Racing.

## Reporting

The Inquirer must provide a final report to the Minister for Recreation, Sport, and Racing by no later than 30 November 2023. The report should record the results of the inquiry, its assessments, conclusions and recommendations, and any referrals that have been, or are proposed to be, made by the Inquirer.



# Executive Summary

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Greyhound Racing in South Australia is at a crossroads. It was for many decades a sport and pastime for lower and middle income families, who participated in caring for their greyhound/s and getting enjoyment from seeing their dogs compete against other dogs in a racing environment. As for the dog itself, it is reportedly the world's oldest purebred breed and according to the Dog and Cat Management Board in South Australia it has for many years been one of the most popularly bred dogs. The breed has a relaxed and generally calm nature, but they are a sight hound and are bred for, and like to, chase. They are the fastest purebred dog in the world and are an historically unique breed having reportedly been transported to Australia on the first fleet. The fact that greyhounds are generally good-natured pets, can run fast, and enjoy running, first led to the community running their dogs competitively, as a social occasion. This continued for many decades until a fundamental change altered the entire trajectory of greyhound racing. This modification was the introduction of legal betting.

In 1972, the South Australian government, led at that time by Premier Don Dunstan passed legislation which allowed betting on greyhound racing in the form of bookmaker and totalisator retail (TAB shop fronts) and on-course betting. This immediately led to an influx of funding into the sport and to government. The greyhound industry was over time able to professionalise a business model which also led to its events being televised, which in turn brought in further funding through sponsorships. Greyhound racing in South Australia started with three main totalisator meetings per week and over the years has grown that product to the point where today there are meetings often held thirteen days a fortnight at four tracks. The more totalisator meetings held, the more betting revenue the sport receives. The revenue the sport receives from gambling has grown exponentially and this was boosted further when corporate bookmakers began operating. They now provide the largest single source of revenue to the industry. Last year Greyhound Racing SA (GRSA) received 22.9 million dollars in revenue from corporate bookmakers alone (GRSA annual report 2021-22).

Today, the sport of greyhound racing operates as a business. In South Australia it is governed by a board comprised mostly of experienced business executives. It makes decisions that are designed to keep its product competitive and deal with challenges to that goal. The changes to professionalise the sport have meant that participants in the industry have also been required to change. Prizemoney available to the connections of greyhounds has increased leading to small individual or family trainers being joined by an increasing number of semi-professional and professional trainers, some with racing teams numbering as many as 100 greyhounds at large kennel facilities around the state. The income for a top trainer can amount to several hundred thousand dollars a year. Increasingly though, races with the most significant prizemoney are being won by greyhounds which are travelled from interstate.

This evolution in the industry has presented a number of current day challenges for the industry. These are the reliance on only one significant income stream, the aggregation of significant prizemoney to a small number of participants, the age profile of the sport's participants, and most significantly, animal welfare which includes re-homing programs. The issue of animal welfare acts as a constant challenge to any 'social licence' for the sport's continuance.



## Reliance on one major income stream

It is challenging for any organisation to rely on only one significant income source. Maintaining and growing that income can become a singular focus and lead to decision making that risks the success of other priorities.

For greyhound racing its income stream is derived from licensed gambling. Currently, GRSA, according to its annual report, receives approximately 31 million dollars per year from gambling sources which includes totalisator and corporate bookmakers. The industry receives very little income from other sources such as sponsorship and unlike most other states, receives no regularised funding from the state government outside of gambling returns. This single funding source effectively means that the sport is reliant upon gambling revenue for its economic survival. Race meetings are set at days and times that suit the availability of screen time at Sky Racing, which is a broadcaster owned by Tabcorp, so that Australians can bet on racing products in the pubs, clubs and TAB retail outlets around Australia. For example, there is a meeting at Angle Park some Saturday mornings which meets an available broadcast timeslot at Sky Racing. In short, the more meetings that GRSA can hold, the more revenue they receive.

Country tracks in South Australia have been progressively closed over recent years partly due to the fact that they were not making money through betting revenue. It is not known what measures were taken to keep some of these tracks operating purely for participants' sporting interest, but the fact they are no longer operational is considered a positive by the industry from a commercial viewpoint.

The social component of the sport, such as creating community and providing a social outlet for working class South Australians, appears to have a lesser focus due to the industry's need to generate a product for gambling revenue. Race meetings are often held as transactional affairs with many trainers and connections arriving, kennelling their greyhounds, participating in the race and then going home. Races are held on average every 20 minutes so that 12 races can be held in the allocated Sky viewing timeslot. More could be done to keep connections at the course for social interaction, however, with the exception of major race meetings, there do not appear to be activities held at meetings to encourage participants to stay - albeit

there are good quality restaurant/cafe facilities at the courses for those who wish to pay.

This reliance on gambling revenue means that if there were an interruption to gambling activities on greyhound racing, the sport would over time, and without other funding support, be reduced to operating as it did in the 1950's. This took the form of participants meeting for coursing events, where two dogs competed against each other in a round robin fashion on an open course, with prizemoney being a trophy and a ribbon. In other words, it would return to fully amateur sport status.

Finally, this significant reliance on gambling funding could act as an inhibitor when the industry needs to reduce the number of greyhounds being bred on animal welfare grounds. This is because there are challenges maintaining Greyhounds As Pets (GAP) adoption numbers as the number of dogs that need re-homing outweighs the number of people who are aware of the possibility of, and willing to, adopt. Any reduction in the number of greyhounds, however, ultimately leads to less races which reduces the revenue the industry receives.

A focus on improving the social licence of the sport would improve the industry's chances of developing other revenue streams such as sponsorships and create a more sustainable environment.

## The aggregation of significant prizemoney among a small number of participants

Greyhound Racing SA makes over 14 million dollars in prizemoney available annually to approximately 1435 participants. This amounts to around 53% of the annual revenue. Due to the professionalisation of the sport, at present, a high percentage of racing greyhounds are trained by a small group of full-time participants. Greyhound Racing SA was unable to provide accurate data to this Review as to exactly how many greyhounds these trainers have. This highlights the need for GRSA to urgently adopt a full traceability system such as the eTrac technology being used in New South Wales. This aggregation of greyhounds with limited trainers means that the majority of prizemoney is paid to this small trainer cohort.

This aggregation of greyhounds among too few participants also means that these trainers are positioned to exert significant influence on the industry, as the industry is dependent on these trainers to supply greyhounds for races. This, in turn, places pressure on the industry when interacting with these trainers. This Review did not find any proven examples of any special treatment being given to these trainers - although there have been reports received of some dominant trainers behaving poorly and those behaviours not being addressed. This Review found that the industry is implementing policies to provide opportunities to trainers with smaller numbers of greyhounds, such as an increase in the number of lower grade races to provide prizemoney to less competitive greyhounds.

Race fixing is also a risk consideration when one trainer has several greyhounds competing in the one race. Currently the industry does not have a capability to investigate race fixing to an adequate level to address this risk.

Overall, the industry needs to consider whether it is healthy for such a large concentration of greyhounds to be in so few hands, given it is so heavily reliant on them.

## The age profile of industry participants

The age of participants is also an issue for the industry. The Review was orally informed that the predominant age group of participants is 60 to 80 years of age. Most of the younger participants are related by family to older participants, meaning the industry is attracting few new, younger participants. The outlook for attracting younger participants is not positive given pressures being publicly placed on the industry and in 10 to 15 years if the situation remains as is, it is likely that racing greyhound ownership will be limited to fewer participants than those active today. This environment would mean that larger professional trainers with many greyhounds would continue to be the norm. In short, it is likely that the industry will have to make decisions about its operating model going into the future.

## Animal welfare and re-homing programs

Animal welfare is the primary issue affecting the ongoing viability of greyhound racing in South Australia. The inquiry received 592 submissions from individuals and lobby groups primarily advocating that greyhound racing be discontinued based on animal mistreatment. Many of these submissions have been supported by detailed first-hand experiences by persons who have been involved in the industry. This Review also received submissions from within the industry itself which detailed its efforts in endeavouring to maintain high standards of animal welfare. This Review sought to understand animal welfare from both a legal point of view, and the perspective of the general community, who in effect provide the 'social licence' for the sport's ongoing viability.

Social licence - as a concept - is discussed later in this report. While detail is provided later, it is worth noting that the trust element of the social licence provided to greyhound racing in SA, has been significantly eroded amongst the general community because of recently publicised animal cruelty cases within the industry.

On track injuries (including fatalities) was an area that was examined in detail, including interviewing several highly qualified veterinarians and obtaining detail on how on track injuries occur. In 2022-23, 31 greyhounds died or had to be euthanised either on track or due to track injuries. Greyhound Racing SA publish fatality data as a total number and injury rates as a percentage based on the number of races conducted. These injury rate data sets are misleading because they are based on the number of races conducted rather than the number of individual greyhounds. The reality is that almost all greyhounds that race for any length of time are going to incur injuries at some point. This can range from minor muscular injuries to more significant bone fractures and breaks.

Nobody involved in the industry wants to see injuries to greyhounds and the Review heard of race day stewards and kennel staff being distressed at dealing with injured greyhounds. Race day officials including veterinarians also go to lengths to ensure injured greyhounds are not put down at the track unless it is absolutely necessary and in the best interests of the animal.



An examination of the available data shows however that there is a practise of greyhounds being euthanised within 48 hours of an on track serious injury that might otherwise be considered amenable to treatment through surgery or other means. This was confirmed by veterinary experts who spoke of experiencing pressure from some race day participants to euthanise their greyhounds at the track. For this to be addressed, the GRSA needs to have a greater role in the management of seriously injured greyhounds to ensure that they receive the necessary veterinary treatment. Any pressure being placed on veterinary staff or stewards should be regarded as a disciplinary offence.

The Review found that several measures can be taken to significantly reduce on track injuries, namely, more straight track racing, racing on softer track surfaces, more six dog fields, dual lures and preferential box draws (most being trialled currently). That stated, general injuries of a more minor nature such as muscle soreness, are a part of any sport and unlike thoroughbred and harness racing, greyhounds are not being ridden or driven by human beings. They are running on instinct due to a desire to chase, an instinct that has been honed through training. However, because the industry is providing a mechanism where greyhounds are given the opportunity to run at speed, it has an ethical responsibility to ensure that the racing conditions are as safe as possible. Serious injury to a greyhound due to racing should be regarded as a failure of the system and consequently reviewed and actioned.

Methods of training racing greyhounds are in the main quite traditional with many participants adopting methods that were practiced by their predecessors or training mentors. Accordingly, it could be argued that this has created an insular environment where there is now a gap between how a significant number of training greyhounds are being kept and trained, as compared to community expectations as to how these things are, or should be, occurring. This is a significant matter, because gaps between current practices and community expectations creates the greatest risk to the social licence for the sport's continuance.

This Review visited a number of training facilities and met with a number of trainers both during arranged inspections, and at race meetings. The people involved in the main present as respectful and courteous individuals who put significant work into their greyhounds, many on a full time or semi-full time basis. A number of trainers have significant financial investment in their greyhounds

and their economic well-being is industry dependent. It is not unusual for trainers to have retired greyhounds as pets in their homes as well as in their kennels. The greyhounds inspected presented as fit and healthy and their kennelling facilities were mostly hygienic with the noted exception of many spiderwebs which can result in spider bites to a confined animal. The kennel houses were mostly darkened sheds with temperature controls and the feeding regimens appeared suitable. Once a day on average, but sometimes more regularly, greyhounds are taken outside and placed in an outdoor kennel while their facilities are cleaned. They are then taken back to their indoor kennel. They are outside in the fresh air for approximately 30 minutes a day although there is no standard for this and for most greyhounds their free movement was limited. There are of course many exceptions to this regimen, but this was the most common standard presented during the Review's inspections.

A few trainers also expressed a view that greyhounds only need to be run once a week when racing and that the rest of the week they should be kept under 'quiet' conditions in their kennel.

The greyhound racing oversight body in New South Wales known as the Greyhound Welfare and Integrity Commission (GWIC) has considered the issue of training conditions of greyhounds. GWIC has determined that greyhounds require free exercise opportunities during the day. It would be fair to say that this would be similar from both a greyhound welfare perspective as well as a broader community expectation. In their publication, entitled NSW Greyhound Welfare Code of Practice, it states that among other welfare standards, greyhounds require no less than 30 minutes of free exercise opportunities per day, either in the form of free play outside the housing area, or being walked on a lead. Currently this is not a requirement in South Australia.

It is clear from both an ethical standpoint and greyhound welfare perspective that greyhounds should be provided free run opportunities in line with GWIC's requirements. There are numerous other standards in the GWIC Code of Practice that are also essential to ensure that animal welfare practices meet community standards and expectations. It is therefore a recommendation of this Review that a number of GWIC's animal welfare policies be introduced in South Australia. Compliance with these policies would place a greater emphasis on a greyhound's overall well-being, as well as their physical fitness and health.

It would mean that a greater focus would be placed on the greyhound receiving greater enrichment opportunities in its everyday environment. This would mean substantial change for many current trainers and will represent a significant departure from many of their current training programs, however, this disruption would not necessarily be fatal to their endeavours. Indeed, welfare considerations such as enrichment, should be considered the priority over generally accepted training techniques.

The Greyhound as Pets program (GAP) has the intention of re-homing retired greyhounds into the community. The stated position of GRSA is that 100% of greyhounds should be re-homed. In 2022 GAP rehomed 526 greyhounds and in conjunction with re-homing by trainers and other adoption groups, the total number of re-homed greyhounds for the year is far greater. What is not included in this number is the return rate of greyhounds who are unsuccessfully re-homed and are returned to GAP. This is believed to be around 25%, however this figure is difficult to calculate given some greyhounds are returned more than once. The Review met with staff from GAP and found them to be dedicated people with the interests of greyhounds as their priority. There are however a range of reasons why re-homing greyhounds is becoming a very difficult task.

Firstly, there is a need for greater controls over the number of greyhounds being bred. To address this, GRSA as the controlling body, should set a maximum number of greyhounds which can be bred each year. This number should be informed by the backlog of greyhounds awaiting re-homing. Currently, GRSA are endeavouring to educate breeders as to what that number of greyhounds should be bred each year, however, there does not appear to be a firm number in this regard. Greyhound Racing SA currently state that sustainable breeding levels are approximately 500 greyhounds per year. Based on the current pressure being experienced by GAP, this Review considers that this GRSA assessment may be too high. There has

been no evidence produced to the Review that any mathematical rigour has gone into this calculation. Rather, it appears to be an assessment based on the experience of GRSA.

Each year GAP have a re-homing target set by GRSA which is based on an assessment of the number of greyhounds they expect to be available for re-homing. It would be preferable if a hard number was set for the maximum number of greyhounds being bred based on GAPs capacity to re-home each year. This would be a more efficient model and place less pressure on the GAP service.

Secondly, GAP is having difficulty finding sufficient homes for greyhounds. It is widely believed that during the pandemic many Australians took in pets of various types. Now there would appear to be a glut of pet availability and a shortage of demand. This means that despite the best efforts of the GAP staff, there is a growing backlog of greyhounds awaiting adoption. Currently this number is believed to be at least 186. Unless a substantial investment is made in GAP, it is at risk of failure in its efforts. This current pressure on GAP has the risk of leading to poor decisions on re-homing greyhounds and may be a reason for the high turnover of staff. Some examples of poor practices within GAP have been provided to the Review by some of these former staff. The most realistic means of reducing the pressure on GAP is to reduce the number of greyhounds moving through the system.

The GAP greyhounds awaiting re-homing or foster care placement are being housed at leased/rented holding facilities and at trainers' kennels around the state. At the time of writing this Review, 186 greyhounds were at this stage of the adoption process. The Review visited one of the facilities where these dogs were held. It consisted of a kennel facility (shed) which was kept dark. It housed around 30 greyhounds kept in cyclone wire type kennels. Once a day they are removed from their kennels and placed in a separate outdoor kennel

whilst their kennel is cleaned and are then returned to their kennels. It is unclear whether these dogs receive any free run opportunities or how often. It is also unclear how long these dogs are kept under these conditions awaiting re-homing via a foster carer, but in some cases it can be months. The reasons given for dogs being kept in darkened conditions was to quieten them in preparation for them being re-homed. This is not regarded as being necessary by GWIC who believe that free run opportunities and enrichment activities are the best method by which to prepare greyhounds for re-homing.

The manner in which greyhounds are being kept pre-rehoming is well below general community expectations. While these animals presented as physically healthy, it is very difficult to comprehend how keeping them in these current conditions makes them more suitable as pets. In New South Wales, the greyhound racing authorities have constructed purpose-built facilities to house greyhounds that are awaiting re-homing. These facilities provide large open-air pens in which greyhounds have free run opportunities and can access sheltered kennels as they choose. Greyhounds are also provided with enrichment opportunities. Such requirements should be urgently normalised in South Australia given the substantial number of greyhounds awaiting adoption and the length of time for which they might be waiting for a home.

The Greyhounds As Pets Program does very worthwhile work and has a range of excellent programs such as the GAP Prison Program and greyhounds as companion animals in numerous sectors. Greyhounds also do make excellent pets. It is important that their work is not undermined by a lack of investment in appropriate facilities for these animals. Greyhound Racing SA have advised the Review team that they have recently purchased land in country South Australia, and it may be used for this purpose. The need for a proper GAP holding facility akin to that in New South Wales is urgent. Standards for these facilities set by GWIC should be adopted by GRSA.

Greyhound Racing SA also employ welfare compliance officers who conduct physical inspections of facilities where greyhounds are bred, trained and kennelled. There has been considerable staff turnover within this team as there has been within the GAP team over the past two years. This Review observed the inspection team conducting its work, which is generally done in a consultative manner, with licence holders. They exercise their regulatory powers to enter training premises and ensure that welfare issues are being considered. This team were dedicated in their work but are hampered by a lack of staff. The Review also heard from former welfare staff who became discouraged by the lack of enforcement action taken against non-compliant participants, or when inquiries were held and penalties were imposed, yet had no deterrent effect.

More staff are required to meet GRSA inspection needs. The team currently endeavour to inspect each trainer's kennel at a minimum once each year. This requirement needs to be expanded to visiting the locations of all retired greyhounds re-homed outside of the GAP program. This is necessary to ensure that greyhounds are being properly accounted for while being re-homed. These greyhounds are bred for racing and the industry has an ethical responsibility to ensure all greyhounds are re-homed successfully.

A further recommendation is that the welfare inspection team has a direct reporting line to the General Manager, Integrity and Welfare. Currently there is a Welfare and Re-homing Manager covering both functions. This manager should be wholly focussed on GAP priorities including working with trainers on how to prepare their greyhounds for re-homing. The General Manager Integrity and Welfare would then have a more direct line of sight over welfare matters. Greyhounds As Pets program and welfare inspection are two very separate and distinct functions. Greyhounds As Pets require a very collaborative approach with trainers, whereas the Welfare Inspectors are tasked with ensuring trainers are properly educated on, and are adhering to, the relevant standards.

The Review examined several case studies relating to the welfare of greyhounds. A number of those are included in this report. It can be concluded from those case studies that GRSA is not adequately or effectively enforcing its own Animal Welfare Policy or the serious welfare provisions contained in the national rules against its participants.

Several of these case studies warranted a report being made to the RSPCA due to possible breaches of the *Animal Welfare Act 1985*. However, no referrals were made by GRSA in any of the case studies. GRSA's failure to report serious incidents of ill-treatment of greyhounds to the RSPCA is contrary to their stated aim of prioritising greyhound welfare and calls into question its suitability as the Controlling Authority of greyhound racing.

Prior to this Review being commissioned, the footage of greyhounds being physically beaten was a shock to the public, and prompted the government's response to inquire further as to how prevalent such issues are in this industry. Having now reviewed the animal welfare related matters that have not been disclosed to the public in the form of published outcomes or reported to the RSPCA, that footage does not seem shockingly out of place when viewed in the context of other serious incidents of greyhounds being poorly treated – the only difference being that the footage was in the public realm.

Given the change management program that the industry must go through following this Review, it is also the opinion of this Review that the welfare inspection function should report to an independent inspector referred to below. This is to ensure community confidence in the welfare aspects of this reform.

## The future

It is the conclusion of this Review that there is an urgent need for the greyhound racing industry in South Australia to reform if it is to meet contemporary community expectations. These reforms are considerable and are dominated by greyhound welfare concerns including the sustainability of the GAP program. The industry generates significant funding which flows into the economy of the state and employs many people. Some of these people derive their full-time income from the sport as well as having made significant investment into it. If the sport is to retain a social licence into the future, it will only be achieved if the reforms recommended in this report are immediate and widespread.

In 2020, GRSA appeared before a government committee dealing with the Statutes, and Amendments (Animal Welfare Reforms) Bill 2020. In giving evidence before that committee GRSA undertook to improve its performance on a range of issues covering the governance of the industry. Based on the findings of this Review, GRSA has not sufficiently delivered against this commitment. In 2017, GRSA commissioned its own review into governance, welfare and integrity. Known as the McGrathNicol report, this GRSA commissioned review made many sound recommendations for reform, however, many of these reforms were not implemented. This raises the issue of transparency and the need for independent oversight of any future reforms.

South Australia is one of only two Australian states that does not have independent oversight of its racing codes. Tasmania is currently implementing the results of a similar review to this one, which includes recommending oversight. This is reflective of a broader view that industries that provide both governance



and regulatory functions require the checks and balances provided by independent oversight. Before the Government considers the various models of independent oversight however, there is an interim step that is necessary. This Review is persuaded by the RSPCA's submission, where at recommendation one they state:

***“Unless the significant, entrenched animal welfare problems inherent to the greyhound racing industry can be recognized and effectively resolved, this industry should not be supported.”***

Animal welfare issues identified in this Review need to be urgently improved before government can be better assured that the industry should continue in its current form. It is only if these reforms can be successfully undertaken that government should consider longer term oversight models.

It is therefore recommended by this Review that a reform period of two years be allocated, and that this reform be oversighted by an Independent Inspector, with reporting functions to Government. Only if this Inspector is satisfied after a period of two years that reforms have been achieved, would this Review recommend a long-term continuance of the industry with an oversight model considered best practice at that time. The role of a Greyhound Industry Reform Inspector (GIRI) should have the following features:

The GIRI should have unfettered access to GRSA systems and data to inform this work.

- The GIRI should be entirely independent of the industry and this Review.
- A Greyhound Racing Reforms Advisory Group should be formed to provide professional advice to the GIRI regarding reform progress. The skill sets of this group should comprise:

- Animal welfare expertise (independent of greyhound racing)
  - Gambling regulation expertise
  - Greyhound industry experience
  - Sports regulation experience
  - A community representative
- The General Manager, Integrity and Welfare at GRSA should have a dual reporting line to the GIRI. The reporting line to the GIRI is not to cover management of the welfare function, but to report on relevant welfare matters relating to the reform program to the GIRI.
- The GIRI should determine the frequency and mode of reporting that they receive from GRSA as to reform progress.
- The GIRI should report on a regular basis to the Minister for Racing as to reform progress, and ultimately provide a final report after two years as to their level of satisfaction with the status of the reforms. If a decision is made to continue greyhound racing at that point, the GIRI should express a view as to the most appropriate oversight model into the future.

The two year review period should commence from the time of the appointment of the GIRI.

Finally, it would be disappointing if these reforms were hampered by any cultural barriers within the industry. Greyhound owners and trainers have informed this Review that they love their dogs, and this Review has observed instances that support that statement. This, however, is their opportunity to demonstrate to the community that animal care practices within the industry can meet overall community standards and that greyhound welfare is first and foremost in their priorities. Similarly, a constructive, transparent and positive approach by the industry's controlling authority will also greatly assist the development of public confidence in their sport.



# Consolidated Report Recommendations

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## Recommendation 1

The Terms of Reference for the Integrity Welfare Committee be amended such that members of the Integrity Hearings Panel cannot also sit on the Integrity Welfare Committee, to ensure the functions of the IWC and IHP are free from any potential conflicts.

## Recommendation 2

The duties and responsibilities of the Board in relation to integrity and welfare be included within “Accountability” at point 4 of the Board Charter to bolster the importance of the IWC’s reporting function to the Board and the IWC Minutes be added as a standing item on the Board’s Agenda.

## Recommendation 3

GRSA to amend its Constitution and Board Charter to:

- clearly outline the Board’s role in driving and upholding integrity within the greyhound racing industry in South Australia, and
- redefine the objects of the company to better reflect the functions of GRSA as the controlling authority for greyhound racing.

## Recommendation 4

GRSA adopt and implement McGrathNicol’s recommendation with respect to periodic declaration of private interests and periodic probity statements by the Board.

## Recommendation 5

GRSA develop and implement a Steward’s Manual addressing the elements listed above identified by McGrathNicol with version control.

## Recommendation 6

GRSA amend the Integrity (Betting & Ownership) Policy to implement the McGrathNicol recommendations with respect to:

- Prohibiting stewards from wagering, either directly or indirectly, on greyhound racing events anywhere in Australia, not just South Australia.
- Requiring all stewarding staff to submit an annual betting declaration identifying:
  - Compliance with the Integrity (Wagering, Ownership and Gaming) Policy or any exception to compliance
  - Details of all wagering accounts held in the steward's name
  - Details of any wagering accounts in someone else's name but via which the Steward has placed a bet during the year.

## Recommendation 7

In addition, that GRSA undertake a Review/audit of betting declarations by requesting the wagering providers details of any betting accounts in the name of the stewards and requesting details of any other account identified in the declarations.

## Recommendation 8

GRSA to develop and implement a staff code of conduct to provide its employees with clear instructions about what they can and can't do in the workplace, including ethical obligations, values, accountability, standard of conduct, standard of practice, and disciplinary procedures.

## Recommendation 9

That the GRSA Staff Conflict of Interest Policy be expanded to require all actual, perceived or potential conflicts of interest to be declared by staff with associated documentation developed and implemented for declaration and management of

conflicts, as well as a conflict of interest register created and maintained by GRSA.

## Recommendation 10

GRSA adopt and implement McGrathNicol's recommendation in relation to declaration of private interests for all senior management and integrity related personnel.

## Recommendation 11

Implement a gifts and benefits policy which expressly states that GRSA employees:

- must not seek or accept gifts or benefits for themselves or others that could reasonably be perceived as having the potential to influence them in the performance of their duties and functions as a GRSA employee; and
- requires any non-pecuniary gifts or benefits offered to employees by persons external to GRSA to be declared in a register that is maintained by Human Resources.

## Recommendation 12

GRSA, in consultation with an on-track vet(s), develop and document an on-track vet folder similar to Greyhound Racing Victoria.

## Recommendation 13

GRSA finalise its documentation of all swabbing and sampling procedures.

## Recommendation 14

GRSA to document their internal policy outlining their approach to swabbing and sampling (acknowledging its sensitivity) for review by General Manager, Integrity and Welfare, including targeting of participants subject to suspended suspensions for prohibited substance outcomes.



## Recommendation 15

GRSA replace the KnowTellProtect webpage with a prominent “Contact GRSA” webpage with separate forms for:

- Reporting animal welfare concerns, suspicious behaviour or any other unlawful conduct relating to greyhounds and the greyhound racing industry
- Making a complaint or providing feedback about GRSA or its staff
- Submitting a media enquiry
- Submitting a general enquiry

Each avenue for contacting GRSA should auto-generate an appropriate acknowledgement from GRSA with details regarding timeframes for consideration of the same and when a response can be expected.

## Recommendation 16

GRSA implement a procedure for managing complaints regarding animal welfare and other unlawful conduct to ensure they are actioned in a timely manner by the appropriate branch within GRSA. All reports/complaints of that nature should be tabled at the Integrity Welfare Committee meetings to identify trends and ensure they have been actioned appropriately.

## Recommendation 17

That GRSA employ a betting analyst to provide up to date intelligence to stewards on integrity risks identified through betting patterns.

## Recommendation 18

GRSA introduce a local rule prohibiting participants from lay betting on any greyhounds racing at South Australian tracks.

## Recommendation 19

It is recommended that a human resources review be conducted in consultation with staff to determine the optimum staff number of stewards engaged by GRSA. These staff should then be recruited.

## Recommendation 20

GRSA should ensure a person representing GRSA is available to participants at race meetings to ensure stewards can focus on their core functions.

## Recommendation 21

Stewards should only record significant interference on stewards’ reports and append video footage of the race to the steward report.

## Recommendation 22

GRSA should incorporate hair testing as a more regular feature of their drug testing environment. Targeted out of competition testing by using hair samples should also be increased.

## Recommendation 23

Analysis of positive swabs should be conducted to provide trend data to stewards which can inform future targeted testing and industry education.

## Recommendation 24

GRSA publish a quarterly analysis of greyhound injury data in the same manner as GWIC. This analysis must be published to the community.

## Recommendation 25

GRSA implement the following track safety initiatives:

1. Preferential dox draws based on GPS data.
2. Use of double arm lures.
3. Increase in the number of 6 dog races.
4. Continued development of or acquire an off the shelf consistent measuring tool for establishing the safest surface density.
5. Increase in straight track racing.
6. Establishment of GWIC style quarterly racetrack injury report.
7. Establishment of a race injury Review panel as per the NSW model.
8. Injury analysis to include injury by greyhound trainer.
9. Development of education program for trainers who have a high prevalence of injured greyhounds.
10. Greyhounds returning from long layoffs to be required to be the subject of a veterinary clearance pre-nomination.

## Recommendation 26

GRSA conduct a Review to determine any links between racetrack injuries and locations of starting boxes on the tracks in South Australia.

## Recommendation 27

Injuries to greyhounds during trials should be properly recorded and published by the industry.

## Recommendation 28

GRSA review the staffing levels in the welfare team to ensure it is properly resourced to achieve a proactive function.

## Recommendation 29

GRSA engage the services of an analyst to assist the proactive targeting capability of the welfare team.

## Recommendation 30

The welfare function of GRSA should have a dual reporting line to both the GRSA Executive/Board and the independent inspector recommended in this Review to oversee industry reforms.

## Recommendation 31

Greyhound Racing SA to review format of Inspection record to require date of last inspection, more descriptive answers and include important questions which were previously asked in relation to care and management of property, cleaning and feeding regime, exercise regime, description of kennels and require photographs of non-compliant items to be inserted at relevant points as evidence and future reference.

## Recommendation 32

That the Premises Inspection/Greyhound Audit template should require the inspector to record how many dogs are registered against the participant prior to the audit being carried out and how many dogs were located at the premises and require an explanation to be recorded for any discrepancy (in addition to the microchip audit).

## Recommendation 33

Government to consider, in the context of the review of the *Animal Welfare Act 1985*, to mandate the controlling authority for greyhound racing to report suspected breaches of the Animal Welfare Act and Regulations to the RSPCA.

## Recommendation 34

Chief Inspector of the RSPCA (or his/her delegate) to meet regularly (minimum 6 times per year) with General Manager, Integrity and Welfare, GRSA to discuss all animal welfare investigations and complaints received, to identify any matters that should be referred to RSPCA for investigation, as well as any participants leaving the industry. All matters that are referred must be in writing and a record kept by both authorities.

## Recommendation 35

Government should consider allocating funding to appoint a full-time animal welfare officer at the RSPCA dedicated to greyhound welfare.

### Recommendation 36

Greyhound Racing SA to consider amending the Local Rules and formalising an MOU with the RSPCA to ensure necessary information sharing can occur.

### Recommendation 37

GRSA must publish all outcomes of Steward Inquiries or IHP hearings that have not been published before 1 January 2024.

### Recommendation 38

The Greyhound Industry Reform Inspector is to be consulted before any welfare-related investigation is to be closed with no charges laid.

### Recommendation 39

GRSA to adopt the minimum space requirements for greyhound housing areas as outlined in Part 5 of the NSW Greyhound Welfare Code of Practice.

### Recommendation 40

GRSA Animal Welfare Policy 2021 should be amended to make expanded and specific reference to tethering. A policy position should be that greyhounds are only to be tethered for the minimum practical time and for no more than two hours. If a greyhound is tethered for any period of time, it should be provided access to water.

### Recommendation 41

GRSA should adopt the following policy regarding pest control in both indoor and outdoor kennel facilities:

Safe and effective measures must be taken to control pests and vermin (including fleas, ticks, flies, mosquitoes, spiders, snakes and rodents) in greyhound housing areas.

Pest control chemicals must be kept in their original container and used and stored in accordance with the manufacturer's instructions.

Greyhounds must be removed from any areas where and while noxious pest control chemicals are being used.

### Recommendation 42

The existing GRSA exercise, socialisation and enrichment recommendations contained within the GRSA Animal Welfare Policy 2021 be augmented with the inclusion of the following requirements covering greyhounds in training and racing:

Greyhounds in training or racing must be provided with at least 30 minutes of free exercise per day, in the form of either free play outside the housing area, or being walked on a lead, and provided access to toys.

### Recommendation 43

The existing GRSA exercise, socialisation and enrichment recommendations be given mandatory status and non-compliance should constitute a disciplinary offence.

### Recommendation 44

GRSA urgently enforce its own Animal Welfare Policy 2021 in respect of:

- greyhounds awaiting foster placement or re-homing;
- retired greyhounds retained by participants; and
- spelling greyhounds.

### Recommendation 45

GRSA acquire a stand-alone facility to house greyhounds under their care and provide care for GAP greyhounds in line with their own policies.

### Recommendation 46

Standards enforced by GRSA under its Animal Welfare Policy be upgraded from recommendations to mandatory requirements. Failure to adhere to these requirements should result in disciplinary action being taken.

### Recommendation 47

Greyhound Racing SA immediately ban the use of Surgical Artificial Insemination in the South Australian Greyhound Industry. Any participant who knowingly utilises this method of breeding either directly or indirectly should be the subject of a disciplinary offence.

## Recommendation 48

The IHP/Stewards must ensure that prohibited substance Inquiry outcomes are published with details of and having regard to:

- The name of the Steward or IHP member(s) who determined the matter
- The names of the greyhound(s) involved and their placing
- How the sample or swab was taken (urine, blood or hair sample) and the relevant concentration
- The category of substance by reference to the penalty guidelines
- What effect the nature of the prohibited substance is known to have on the performance of the greyhound
- Whether the registered person pleaded guilty or was found guilty
- The person's disciplinary history and registration history
- Circumstances of the offence
- Whether the registered person profited from the conduct in terms of betting winnings
- The degree of remorse
- The need for personal and general deterrence
- The penalty guidelines and the basis for any departure from the guidelines (if applicable).

## Recommendation 49

Once the potential conflict between IWC Chair and IHP Chair is addressed, the IWC should regularly review penalty outcomes to ensure they align to penalty guidelines and serve as an adequate deterrent to industry.

## Recommendation 50

GRSA to develop a Rehoming and Euthanasia Obligations Factsheet which clearly outlines participants' obligations consistent with the GAR and Local Rules that is easily accessible and distributed to participants.

## Recommendation 51

GRSA to urgently review Local Rule 130 to address a potential loophole for greyhounds retired to registered persons to be euthanised.

## Recommendation 52

GRSA must ensure their investment in the GAP program marketing is sufficient given the challenges with re-homing greyhounds in the current climate.

## Recommendation 53

That GRSA cease setting GAP annual targets for re-homing greyhounds.

## Recommendation 54

That GAP conduct a transition audit of retired and non-raced greyhounds ahead of acquiring eTrac and publish the results of that audit.

## Recommendation 55

Greyhound Racing SA should consider placing a cap on allowing interstate bred greyhounds into the State unless there is a plan in place to re-home that greyhound in the home state.

## Recommendation 56

Government conduct analysis to determine the appropriateness of allowing GRSA to retain an increased share of Point of Consumption Tax (POCT) to assist funding improved welfare conditions in the industry.



## Recommendation 57

Government to establish the role of an independent inspector for greyhound racing reform, to be known as the Greyhound Industry Reform Inspector, (GIRI) which should include the features, functions, and duties set out below.

- The GIRI should have unfettered access to GRSA systems and data to inform this work.
- The GIRI should be entirely independent of the industry and this Review.
- A greyhound racing reforms advisory group should be formed to provide professional advice to the GIRI regarding reform progress. The skill sets of this group should comprise:
  - Animal welfare expertise (independent of greyhound racing)
  - Gambling regulation expertise
  - Greyhound industry experience
  - Sports regulation experience
- The General Manager Integrity and Welfare at GRSA should have a dual reporting line to the GIRI. The reporting line to the GIRI is not to cover management of the welfare function, but to report on welfare matters to the GIRI.
- The GIRI should determine the frequency and mode of reporting he/she receives from GRSA as to reform progress.

The GIRI should report on a regular basis to the Minister for Racing as to reform progress, and ultimately provide a final report after two years as to their level of satisfaction with the reform progress. If a decision is made to continue greyhound racing at that point, the GIRI should express a view as to the most appropriate oversight model going forward.

**The following recommendations were submitted by GRSA and have been accepted, noting there may be some duplication with recommendations made by the Review.**

### GRSA Recommendation 1 accepted

That GRSA work in partnership with Controlling Bodies to create a unified and standardised approach to licensing within the greyhound industry including defining the necessary education, training, and skill requirements for different roles held by licensees.

### GRSA Recommendation 3 accepted

To ensure the presence of an on-track vet at any licensed race that the *Authorised Betting Operations Act 2000 (SA)* be amended such that:

section 36 of that Act makes it a mandatory condition of any licence authorising a racing club to conduct on-course totalisator betting in conjunction with a race meeting held by the Club only occur if a Veterinarian registered under the *Veterinary Practice Act 2003 (SA)* is present with a penalty to the controlling club and its officers in the event of a breach of the condition.

section 36 of the Act makes it a mandatory condition of any licence that the racing club provide an annual report to the Minister for Racing in respect of its compliance with the condition set out above.

### GRSA Recommendation 4 accepted with changes

GRSA to work on developing a more collaborative relationship with the Dog and Cat Management Board to strengthen their partnership concerning the registration of greyhounds. This includes registrations for both as canines and breeding, with the goal of simplifying the greyhound registration and tracking process within the DACO database.

### **GRSA Recommendation 5 accepted**

Revise the Local Rules and Animal Welfare Policy of GRSA to explicitly state that all greyhounds, including those intended for breeding, must be registered with the Dog and Cat Management Board. This requirement applies to both new greyhound registrations and those approved for breeding purposes.

### **GRSA Recommendation 8 accepted**

GRSA continue to develop a complaint and intelligence management application to enable better tracking and sharing of information and intelligence across GRSA and other state Controlling Bodies.

### **GRSA Recommendation 9 accepted**

GRSA move from the *Know Tell Protect* initiative to a more independent and secure platform similar to Crime Stoppers, such as *Safe2Say*.

### **GRSA Recommendation 13 accepted**

GRSA should continue their good work with greyhounds in the community, by expanding the GAP SA foster program into other prisons, including Mount Gambier.

### **GRSA Recommendation 14 accepted**

GAP SA evolves and improves by exploring alternative fostering and adoption options, including collaboration with third-party (non-GAP SA) rehoming agencies that share a commitment to transparent and ethical animal rehoming practices.

### **GRSA Recommendation 15 accepted**

GRSA to work with Greyhounds Australasia, as facilitator with other Controlling Bodies, to create a unified and standardised approach to licensing within the greyhound industry. This should include defining necessary education, training, and skill requirements for different roles held by licensees.

### **GRSA Recommendation 16 accepted**

GRSA broaden its minimum penalty guidelines to encompass all prevalent and substantial rule violations within the Rules of Racing.

### **GRSA Recommendation 17 accepted**

GRSA implement the eTrac greyhound traceability system.

### **GRSA Recommendation 18 accepted**

GRSA assess and implement accredited training programs to assist stewards and racetrack curation staff to better perform their functions.

### **GRSA Recommendation 19 accepted**

Within its Integrity and Welfare Committee, GRSA should institute a recurring agenda item dedicated to Reviewing all significant racing injuries and on-track fatalities. This measure aims to detect any discernible patterns or factors that could be significant contributing factors to these injuries or fatalities.

### **GRSA Recommendation 20 accepted**

GRSA formulate a binding code of conduct and practice for the greyhound racing sector incorporated into the Local Rules. This code should provide industry-wide guidance on best practices concerning greyhound care, health, and welfare throughout the complete lifecycle of greyhounds.

**The following recommendations were submitted by RSPCA and have been accepted, noting there may be some duplication with recommendations made by the Review.**

### **RSPCA Recommendation 1 accepted**

Unless the significant, entrenched animal welfare problems inherent to the greyhound racing industry can be recognized and effectively resolved, this industry should not be supported.

### **RSPCA Recommendation 3 accepted**

Adopt a vetting process to ensure that members appointed to boards and regulatory bodies do not benefit from an affiliation with the greyhound racing industry.

### **RSPCA Recommendation 6 accepted**

Implement ongoing investigation and surveillance for live baiting and other serious animal welfare offences and enforce strong penalties for animal welfare offences.

### **RSPCA Recommendation 7 accepted**

Increase the monitoring and application of penalties for the use of banned substances. The risk of disciplinary actions must provide more incentive to curb their use.

### **RSPCA Recommendation 9 accepted**

Prohibit the routine use of surgical artificial insemination (AI). It is highly invasive, causes significant pain to female dogs and is already banned in some EU countries.

### **RSPCA Recommendation 14 accepted**

Implement a mandatory birth to death traceability system that tracks the circumstances, location, ownership and fate of individual greyhounds throughout their life cycle.

### **RSPCA Recommendation 15 accepted**

Verify all third-party adoptions (i.e., adoptions not through organisations like GAP) and follow up those that are genuine.

### **RSPCA Recommendation 19 accepted**

Mandatory requirement for GRSA representatives to report animal welfare issues (and participants leaving the industry) to RSPCA.

### **RSPCA Recommendation 22 accepted**

GRSA's Board should include a member(s) with specific animal welfare expertise, given that this is an animal business.

### **RSPCA Recommendation 24 accepted**

Requirement for industry participants to undertake training in animal welfare.

**The following recommendations from the Animal Justice Party submission were accepted.**

### **AJP recommendation 3 accepted (with respect to greyhound welfare)**

Prioritise the welfare of human and non-human animals over the revenue generated by the greyhound racing industry.

### **AJP recommendation 7 accepted**

Actively pursue prosecution for any and all breaches of the *Animal Welfare Act 1985 (SA)* perpetrated by members of the greyhound racing industry.

### **AJP recommendation 8 accepted**

Introduce, and enforce, a cap on breeding of greyhounds.

### **AJP recommendation 9 accepted**

Introduce whole-of-life tracking to monitor the welfare of greyhounds in the industry.

### **AJP recommendation 13 accepted**

Amend Freedom of Information legislation to ensure that there are no exemptions applicable to the racing industry.



# History of sport and events leading to this Review

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As background, the following three paragraphs were provided by GRSA in their submission and acts as historical information to the background of the greyhound racing:

*Greyhound racing has been a popular pastime in Australia for many years, with its origins dating back to the early 20th century. Like other states, South Australia played an essential role in the evolution and popularity of the sport in the country by transforming the sport into a vibrant and organised activity that continues to develop today.*

*The origins of greyhound racing in South Australia can be traced back to the mid 1800's, where colonists moved from keeping greyhounds for hunting to informal races held in various parts of the state, originating in Naracoorte. These early events often occurred on straight tracks in rural settings, where locals would gather to race their dogs for leisure and occasionally place bets.*

*Over the years, as greyhound racing began to gain popularity across Australia, there was a growing demand for more formalised racetracks and organised events in South Australia. By the mid-20th century, several registered racetracks emerged, catering to the ever-increasing appetite for the sport.*

Greyhound racing in South Australia, through its development, is today controlled by a company known as Greyhound Racing SA Pty Ltd (GRSA). The shareholders of this company are the five clubs that operate today, namely Angle Park, Gawler, Murray Bridge and Mt Gambier and the Greyhounds, Owners Trainers and Breeders Association SA. Greyhound Racing SA is responsible for running the race meetings at these tracks and provide stewards for this purpose, and the racing is conducted under GRSA rules.

Over recent years, greyhound racing has come under increased scrutiny for its animal welfare record from a society that has progressively shifted in its views regarding such matters. This has included highly publicised cases where animal abuse has been visually recorded and made available to the public. In South Australia there have been two key events which were subject to significant media coverage (which were, and are, being investigated separately to this Review) that revealed to the community that these issues are occurring in this state.

Following the second of these incidents, South Australian Premier, The Honourable Peter Malinauskas MP announced that a review would be conducted into the industry. Terms of reference for that review are included in this report. The Review was led by Mr Graham Ashton, AM APM and supported by a Review Director, Ms Zoe Thomas. The Review was also ably supported by staff from the Office for Recreation, Sport and Racing. The Review was required to report to the Minister for Recreation, Sport and Racing, The Honourable Katrine Hildyard MP. The Review also thanks GRSA for responding to many requests for information.

## Conflict of Interest

A number of submissions made to this Review claimed a conflict of interest existed for the lead Reviewer due to claimed links to the greyhound racing industry in South Australia. Indeed, the Animal Justice Party conducted a leaflet drop to letter boxes in Adelaide stating that the Review was biased based on this claim.

The Reviewer does not have any current day links to the greyhound racing industry, although the Reviewer has an adopted greyhound as a pet in his family. This greyhound was adopted through GAP Victoria. In his youth, the Reviewer was raised in South Australia and his father was a significant figure in the industry at that time up until his retirement from the greyhound racing industry. The Reviewer however, left Adelaide in 1980 and has not been involved in the industry in South Australia since that time.

When conducting reviews in any sector, it is normal, appropriate, and indeed beneficial, for the Reviewer to have knowledge of the industry they are reviewing. For example, if a review was conducted of a media organisation, you would expect that reviewer to have a knowledge of broadcasting. This Reviewer believes he has the requisite knowledge and skills to conduct this Review, as well as sufficient distance from the industry to be independent of mind and judgement.

It is not expected that this statement will be persuasive to some of the people or groups who raised this issue, however it is important for transparency that it appear in this report.



# GRSA as the governing body for greyhound racing in South Australia

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## History and formation

Greyhound Racing SA Limited (GRSA) is designated as the controlling authority for greyhound racing pursuant to section 6 of the *Authorised Betting Operations Act 2000* (ABO Act). The concept of ‘controlling authorities’ was first included in the repealed Racing Act 1976 (Racing Act), which regulated and controlled certain forms of racing and betting. As it then was, the Racing Act included provisions for the constitution, terms and conditions of office, functions, powers and rules for each controlling authority and the appointment of stewards. The first controlling authority was the South Australian Greyhound Racing Board, and later, the South Australian Greyhound Racing Authority.

In 2000, the legislative framework for controlling authorities was changed as a result of the corporatisation of the racing industry, to reflect the racing industry’s preferred model. The Racing Act was repealed and the regulatory framework for gambling and the controlling authorities of the three racing codes moved to the ABO Act, where it remains today.

Greyhound Racing SA Limited was established as a not-for-profit company, limited by guarantee under the *Corporations Act 2001* (Cth). It commenced operations on 25 September 2000 as the controlling authority of greyhound racing in South Australia operating under the company’s constitution.

It is important to note that as a result of the corporatisation of the racing industry, the government’s regulation of the controlling authorities is minimal. Greyhound Racing SA is authorised under the ABO Act to conduct on-course totalisator betting with respect to any race meetings it holds and is therefore a licensed gambling provider for the purposes of the *Gambling Administration Act 2019*. It is worth noting, however, that any disciplinary action taken against GRSA as a gambling provider by the Liquor and Gambling Commissioner only pertains to the gambling operations of GRSA.

The current regulatory scheme implies a continuing responsibility on the part of the Minister to ensure that a racing controlling authority remains appropriate for designation as such under the ABO Act. However, the Act is otherwise silent as to the functions, scrutiny or accountability of the racing controlling authorities in South Australia.

This regime contrasts to legislative frameworks in other jurisdictions. For example, in New South Wales, greyhound racing is regulated by the Greyhound Welfare and Integrity Commission (GWIC) under the *Greyhound Racing Act 2017*. GWIC’s principal objectives under the Act include:

- to promote and protect the welfare of greyhounds;
- to safeguard the integrity of greyhound racing and betting; and
- to maintain public confidence in the greyhound racing industry.

In Queensland, the *Racing Integrity Act 2016* establishes the Queensland Racing Integrity Commission (QRIC) to oversee the integrity and welfare standards of racing animals and participants in Queensland. Some of the functions of the QRIC include:

- administering the relevant licensing scheme;
- managing race meeting integrity and animal testing;
- safeguarding animal welfare and investigating legal compliance;
- reviewing and assessing racing industry practices; and
- providing information and education to promote compliance and integrity.

In Victoria, greyhound racing is governed by the *Racing Act 1958* which established Greyhound Racing Victoria (GRV) and outlines the functions of GRV, which include:

- to control the sport of greyhound racing;
- to promote and monitor compliance with the rules; and
- to promote and improve animal welfare within the sport of greyhound racing.

In Western Australia, greyhound racing is regulated by Racing and Wagering Western Australia (RWVA). The charter of RWVA established under the *Racing and Wagering Western Australia Act 2003* is to foster development, promote the welfare, and ensure the integrity of greyhound racing in the interests of the long-term viability of the racing industry in Western Australia.

The lack of any express regulatory regime in South Australia outlining the government’s expectations of the controlling authority with respect to integrity and animal welfare standards, coupled with the absence of express provisions for the accountability and scrutiny of the controlling authority has - in the opinion of the Reviewer - contributed to some of the issues identified in this report.

It must also be noted that the establishment of the racing code authorities sitting solely within the Act which regulates betting in South Australia has contributed to gambling revenue being the primary focus of the industry at the cost of animal welfare standards.

The issues which the greyhound industry continues to grapple with such as animal welfare concerns, lack of transparency, doping of racing greyhounds, track injuries and rehoming challenges - and the seriousness with which the public views these issues - highlights how inadequate the current legislative framework for greyhound racing is, as it stands today.

The recommendations made with respect to the GIRI and longer-term oversight include the need for the GIRI to outline the preferred legislative framework into the future.

## Organisational Structure

As a company limited by guarantee under the *Corporations Act 2001* (Cth), GRSA is governed by its Constitution, Board Charter and various policies and procedures adopted therein. As a corporation regulated by the Australian Securities and Investments Commission (ASIC), GRSA's officers and senior management must comply with their duties as set out in the Corporations Act.

The various greyhound racing clubs operating as incorporated associations under the *Associations Incorporation Act 1985* (SA) make up the members of GRSA. According to GRSA's constitution, the initial members of GRSA were:

- Port Pirie and District Greyhound Club Incorporated;
- Southern Greyhound Raceway Incorporated;
- Port Augusta and District Greyhound Club Incorporated;
- Northern Yorke Peninsula Greyhound Racing Club Incorporated;
- Riverland Greyhound Racing Club Incorporated;
- Whyalla Greyhound Racing Club Incorporated;
- Mount Gambier Greyhound Racing & Coursing Club Incorporated;
- Greyhound Owners, Trainers & Breeders Association Coursing Club Incorporated;
- Adelaide Greyhound Racing Club Incorporated; and
- Gawler Greyhound Racing Club Incorporated.

Over time, most of the country clubs have been closed. According to GRSA's 2019 Annual report, changes in the racing model made it difficult for non-TAB clubs to remain viable. Port Augusta conducted their last non-TAB race meeting on 29 June 2019 and Strathalbyn held their last race meeting on 21 October 2018 after 47 years in operation. Currently, the remaining members of GRSA are:

- Adelaide Greyhound Racing Club Incorporated
- Mount Gambier Greyhound Racing & Coursing Club Incorporated
- Greyhound Owners, Trainers & Breeders Association Coursing Club Incorporated
- Gawler Greyhound Racing Club Incorporated
- Murray Bridge Greyhound Racing Club Incorporated.

Under its Constitution, GRSA is required to have a Board of six directors nominated by the Directors' Selection Panel, comprising one member appointed by the Chief Executive of the Office for Recreation, Sport and Racing and two members appointed by the Members of the Company (one of whom must be the nominee of a Country Member and the other being the nominee of a Metropolitan Member). The Board must appoint an Independent Director to be Chairman.

The standing items on the Board's Agenda meetings are:

- Action List for SMT
- Items for Decision
- Executive Report from CEO
- Strategic Items
- Finance Items
- Governance Items (IHP and Steward Inquiries updates etc)
- Operations Updates - Welfare, GAP, Marketing
- WHS

The constitution of GRSA establishes the Industry Consultative Group (ICG) which is made up of 6 members representing different roles in the industry (breeder, trainer, owner, wagering, owner trainer). The ICG provides advice to GRSA on industry policy and strategic direction and is a forum for discussion of issues of concern, and a channel of communication between the industry and stakeholders. The Chairman of the Board chairs the meetings and minutes are published on the GRSA website.



## Integrity Welfare Committee

Following a recommendation arising from the McGrathNicol report, the Integrity and Welfare Committee (IWC) was formed in 2018 to provide oversight of GRSA's integrity and welfare functions, and to make recommendations to the GRSA Board on such matters.

The IWC is made up of two independent members appointed by the GRSA Board and a current Board director. Members of the IWC receive remuneration as determined by the Board. Members are required to have general knowledge of the racing industry, its integrity assurance and disciplinary functions, and its welfare framework. The two independent members also sit on the Integrity Hearings Panel (IHP), discussed further below.

According to the Terms of Reference, the IWC's functions are to –

1. Oversee the integrity assurance and welfare functions of Greyhound Racing South Australia and to consult, advise and, where necessary, direct relevant Departments in relation to operational matters.
2. Advise the GRSA Board and make recommendations in respect to –
  - (i) rule-making proposals
  - (ii) integrity policy
  - (iii) welfare policy
  - (iv) participant licensing applications and related procedures
  - (v) resourcing of the integrity assurance and welfare functions, and
  - (vi) any other integrity-related matter.
3. Form the Integrity Hearings Panel (IHP) in order to hear alleged serious breaches of the Rules of Racing and adjudicate on such matters.
4. Advise and report on any other matter referred to it by –
  - (i) the GRSA Board
  - (ii) the GRSA Chief Executive Officer, Chief Operating Officer or Integrity Manager.
5. Liaise with external stakeholders and/or agencies as may be relevant to the proper functioning of the Committee.
6. Review integrity and welfare policy compliance.
7. Otherwise consider and review relevant matters to the integrity and welfare of greyhound racing that the Committee deems appropriate.

The IWC is expected to meet on a quarterly basis or more frequently as the Chair determines, and be convened on other occasions as deemed necessary by the IWC Chairman. A formal agenda is issued, and minutes are kept which are required to be provided to, and considered by, the full Board at the earliest opportunity.

The Review was provided with access to the IWC Agenda papers and minutes since its inception. The IWC's inaugural meeting was on 5 November 2018, and it met five times in 2019, three times in 2020, four times in 2021, four times in 2022, and twice in 2023. Comprehensive papers from senior GRSA staff have been presented at meetings on topics such as:

- Limiting greyhound numbers on properties
- Recurring non-compliance – standard of kennels
- Intensive Learning Program Pilot
- Track Injury Rebate Scheme
- Local Rules and policy amendments
- GRSA Risk Matrix Framework.

A summary of pending investigations and inquiries is also tabled as a standing item on the agenda.

The Review identified some issues with the current model. First, the two independent members who sit on the IWC also sit on the IHP. This is problematic in that the IWC should be an avenue for robust discussion on all welfare and integrity related matters, which may include whether particular matters should be referred to the IHP and discussion of IHP outcomes and penalties. The IHP cannot be considered fully independent if its members are also privy to those discussions. The Review is not suggesting the IHP or IWC have been compromised in the performance of their functions, but rather a potential conflict exists which should be addressed.

Second, the Review understands that the regularity of IWC meetings is currently contingent on the Chair's availability, who is external to GRSA. IWC quarterly meetings should be regularised by GRSA, and if a meeting cannot proceed for any reason, it should be rescheduled within a fortnight, not cancelled.

Third, whilst the Terms of Reference for the IWC require detailed Minutes to be provided to the Board and considered, the Review's inspection of the Board Minutes indicate that the focus of the Board's meetings and discussions revolve around commercial issues, with lesser focus on welfare and integrity related matters. Whilst a director of the Board sits on the IWC, a perhaps unintended outcome of the establishment of the IWC is that the Board has lessened its responsibilities with respect to welfare and integrity issues.

Ideally the IWC Agenda Minutes should be tabled for discussion as a standing item on the Board's Agenda and the Board's discussion or approval of matters arising is reflected in detailed minutes rather than just recorded as "update noted." There is a need to formalise the Board's duties and responsibilities in this regard.

### Recommendation

The Terms of Reference for the Integrity Welfare Committee be amended such that members of the Integrity Hearings Panel cannot also sit on the Integrity Welfare Committee, to ensure the functions of the IWC and IHP are free from any potential conflicts.

### Recommendation

The duties and responsibilities of the Board in relation to integrity and welfare be included within "Accountability" at point 4 of the Board Charter to bolster the importance of the IWC's reporting function to the Board and the IWC Minutes be added as a standing item on the Board's Agenda.

## Integrity Hearings Panel

The Integrity Hearings Panel (IHP) was established by GRSA in 2018 and implemented through Division 2 of the Local Rules. The function of the IHP is to hear and determine:

- Serious Offences as defined by LR 134(3) laid by the Stewards and other charges if determined to be Serious Offences;
- other matters for which a charge has been laid by the Stewards and is deemed by the Chair or Deputy Chair of the IHP to be sufficiently serious, by their nature or impact, as to require the charge to be heard by the IHP; and
- any matter referred to it by the Chair of the Board or upon a recommendation of the Stewards.

Local Rule 134 sets out what charges are to be heard by the IHP and what the Stewards can hear and determine. The Stewards must not hear or determine any matter, or penalise any person relating to a Serious Offence, unless allowed under the Local Rules or the IHP Chair or Deputy Chair has delegated that responsibility. The Stewards or the Board may charge a person or Club with a Serious Offence. A right of appeal against a decision of the IHP lies to the Racing Appeals Tribunal (RAT).



## Greyhounds Australasia

Greyhounds Australasia Ltd (GA) is the greyhound racing industry peak body comprising representatives from jurisdictional controlling bodies in Australia and New Zealand. Originally established as the Australian and New Zealand Greyhound Association (ANZGA) in 1937, it brought together the various controlling bodies in Australia and New Zealand to establish an Australian Register of Greyhound names, produce an annual studbook, develop national racing rules, and consider national issues. The ANZGA was reconstituted in 2003 by the establishment of GA as a public company.

Membership of GA is limited to bodies that are authorised by statute to control or regulate greyhound racing in the states and territories of Australia and New Zealand. Each of GA's member bodies administers greyhound racing within their own jurisdiction. In its submission to the Review, GA describes itself as the "support arm" which creates "consistency and uniformity where that outcome is in the best interests of its members." The charter of GA is to "support these jurisdictions via encouragement of a national approach to the Australasian greyhound racing industry, promote the integrity of the industry and, where possible, coordinate a national approach to animal welfare, industry management, policies and practices."

GA's membership base is representative of the eight independent jurisdictional industry control authorities across Australia and New Zealand, including:

- Racing Queensland Limited
- Greyhound Racing Victoria
- Northern Territory Racing Commission
- Racing and Wagering Western Australia
- Greyhound Racing New South Wales
- TasRacing
- Greyhound Racing South Australia
- Greyhound Racing New Zealand.

GA provides core participant services, including keeping the greyhound stud book, the greyhound breeding database including the frozen semen registry, greyhound naming, greyhound passport for export and DNA assurance services.

## Rules of Greyhound Racing

The Greyhounds Australasia Rules (GAR) are a set of "national" rules which are adopted through the Local Rules of the respective jurisdictions. In South Australia, the Local Rules of Greyhound Racing SA Limited 2022 (Local Rules) apply to any person who takes part in any activity in connection with greyhound racing in South Australia. Through Local Rule 1(2), the GAR apply to any person who takes part in any activity in connection with greyhound racing in South Australia. To the extent of any inconsistency between the Local Rules and the GAR, the Local Rules prevail.

Since the racing industry in SA was corporatised, the rules of greyhound racing have no legislative force. As the Controlling Authority, GRSA's authority to administer and enforce the Local Rules and the GAR is presumably derived from a registered person's consent to be bound by the GRSA Rules of Racing when they become licensed as cited below from the licence application:

*I agree to be bound and comply with the Greyhound Rules of Racing of Greyhound Racing SA Limited as amended (hereinafter "the Rules") in force at the time of acceptance of this application and as amended from time to time...*

## Regulation of greyhound racing in other jurisdictions

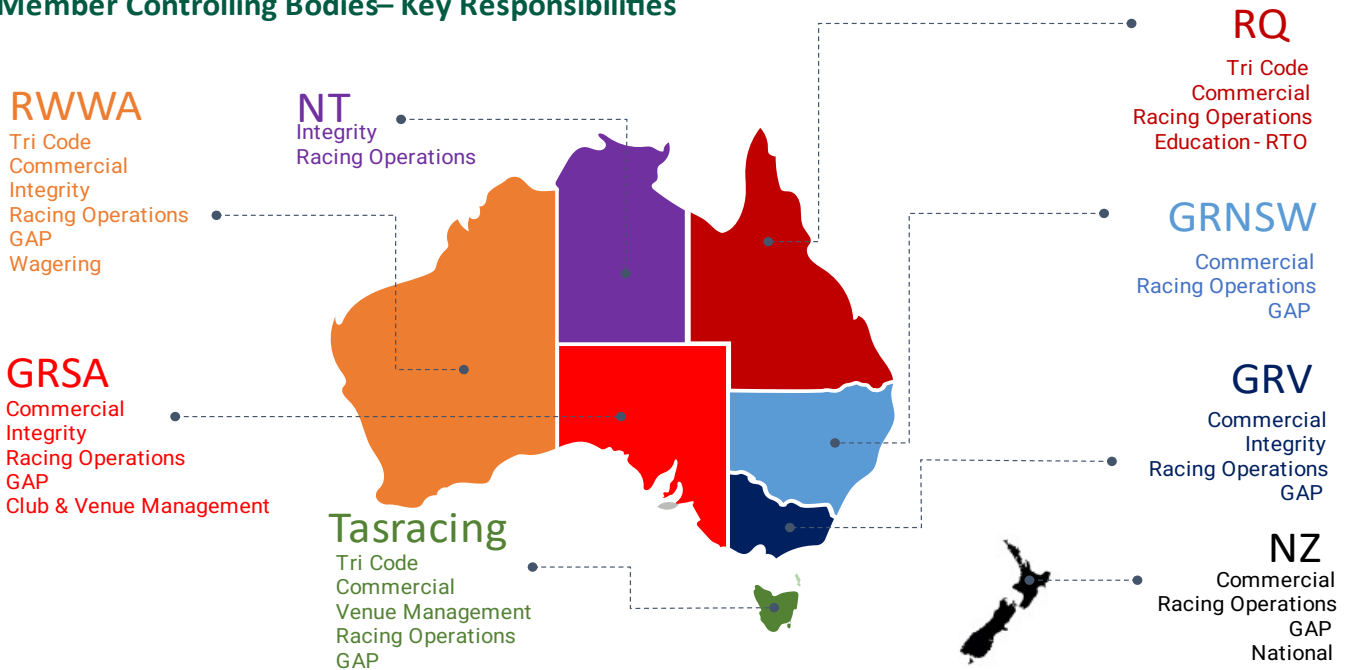
In Australia and New Zealand, the greyhound industry is regulated on a state basis with the respective statutory authority commonly referred to as the controlling authority or control body. In several jurisdictions, a delineated model applies whereby commercial and integrity operations are divided into two bodies, as outlined below:

<b>SA</b>	Greyhound Racing SA
<b>WA</b>	RacingWA
<b>NT</b>	Northern Territory Racing Commission
<b>QLD</b>	Racing Queensland and the Queensland Racing Integrity Commission (QRIC)
<b>NSW</b>	Greyhound Racing NSW and Greyhound Welfare and Integrity Commission (GWIC)
<b>VIC</b>	Greyhound Racing Victoria and the Office of the Racing Integrity Commissioner
<b>TAS</b>	TasRacing and the Office of Racing Integrity
<b>NZ</b>	Greyhound Racing New Zealand

All control body licensed participants and registered greyhounds are subject to the regulation prescribed by their respective state control body authorities, inclusive of the Greyhounds Australasia Rules.

As Greyhounds Australasia pointed out in their submission by the following diagram, when looking at the key responsibilities and strategic operations of the member controlling authorities, no two jurisdictions are the same (as shown in the diagram below).

### Member Controlling Bodies– Key Responsibilities



# 2017 Integrity Systems Review

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In 2017, McGrathNicol Advisory (McGrathNicol) were engaged by GRSA to conduct a Review of GRSA’s integrity systems and provided their report to the CEO at the time on 24 May 2017. McGrathNicol undertook a gap assessment between GRSA and the Better Practice Model (BPM) they had developed for the purposes of their review of Greyhound Racing Victoria on behalf of the Victorian Racing Integrity Commissioner. They then further developed the model to reflect recommendations by various inquiries conducted in Victoria, New South Wales and Queensland in the wake of the live baiting incidents.

The BPM outlined 11 principles (with multiple elements under each) against which GRSA’s practices and processes were assessed:

1. Governance
2. Stewardship
3. Staff conduct, private interests and conflicts of interest
4. Investigations
5. Appeals
6. Racing Operations
7. Betting compliance and regulation
8. Animal Welfare
9. Prohibited Substances
10. Licensing and Regulation
11. Complaint Handling

“Integrity” for the purposes of their report was taken to include the concepts of:

- Processes to ensure fairness in race meetings so that all greyhounds compete on the basis of their natural ability
- Processes to ensure that all races are free from manipulation of outcomes
- Processes to ensure that betting on greyhound racing is conducted fairly
- Processes to ensure that greyhounds are treated humanely
- Processes to ensure industry participants and the public have confidence in the independence of GRSA Board and the GRSA Integrity Department.

In their Executive Summary, McGrathNicol concluded:

***Our key finding is that there are a number of integrity processes that are not yet adequately documented within GRSA and many of those that are currently documented do not sit within an overarching integrity framework. There are opportunities for GRSA to significantly enhance current integrity performance by pursuing a framework approach in the further development and implementation of integrity policy and procedures.***

McGrathNicol made detailed recommendations in relation to gaps identified in their assessment. Given the relevance of the 2017 Integrity Systems Review to the Terms of Reference for this Review, the Review conducted a reconciliation of GRSA’s current policies and processes to identify whether McGrath’s Nicol’s recommendations had been substantially implemented, or whether crucial gaps still exist.

In summary, this Review found that while a number of recommendations have been adopted and implemented, some of the key recommendations have not been implemented or, the measures taken to address the recommendation, fall short of addressing the integrity risk identified. These are discussed in further detail below under the relevant headings of the BPM principles adopted by McGrathNicol.



# Governance

## Board Charter

Under the BPM principle of governance, McGrathNicol observed that GRSA's board charter clearly sets out the roles, responsibilities and composition of the Board and is consistent with the GRSA company constitution, however the only mention of "integrity" in the board charter was in relation to the integrity of "internal controls and compliance" within the "Risk Management and Financial Management" responsibility. In the opinion of McGrathNicol, the Board's role in driving integrity within the sport of greyhound racing in SA should be given more prominence in the board charter.

McGrathNicol recommended that by November 2017, the board charter be amended so that it includes a clear statement of the board's role in driving integrity within GRSA, including a statement as to the specific objectives of the board's integrity functions, as well as the formation of an Integrity Sub-committee of the board.

In response to these recommendations, the board charter was amended to include the formation of the Integrity and Welfare Committee, which was formed in 2018, however the recommendation to amend the board charter to include a clear statement as to the board's role in driving integrity, has not been adopted to date. The Chairman of the board acknowledged that on reflection, it could be included but noted it is a key value in GRSA's Strategic Plan and widely relied upon across the pillars in the Strategic Plan that the board follows.

The GRSA constitution, board charter, and 2022 Strategic Plan appear to merge the concepts of governance and integrity. For example, GRSA's 2022 Strategic Plan includes "Governance" as one of the four pillars, described as "enforce compliance and maintain high standards with industry rules and governance" (p. 6). Integrity is listed as one of four Values ("Adherence to the highest standards of integrity"), however there is no further detail as to how GRSA would seek to achieve this. There is no reference to "integrity" in the objects of the GRSA constitution; the closest reference is clause 2.6 "to provide industry control and direction for the greyhound industry."

Furthermore, the purpose of GRSA as outlined in the Strategic Plan suggests it exists primarily to encourage, promote and market the greyhound industry rather than enforce and uphold integrity standards. The reference to "provide governance and direction" for the greyhound industry falls short of what is required and lacks force. It also reflects that it has drifted from its legislative descriptor as the "Controlling Authority" to become essentially the commercial authority with its primary focus on revenue, having subsumed the roles and responsibilities of the Clubs it was intended to control in a regulatory sense.

As the Controlling Authority for the greyhound racing industry, which exists within a framework of national and local rules, policies, and is funded by gambling revenue, the constitution and board charter should clearly outline the role of the Controlling Authority and the board, and how they will drive and manage integrity within greyhound racing. It is also timely to reconsider the primary object for which Greyhound Racing SA Limited is established, which is currently stated in clause 2 of the Constitution as: "for the encouragement of animal racing". This seems at odds with its legislative mandate to be the Controlling Authority for greyhound racing.

### Recommendation

GRSA to amend its Constitution and Board Charter to:

- clearly outline the Board's role in driving and upholding integrity within the greyhound racing industry in South Australia, and
- redefine the objects of the company to better reflect the functions of GRSA as the controlling authority for greyhound racing.

## Board skill-requirements

McGrathNicol looked at the skill requirements for each of the directors for the GRSA board under the board charter and observed that the requirement to have a board member with experience in ‘carrying on a business’ was vague and, in any event, similar to the other three skill bases, all of which relate to some degree to business operation and suggested it be removed.

McGrathNicol encouraged GRSA to consider whether the skill requirements limited the opportunity for diversity at board level and whether these skills represent the needs of GRSA in the current environment in relation to integrity, animal welfare and diversity.

It was recommended GRSA amend the board-skill requirements of the Board Charter and the GRSA constitution to include a requirement to have a board member with a background in animal welfare and a board member with a background in integrity (noting one director could hold both skills). This recommendation was not supported by GRSA.

Currently, in accordance with the GRSA Constitution and Board Charter, the Board is to comprise a total of six directors, nominated by the Directors’ Selection Panel. Of these directors, there must be:

- One Director with qualifications and experience in financial management;
- One Director with qualifications and/or experience in marketing;
- One Director with qualifications and experience in carrying on a business;
- One Director with experience as a legal practitioner; and
- One Director with qualifications and/or experience determined by the Directors’ selection panel to be necessary to address existing and/or emerging business and governance issues.

All five of these directors must be independent of the greyhound racing industry, and one director must have experience in the greyhound racing industry, and may be a licensed person. In addition, at least one third of the directors must be female and at least one third male. Clause 2.9 of the GRSA Constitution includes as one of the ten secondary objects of the Company “to encourage and enhance the welfare of greyhounds”. Animal Care is expounded as one of the four pillars of GRSA’s 2022 Strategic Plan, “to maintain a position of national leadership in animal care and wellbeing” (p. 4).

Given the importance of setting, upholding and enforcing animal welfare standards which align to community expectations to ensure greyhound racing retains its social licence, it is recommended that the constitution and board charter be amended to ensure that animal welfare is reflected in the skillset of directors at the table. The Review notes this could be any suitable person with a veterinary background independent to the greyhound industry or animal welfare experience. In addition, having a director with a background in integrity is critical to give effect to the prominence that integrity should hold in the Board discharging its role and responsibilities.

### Recommendation

That the GRSA Constitution and Board Charter be amended to require at least one director to have a background in animal welfare and at least one director to have a background in integrity (noting the same person could hold both).

## Periodic Declaration of Private Interests and Probity Statements by the Board

In assessing the GRSA Board against the BPM principle of maintaining the highest level of board integrity, a gap was identified by McGrathNicol in relation to periodic declaration of private interests. The Board's conflict of interest policy requires an affirmation statement to be signed annually by each director together with a Conflict of Interest Standing Notice in respect of declared interests, however there is no requirement for periodic declarations of private interest to be made by members of the board.

McGrathNicol recommended that by November 2017, GRSA implement a policy and process for annual declaration of private interests by members of the board. The declaration of private interests should be tailored to GRSA's requirements and require declaration of private interests of the board members that may be of interest to GRSA and immediate family members that may present a risk.

McGrathNicol also found there was no requirement for periodic probity declarations to be made by the Board confirming the financial and personal integrity of board members. It was recommended this be implemented by November 2017. To date, these recommendations have not been implemented.

### Recommendation

GRSA adopt and implement McGrathNicol's recommendation with respect to periodic declaration of private interests and periodic probity statements by the Board.

# Stewardship

## Steward's Manual

The 2017 Review noted that there were a number of processes practised by GRSA which needed to be documented, and most importantly the Steward's Manual which includes the roles, responsibilities and powers of stewards (race day and non-race day). It was noted:

*GRSA has a number of documents that cover some of the procedures required in relation to race day operations including starting, swabbing and kennelling but these are not presented in a single user-friendly manual. Many of the procedures, although currently being practised, that we would expect to find in a Race Day Manual have not yet been documented or where they have been documented, are documented poorly.*

McGrathNicol was of the view that a Steward's Manual would include all elements concerning the operation of a race meeting by stewards in control of a greyhound race meeting, including:

- Role of the Senior Steward in attendance on race day
- Other steward responsibilities on race day
- Roles of other GRSA personnel in attendance at the meeting
- Safety procedures
- Handler identification on arrival
- Greyhound identification
- Weighing
- Veterinarian inspection at reception and oversight throughout the meeting
- Kennel house procedures (McGrathNicol noted GRSA has a documented procedure for kennelling of greyhounds, but it is poorly structured and does not include the identification of handlers, greyhounds, weighing, vet checking)
- Race preparation
- Parading and starting (McGrathNicol noted GRSA had a Starting Procedures procedure which covers parading and starting but found it was poorly structured, lacking in detail, not well presented and undated)
- Lure operation
- Race completion and catching (McGrathNicol noted GRSA had limited guidance in relation to catching pen operation)
- Photo finishing and judging
- Swabbing procedures
- Steward inquiries
- Greyhound welfare.

In our discussions with GRSA's [redacted], a Race Day Manual continues to be a goal that has not yet been realised, as operational tasks and workload have taken priority and a lot of decisions "are made on the fly."

Given the number of rules, procedures and processes which Stewards must adhere to, monitor, and enforce across various aspects of race day operations in four different tracks across the State, it is the opinion of the Reviewer that a Race Day Manual would be of enormous benefit to Steward staff. This view is reinforced by the absence of an accreditation program to become a Steward, which the Review understands has been explored unsuccessfully. As the role relies solely upon on-the-job training, it is therefore critical that a Race Day Manual be developed and implemented, with version control and necessary training opportunities to ensure consistency of application across the four tracks.

This Review also notes that in the absence of such a formal document existing, it poses a number of risks, including:

- Inconsistent application of rules, policies, processes and procedures in relation to race day procedures by stewards, which can in turn lead to confusion by participants as to what rules apply and unnecessary perception of unfairness.
- Difficulty in holding stewards accountable in their adherence to approved race day procedures and conduct of inquiries.
- Difficulty training and on-boarding stewards as there is no "source of truth" to refer to for those learning the job.

## Recommendation

GRSA develop and implement a Steward's Manual addressing the elements listed above identified by McGrathNicol with version control.



## Betting by Stewards

Pursuant to the Integrity (Betting & Ownership) Policy which was last Reviewed in 2021 and due for Review in June 2023, all Category A staff (which includes all GRSA Stewarding Staff) must not, at any time, directly or indirectly, participate in:

- Wagering during any hours of their employment with GRSA, including breaks
- Inducing any other party to wager or gamble on their behalf on any SA Greyhound Event
- Inducing any other person to bet, gamble or wager on their behalf, on any SA Greyhound event
- Contriving, or attempting to contrive the result or any other aspect of any Greyhound Event, for the purpose of financial reward (direct or indirect), personal benefit or on any basis of general misconduct
- Disclosing or providing any information about greyhounds nominated or drawn into a Greyhound Event unless such information could reasonably be deemed to be suitable for the public domain or reasonable to disclose in the context of performance of duties (e.g. media interview)
- Wagering at a venue wherein a GRSA race meeting is in progress unless an exemption has been received in writing from the Chief Executive
- Wagering on any SA Greyhound event at any time.

McGrathNicol recommended that the policy extend to prohibiting stewards from wagering, either directly or indirectly, on greyhound racing events anywhere in Australia, not just South Australia. It was also recommended that stewards only be permitted to wager on non-greyhound race events using nominated betting accounts.

In addition, it was identified that GRSA does not currently require stewards to submit a betting declaration that they have complied with the relevant betting policy and providing details of all betting accounts in the steward's name and those used for indirect wagering. As there is no such requirement, it was identified there is also no audit of same. These recommendations have not been implemented.

### Recommendation

GRSA amend the Integrity (Betting & Ownership) Policy to implement the McGrathNicol recommendations with respect to:

- Prohibiting stewards from wagering, either directly or indirectly, on greyhound racing events anywhere in Australia, not just South Australia.
- Requiring all stewarding staff to submit an annual betting declaration identifying:
- Compliance with the Integrity (Wagering, Ownership and Gaming) Policy or any exception to compliance
- Details of all wagering accounts held in the steward's name
- Details of any wagering accounts in someone else's name but via which the Steward has placed a bet during the year.

### Recommendation

In addition, that GRSA undertake a Review/ audit of betting declarations by requesting the wagering providers details of any betting accounts in the name of the stewards and requesting details of any other account identified in the declarations.

# Staff conduct, private interests and managing conflicts of interest

## Code of Conduct for GRSA Staff

The Better Practice Integrity Model which GRSA was assessed against, suggests a Statement of Ethics and Integrity (in a Code of Conduct or similar document) is present, and is effectively communicated to all staff. McGrathNicol found that, in effect, there was no Code of Conduct for all GRSA staff and recommended a Code of Conduct applicable to all GRSA staff and stakeholders be developed with a target date of November 2017.

The Review team requested to view the current GRSA staff Code of Conduct and were provided with the GRSA Employee Handbook which introduces the Board, Senior Management Team, history, vision and values, and outlines various HR processes such as performance Review, dress code, leave and dispute resolution procedures. It also includes a page stating that bullying and harassment are not tolerated and gives examples of bullying and how employees can raise concerns.

The employee is required to sign that they have read the handbook and agree to abide by the following policies:

- Cameras in the Workplace
- Confidentiality
- Conflict of Interest
- Discipline
- Discrimination
- Drugs and Alcohol in the Workplace
- Fraud, Bribery and Anti-Corruption
- Grievance and Complaint Handling
- Information & Communication Technology
- Integrity (Wagering, Ownership and Gaming)
- Sexual Harassment
- Social Media
- Whistleblower
- Work Health & Safety
- Workplace Bullying and Harassment
- Workplace Flexibility Policy

There is a document titled “GRSA Code of Conduct (ratified GRSA Board Meeting 8/12/2018) which appears on the GRSA website, which may have been developed in response to the McGrathNicol recommendation, however this document was not referenced in response to the Review’s request for the current Code of Conduct so it is not clear whether this document is contemporary. In addition, the staff policies reference in the GRSA Employee handbook are written in such a way that the positive obligations and prohibited conduct do not appear in a clear, concise and specific manner.

## Recommendation

GRSA to develop and implement a staff code of conduct to provide its employees with clear instructions about what they can and can’t do in the workplace, including ethical obligations, values, accountability, standard of conduct, standard of practice, and disciplinary procedures.

## Managing declared conflicts of interest

McGrathNicol observed that while GRSA had a staff Conflicts of Interest policy, there were no processes for managing conflicts. The report also states:

*We were advised of people who hold incompatible roles, and which may represent a conflict of interest including:*

- *A starter who is a greyhound trainer*
- *Lure drivers who are greyhound trainers*
- *A steward whose father is a greyhound trainer.*

This Review found this remains a potential issue, as we were advised by senior staff that a [redacted] trainer had [redacted] been in discussions with GRSA about becoming a casual lure driver, however this did not eventuate. The fact that it was even contemplated that a licensed trainer might be employed as a casual lure driver highlights the need to implement a policy as to what roles (whether casual or permanent) cannot be held by persons of a prescribed class/position.

This Review also found with respect to the current Conflict of Interest policy, there is no discussion in the policy as to how the conflict is to be managed by GRSA and no documentation for declaring such a conflict, or reference to a register of declared conflicts being kept and maintained by GRSA.

The current conflict of interest form which a staff member is required to complete in the event of an actual or potential conflict arising states:

### **Conflict of Interest Declaration**

*Please declare any interests in greyhounds as per the Integrity (Wagering, Ownership and Gaming) Policy. This will then be Reviewed by the CEO for consideration.*

*I declare that I have the following interest/s in greyhounds: ....*

This form is inadequate for the declaration of any actual or potential conflicts as it only applies to interests in greyhounds which are required to be declared pursuant to the Integrity (Wagering, Ownership and Gaming) Policy which is discussed further below.

### **Recommendation**

That the GRSA Staff Conflict of Interest Policy be expanded to require all actual, perceived or potential conflicts of interest to be declared by staff with associated documentation developed and implemented for declaration and management of conflicts, as well as a conflict of interest register created and maintained by GRSA.

## **Declaration of Private Interests**

McGrathNicol observed that GRSA does not have in place a requirement for declaration of private interests and recommended that GRSA develop and implement a policy requiring all integrity related personnel (as a minimum) to make a declaration of private interests. Such a declaration may include specific questions as to direct and indirect interests in:

- Racing greyhounds
- Other racing animals
- Ownership or leasing of properties
- Financial interest in any properties
- Declaration as to any racing related entity in which the declarant holds office
- Declaration as to any racing related entity in which the declarant is a shareholder or has another business interest
- Declaration as to any racing related Trust in which the declarant has an interest
- Declaration as to any racing related real estate in which the declarant has an interest
- Declaration as to any racing related contract or agreement in which the declarant has an interest
- Declaration as to any financial or other racing related interest in which the declarant has an interest.

This recommendation has not been implemented. Staff are required to declare any interests in greyhounds as per the Integrity (Wagering, Ownership and Gaming) Policy but no other private interests.

### **Recommendation**

GRSA adopt and implement McGrathNicol's recommendation in relation to declaration of private interests for all senior management and integrity related personnel.

## Gifts and Benefits Policy

McGrathNicol found that GRSA did not have a gifts and benefits policy in place and recommended that such a policy be developed and implemented. It appears that this recommendation was implemented as the GRSA Fraud, Bribery and Anti-Corruption Policy (last Reviewed June 2021 and due for review in June 2022) contains a section on “Gifts, Hospitality and Other Benefits”.

The policy requires employees to notify the CEO prior to accepting or giving any gift, hospitality or other benefit valued at \$500 or more and “the CEO will assess if it is appropriate to give, accept or decline an offer of a gift, hospitality or other benefit.” The policy also requires gifts, hospitality or other benefits (including entertainment) valued at \$500 or more to be recorded annually in the Gifts Register Annual Declaration form.

It is not clear why a minimum threshold of \$500 was applied to the declaration requirement, as any gift or benefit received by an employee could reasonable be perceived as influencing them in the performance of their duties and functions as a GRSA employee and should be declared.

### Recommendation

Implement a gifts and benefits policy which expressly states that GRSA employees:

- must not seek or accept gifts or benefits for themselves or others that could reasonably be perceived as having the potential to influence them in the performance of their duties and functions as a GRSA employee; and
- requires any non-pecuniary gifts or benefits offered to employees by persons external to GRSA to be declared in a register that is maintained by Human Resources.

## Betting Compliance and Regulation

McGrathNicol found that GRSA did not have documented policies or processes in connection with the effective supervision of on-course or corporate wagering. It was recommended GRSA:

- Develop and implement policies and procedures for the effective supervision of on-course and corporate wagering, and
- Develop and implement a steward training program in relation to identifying and investigating unusual betting activity on-course and within corporate betting agencies.

Concerningly, these recommendations have not been implemented or addressed. The recommendations to discuss these shortcomings are discussed elsewhere in the report.

## Animal Welfare

Under the BPM principle of Animal Welfare, McGrathNicol made recommendations in relation to on-track veterinarians which do not appear to have been implemented, including:

- Develop a process to document the role of the veterinarian at race meetings.
- Develop a declaration of private interest/ conflict of interest for completion by on-course vets, identifying any racing animal in which they have an interest or any trainer/owner with whom they have a financial association or personal/professional relationship.

The Review team observed one of the on-track vets who also performs on-track vet services for Greyhound Racing Victoria had reference to a comprehensive vet manual titled “2019 On-track Veterinarian Education Folder” which included the following useful and important information:



- FAQs for new on-track vets
- the Kennelling and pre-race veterinary examination guide
- Post race exam FAQs
- Racing Injury analysis
- Pain Management Guidelines
- Greyhound Drug Chart (Quick dosage reference chart)
- Common emergency procedures guide
- How to fill in a Veterinary Certificate FAQ
- Copy of Veterinary Certificate
- GRV Standdown time guide
- Veterinary Information Report
- Endorsements FAQ
- OTV Swabbing FAQ
- OTV Hot Weather Policy – further advice
- Essential On Track Veterinary Notes (including lameness evaluation)
- Greyhound recovering Initiative
- On Track euthanasia guidelines
- Dealing with injured greyhounds on track
- Conflict of Interest Policy
- Greyhound Ownership Policy
- Gambling Policy
- Participant Education section (out of competition testing, veterinary attention, poor body condition FAQ, wounds FAQ, Greyhound Oral Health FAQ).

Given the crucial role of on-track vets at greyhound race meetings in monitoring and attending to all aspects of greyhound welfare, an on-track veterinary manual similar to GRV's should have been implemented to ensure consistency of veterinary services and that on-track vets are aware of the policies and procedures which they must adhere to.

## Recommendation

GRSA, in consultation with an on-track vet(s), develop and document an on-track vet folder similar to Greyhound Racing Victoria.

# Prohibited Substances

Under the BPM principle of Prohibited Substances, it was identified by McGrathNicol that GRSA has a documented swabbing procedure and protocol, however there were a number of improvements needed. McGrathNicol recommended that GRSA leverage documentation prepared by controlling bodies in other jurisdictions to prepare a clear policy and process document that includes, at a minimum:

- Policy objectives
- Security measures
- Commencing the procedure
- Retrieval of the greyhound
- Collection process
- Witnessing of documentation
- Chain of custody, storage and transportation
- Out of competition testing
- Collection of other substances.

GRSA advised this Review that the swabbing procedure has been updated over time and follows similar procedures used by Racing SA but has not been finalised.

McGrathNicol observed that GRSA pre-race and post-race testing is at the discretion of any of the Stewards, and testing is also performed as instructed by the Integrity Manager (typically based on intelligence and/or suspicion of prohibited substance use). McGrathNicol recommended GRSA develop a policy and procedure document setting out GRSA's swabbing policy and process, including its approach to swabbing and timeframes for following up anomalous results. McGrathNicol also found there is no policy governing the rate of testing and recommended the policy include objectives regarding the rate of testing, and GRSA should ensure that on an annual basis, the rate of testing is best practice and meets or exceeds the rate of testing in other jurisdictions.

GRSA's [redacted] advised this Review that stewards follow a sample policy that is not publicly available and depends on a number of factors, including greyhound performance. GRSA submitted its swabbing numbers are comparable to other jurisdictions when considered in the context of resources and budget.

In relation to out of competition testing, McGrathNicol found there is no documented process for the taking of out of competition samples, or a policy governing an effective program.

GRSA's [redacted] advised in relation to the process of Out of Competition (OOC) swabbing, the procedure is the same as other swabbing, but there is no policy on the approach to OOC swabbing. At the moment, OOC swabbing may be conducted where intelligence might suggest an OOC swab is beneficial, or at the request of other Controlling Bodies. At present, due to budget constraints, there is no process for random OOC swabs; but this is constantly reviewed.

### Recommendation

GRSA finalise its documentation of all swabbing and sampling procedures.

### Recommendation

GRSA to document their internal policy outlining their approach to swabbing and sampling (acknowledging its sensitivity) for review by General Manager, Integrity and Welfare, including targeting of participants subject to suspended suspensions for prohibited substance outcomes.

## Complaint Handling

As part of their Best Practice Model, McGrathNicol noted there should be a rigorous and transparent process for receiving and handling complaints, including integrity concerns received from industry participants, as well as a process for reporting complaints through to management and the Board. McGrathNicol found:

- Complaints were communicated to GRSA by a range of means including telephone, in person, email and Facebook and typically referred to the person relevant to the nature of the matter.
- GRSA did not have a central register for complaints and resolutions.
- There were no documented procedures for receiving, recording and handling complaints.
- There was no protocol to ensure the Integrity and Welfare department had knowledge of complaints.
- Complaint statistics are not maintained or reported.

McGrathNicol made detailed recommendations in relation to these deficiencies, including that GRSA develop and implement a Complaints Handling Procedure including a complaint register with periodic reporting to the Board or the Integrity sub-committee (now the IWC).

It appears most of these recommendations have not been implemented. GRSA encourages reporting of suspicious behaviour, greyhound welfare or integrity concerns through a page on their website titled "Report Suspicious Behaviour" which states:

## **Report Suspicious Behaviour**

*To report suspicious behaviour, greyhound welfare or integrity concerns, please call or email GRSA. If you have any videos, pictures, or other recordings (in any format) you can also include them.*

*To report a crime anonymously to the police, please contact CrimeStoppers on 1800 333 000 or use the Crime Stoppers online service at [crimestoppers.com.au](http://crimestoppers.com.au). Email us at [KnowTellProtect@grsa.com.au](mailto:KnowTellProtect@grsa.com.au) (please note we will receive your email address if you send an email).*

## **What We Do With Your Report**

*We are committed to best practices in greyhound care and integrity, and your concerns are important to us. To investigate your concerns as best we can, we appreciate a way to contact you for further information. However, you can elect not to fill out your details and just submit your concern (but please note we will not be able to update you).*

*If you provide your details, we will keep them confidential (including not publishing them), unless we obtain from you your permission to refer to you in a formal Inquiry. If we obtain your details and, ultimately, publish an Inquiry determination, we will omit your details from the public record.*

*In some instances (for example, criminal offences), we may refer your report to the RSPCA or the police, depending on the type of behaviour you report.*

*Greyhound Racing SA encourages anyone with a concern about greyhound welfare to let us know.*

*For further help, contact the Risk and Compliance Manager, or the Chief Steward, on 08 8243 7100.*

The text on the webpage is somewhat confusing in that it refers to reporting a crime to Crimestoppers in the same paragraph as reporting to GRSA, however there is no further guidance provided as to what incidents/conduct/behaviour should be reported to GRSA compared to what should be reported to the police.

An email sent via the KnowTellProtect email address is forwarded to the CEO, the Chief Steward and the GM, Risk and Compliance, and then forwarded to the relevant department for further information and attention. There are, however, no documented procedures in place for the receipt, actioning, handling or resolution of a complaint, nor is there a complaints register tracking the same.

From the Review's consideration of the GRSA Board Minutes and IWC Minutes, there does not appear to be any consideration or tabling of complaints received via KnowTellProtect. At the IWC meeting in June 2021, a proposal was tabled for discussion to adopt the Crimestoppers initiative 'Safe2Say' acknowledging that GRSA does not have a dedicated reporting portal that allows anonymity. The cost however, was considered to be too high and disproportionate to the benefits it would deliver, given anonymous tip-offs are rare.

An email sent to the KnowTellProtect email address does not receive an autogenerated response communicating a timeframe for consideration of the complaint, or expectations as to whether the recipient will be contacted. The webpage also suggests there is a form to submit (i.e. the reference to "you can elect not to fill out your details and just submit your concern") however there is no form available to complete, so a member of the public or an industry participant can only email their complaint to [KnowTellProtect@grsa.com.au](mailto:KnowTellProtect@grsa.com.au). In our discussions with GRSA, it was acknowledged this did not give the option of providing an anonymous complaint, which has the potential to discourage complaints which may contain useful intelligence being submitted. The Review notes GRSA now proposes to adopt Safe2Say or a similar platform to enable anonymous reports to be received.

This Review looked at all complaints submitted through the KnowTellProtect email address since 1 January 2022 which are summarised below:

- An 18-page letter submitted 25/8/23 from a foster carer complaining about the issues with the GAP program and staff which the author had submitted through the KnowTellProtect email address as she was unsure where else to direct her concerns.
- A complaint submitted 29/9/23 that a named participant still has greyhounds on his property and is still training dogs and providing details of the address.
- A complaint submitted 23/8/23 from an animal activist group that named participants were selling off their greyhounds on Facebook marketplace following the footage released in the media with a screenshot attached and requesting a direct email address for GRSA's Chief Steward.
- A complaint submitted 26/7/23 about a named participant.
- A complaint 9/3/23 from the landlord of a registered trainer stating that she has many people contacting her about said participant and the care of his animals. The email stated the greyhounds are not in a proper facility to house greyhounds, they are never let out of the house for any exercise and are in very poor condition. The landlord provided the address of the property and explained that the named participant was never given permission to leave them locked up in a bedroom of the house; and raised concerns that the greyhounds had not had any form of vet care, and that there had been litters of puppies with no vet consultant. The landlord states "[it] would very much appreciate if they were seen by a member of your racing committee to make sure they get the appropriate care".
- A complaint submitted 23/12/22 that named trainers are violating Rules in relation to race day procedures alleging that on 22/12/22, they had 19 dogs at the track with unlicensed helpers walking and emptying their dogs.
- A media inquiry submitted 18/11/22 regarding the death of [redacted].

- A complaint submitted 17/10/22 alleging a named participant [redacted] training all the dogs that he had in his care before he was stood down.
- A complaint submitted 9/9/22 from the media manager of [redacted] informing that a named participant was present at the [redacted] and is not allowed to handle dogs at the track. The email requested confirmation of various details regarding the alleged incident.

Based on our Review of the nature of complaints received via KnowTellProtect, it is apparent that there needs to be a separate avenue to lodge a complaint or feedback regarding GRSA and its personnel rather than through KnowTellProtect, as well as a separate form for media or general inquiries.

### Recommendation

GRSA replace the KnowTellProtect webpage with a prominent "Contact GRSA" webpage with separate forms for:

- Reporting animal welfare concerns, suspicious behaviour or any other unlawful conduct relating to greyhounds and the greyhound racing industry
- Making a complaint or providing feedback about GRSA or its staff
- Submitting a media enquiry
- Submitting a general enquiry

Each avenue for contacting GRSA should auto-generate an appropriate acknowledgement from GRSA with details regarding timeframes for consideration of the same and when a response can be expected.

### Recommendation

GRSA implement a procedure for managing complaints regarding animal welfare and other unlawful conduct to ensure they are actioned in a timely manner by the appropriate branch within GRSA. All reports/complaints of that nature should be tabled at the Integrity Welfare Committee meetings to identify trends and ensure they have been actioned appropriately.



# Current Greyhound Racing Operations

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Greyhound Racing SA is the sport's governing body which manages the conduct of the industry which includes breeding, racing and re-homing retired greyhounds. The five clubs which conduct greyhound racing in South Australia are Angle Park, Gawler, Murray Bridge, Mount Gambier and the Greyhounds Owners Trainers and Breeders Association (which conducts coursing events). Each of these clubs have their own membership base and primarily seek local sponsorship and community connection opportunities. For example, the social club facilities at the Gawler Club which are of a high standard are available for use by the local football club and local community groups. The clubs however appear to have little, if any, input into day-to-day racing operations. This is conducted by GRSA.

GRSA employs staff which enables its operation. The corporate hierarchal chart is represented on page 106.

At race meetings greyhounds are expected to be presented at the kennel house on race day approximately one hour before the meeting commences. Once at the kennel house, the greyhound is checked by its microchip number and given a veterinary check which primarily looks for obvious signs of injury, examines whether female greyhounds are on heat (which would result in them not running) and examines the feet of dogs. If they pass this check, the greyhound is then weighed. The greyhound's weight must be within 1 kilogram of its previous racing weight. If the greyhound is overweight or underweight it is scratched. Once weighed the greyhound is placed in a kennel in the kennel facility which is monitored by CCTV. Kennel staff are engaged to monitor access to this temperature-controlled room where the greyhound awaits its race.

The race meeting itself is run by the stewards who have the responsibility to ensure the meeting is run on time and according to the rules of racing. Stewards observe each race and make a report of each race known as a Stewards' Report. This report details the manner in which the race was run, what if any interference occurred and whether any injury was sustained by a participating greyhound. After races occur, greyhounds are usually given water and washed down. Some may be checked by a veterinarian if the stewards believe an injury might have been sustained by any greyhound. If a greyhound is injured in a race, a steward will place a racing ban on the greyhound which prohibits it from running until its injury has healed.

The steward may also determine whether a swab is needed to be obtained from a greyhound. This is usually a urine sample, but stewards have two other options – being the taking of hair samples and in certain circumstances blood samples. For competition integrity reasons, the rationale in relation to what dogs are sampled is kept confidential, however the winner of significant races, and greyhounds that run out of character with their usual performance level will also be referred for swabbing.

Out of competition swabbing is also conducted from time to time, however there is a need for more hair testing to be done as it provides a better intelligence picture regarding the care the greyhounds are given. Some banned substances, particularly those related to muscle growth, last longer in hair than blood or urine.

A topic raising some concern from racing participants is the fact that prizemoney is lower in South Australia than other states. GRSA has stated that they return approximately 50% of revenue back to participants each year in prizemoney and associated benefits and an examination of available material appears to confirm this fact. This percentage is consistent with other states.

When examining the operations of GRSA which included interviewing key staff, observing race meetings, and attending kennel inspections, this Review determined that the organisation needs to undertake the following changes – detailed below - to its operating model to reduce greyhound injuries and improve public confidence in the sport.

## Betting analysis

There is a need to properly analyse betting patterns on greyhound racing in South Australia. Conducting a proper analysis of betting on greyhound races can provide significant intelligence regarding integrity risks to racing. Currently the practice in South Australia is for a steward to look for changes in prices on the TAB prior to races taking place. Significant price movements and an associated race result may result in a steward taking a swab from a particular greyhound. This type of analysis is very rudimentary and is not comprehensive enough to assess the risks presented to the integrity of racing through race fixing. There are national rules prohibiting lay betting by participants on their greyhounds. Lay betting involves betting on greyhounds to lose a race. This can be done on a betting exchange platform. The New South Wales greyhound racing oversight body known as Greyhound Welfare and Integrity Commission (GWIC) have recently sought this prohibition to be extended to lay betting on any greyhound by trainers or owners. This is based on the results of intelligence gleaned from betting analysis. GRSA currently have access to a lay betting platform to analyse lay bets, however, this is rarely used.

For example, in cases where a greyhound is a late scratching due to being under or overweight, an assessment should be made as to the risk to the integrity of the race that this scratching presents and whether any significant or abnormally high betting is taking place on another runner, as a result of that scratching. A late scratching in a race can present another participating dog with a vacant box next to it, or even two vacant boxes in 6 dog fields. Statistically this improves the greyhound's chances of an improved performance. Significant or abnormal betting on that particular greyhound can present information regarding potential collusion between trainers that needs to be examined by stewards. GWIC has for some time engaged a full-time analyst to assess integrity risks to greyhound racing in that state.

This analyst has to date, not found strong links between positive swabs and betting patterns but has found links between betting movements and other practices that present integrity risks. These practices include last minute scratching of greyhounds from races to provide an empty starting box next to a greyhound that has been heavily supported as described above, and betting on the running of maiden races (races for greyhounds that have yet to win a race), where greyhound form cannot be assessed due to lack of exposed racing. The stewards in New South Wales are regularly provided with intelligence from the betting analyst which is highly valued by them and is seen as important to them in effectively discharging their function. It is important to the integrity of the racing product that greyhound racing in South Australia has the benefit of integrity intelligence gleaned from betting analysis.

There have been a number of disciplinary outcomes arising from race fixing identified by betting analysts in both NSW and Victoria. There have been none identified to date in South Australia.

GRSA advised the Review it intends to acquire the application "Dynamic Odds" to assist with bet monitoring and now employs a data analyst whose role could be expanded to monitoring betting trends. GRSA also propose that the topic of Bet Monitoring could be incorporated into a standing agenda item for Board and IWC meetings.

### Recommendation

That GRSA employ a betting analyst to provide up to date intelligence to stewards on integrity risks identified through betting patterns.

### Recommendation

GRSA introduce a local rule prohibiting participants from lay betting on any greyhounds racing at South Australian tracks.



## Stewards

The role of stewards is critical to the success of greyhound racing. They must be educated in their role and supported with equipment to perform their role, which includes integrity of the racing itself, and greyhound welfare. In South Australia there is a clear requirement for more stewards to be employed by GRSA. It is regularly the case that insufficient stewards are in attendance at race meetings, placing pressure on existing staff. GRSA currently employ stewards including a full-time chief steward. These employees must cover all race meetings every fortnight covering Saturday mornings, Sundays, and Monday and Thursday evenings. It is clear that the hours and continuous days worked by stewards and duties expected of them is placing unwarranted stress on them due to their low numbers. More stewards will provide an opportunity for integrity engagement with participants both in and outside of competition days.

The role of stewards is to oversee the race meetings and they are responsible for maintaining the integrity of racing. This role extends to ensuring that the welfare of greyhounds is paramount. During a race meeting, stewards oversee the kennelling of greyhounds, supervise the conduct of a race, and declare the outcome of an event. Stewards also complete a report for each race conducted where they report any unusual or noteworthy events and record any interference a greyhound receives. They also record when swabbing decisions are made. The time a steward takes to record interference takes up a great deal of time between races. GRSA could follow the lead of some other jurisdictions of electronically lodging the report and hyperlinking the video of the race to the report and only recording significant events in the report itself. This would allow more time for the stewards to observe and speak with participants and make necessary pre- and post-race inquiries.

The role of a steward is a difficult one and the Review was impressed with their work ethic and dedication. They have the challenge of maintaining constructive relationships with participants whilst at the same time holding them accountable. The necessary familiarity can lead to difficulties when they also have a role delivering inquiry penalties. This is dealt with elsewhere in this report. The Review also found that the stewards are the key person to whom participants will raise concerns about many issues regardless of whether they fall within the remit of stewards, or not. This is because they are often the only GRSA representative at many meetings. If GRSA was to ensure that they had a management representative at meetings in the role of a race day operations manager, this burden could be removed from the stewards. It would also provide a ready point for engagement between participants and GRSA at all race meetings.

### Recommendation

It is recommended that a human resources review be conducted in consultation with staff to determine the optimum staff number of stewards engaged by GRSA. These staff should then be recruited.

### Recommendation

GRSA should ensure a person representing GRSA is available to participants at race meetings to ensure stewards can focus on their core functions.

### Recommendation

Stewards should only record significant interference on stewards' reports and append video footage of the race to the steward report.



## Drug testing

Currently GRSA apply the Greyhounds Australasia standards for identifying both banned and prohibited substances through taking drug samples from greyhounds. Banned substances are chemicals that are permanently banned from being present in greyhounds and prohibited substances are chemicals that are not permitted to be in a greyhound on race day. The swabs are usually received by urine and occasionally by blood, and samples are taken by club veterinary officers and stewards. Once taken, the samples are retained by stewards and forwarded to a private forensic laboratory for testing.

Most recent data provided by GRSA has shown there was a positive swab result of just over 1% of total swabs conducted in the year 2021/22. This was a significant increase on positive swabbing results in previous years.

This result can be interpreted in different ways. It could for example mean drug use is increasing or it could mean that testing is better targeted. Either way it is important that analysis is conducted on positive results to determine trends by drug type, race type, etc. This analysis can better inform testing decisions in the future. It is unclear to what extent this type of analysis is conducted by GRSA, or in the case of targeted testing, what informs these decisions or the setting of criteria. In any event the Stewards should be transparent with the General Manager Integrity and Welfare as to what the decision-making criteria are relating to swabbing decisions, and ensure any targeted swabbing includes those who are subject to suspended suspensions because of prohibited substance outcomes.

Out of competition testing is another area that GRSA would benefit from increasing. After a recent animal welfare case, GRSA took a decision to drug test greyhounds at a particular kennel. This should occur more regularly to provide both a deterrent effect and a source of intelligence to stewards.

A regular out of competition testing method used by stewards in some other jurisdictions is hair testing. Hair testing has been a more recent feature of drug testing by greyhound racing stewards. A recent, well publicised case of physical animal abuse resulted in hair testing of a number of greyhounds in the custody of a trainer. Hair testing can provide evidence of prohibited substances, particularly growth hormones in greyhounds over a longer time period. It has challenges under the current racing rules in proving actual drug use by trainers but is a very useful intelligence guide for stewards. Industry events over recent months have seen a general increase in drug testing by stewards and this should be encouraged. Testing decisions should also be informed by intelligence received by stewards from various sources.

### Recommendation

GRSA should incorporate hair testing as a more regular feature of their drug testing environment. Targeted out of competition testing by using hair samples should also be increased.

### Recommendation

Analysis of positive swabs should be conducted to provide trend data to stewards which can inform future targeted testing and industry education.

## Racetrack injuries

Injuries to greyhounds on racetracks are commonplace. Over the course of a greyhound's racing career, they will incur injuries of various types. These can range from minor muscle soreness, which is very common, through to catastrophic injury. Injuries to greyhounds at racetracks is one of the most vexed areas of greyhound racing and a continued source of conflict between the industry and external organisations. GRSA must be both transparent and active in this area if they are to have community trust that they are doing all things possible to reduce greyhound injuries. GRSA publish data on the number of track injuries on the GRSA website. As shown in Table A below, the figure is expressed as a percentage of total injuries per race starts and includes all reported injuries, regardless of severity or whether a stand-down period applies. This figure shows that as a percentage of all races, injuries are low.

However, this figure does not consider the percentage of injuries by the actual number of individual greyhounds racing. This data, reproduced in Table B below, is kept by the Coalition for the Protection of Greyhounds (CPG) based on the published number of dogs as per the Dog and Cat Management Board (DCMB) Annual Report. Table B shows an injury rate for greyhounds by individual greyhound covering all injury types and - allowing for any inaccuracies - essentially shows that about half of racing greyhounds incur some type of injury during their racing career. This is an important statistic for the GRSA to publish. Statistics for track injuries to greyhounds during trials are just as important as race meetings. To establish a comprehensive picture this data must also be captured and reported.

The Greyhound Welfare Integrity Commission (GWIC) has a quarterly publication detailing injury analysis for greyhounds racing in New South Wales. This is done to provide a body of evidence regarding racetrack injuries to allow the industry to make evidence-based decisions when endeavouring to reduce injuries. This data categorises injuries and in addition to trend data it includes the above data sets. GRSA do have access to these learnings from New South Wales and are trialling some injury reduction methods in South Australia. There is both a transparency need, and injury reduction need for GRSA to publish the same injury data and analysis as GWIC. GRSA also need to follow the example of GWIC in establishing an injury reduction panel to conduct the necessary review of the data and make decisions regarding safeguarding measures.

Analysis of available data in both South Australia and New South Wales reveals most injuries occur on turns in racetracks when greyhounds are placing high speed pressure on their lower legs to navigate the turn. GRSA has, since 2019, been conducting race meetings on a straight track in Murray Bridge. This has had a positive benefit in reducing greyhound injury.

Data analysis in New South Wales also shows that greyhounds returning to racing after a lengthy lay off period are at substantially higher risk of sustaining a serious injury. Accordingly, GWIC have introduced a rule requiring that greyhounds which meet this criterion, are to be the subject of a veterinary clearance.

It has also been established after analysis that certain trainers have a higher proportion of injured greyhounds, meaning that as a minimum, investigation of that trainer's training methods are required. If necessary, further education should be provided if they are to continue holding a trainer's licence.

**Table A**

GRSA Annual Report	Number of starters	Published injury rate	Number of injuries
2019-20	28,202	2.57%	725
2020-21	28,246	2.95%	833
2021-22	31,354	2.99%	937

**Table B**

DCMB Annual Report	Number of individual greyhounds	Number of injuries	Injury rate
2019-20	1,385	725	52.3%
2020-21*	NA	833	NA
2021-22	1,125	937	83.2%

\*DCMB did not publish an annual report for 2020-21

Greyhound Racing SA are currently examining, trialling, and/or implementing, a number of racetrack safety initiatives. These are:

- Preferential dox draws based on GPS data.
- Use of double arm lures.
- Increase in the number of 6 dog races.
- Continued development of a consistent measuring tool for establishing the safest surface density.
- Increase in straight track racing.
- Establishment of GWIC style quarterly racetrack injury report.
- Establishment of a race injury Review panel as per the NSW model.
- Injury analysis to include injury by greyhound trainer.
- Development of education program for trainers who have a high prevalence of injured greyhounds.
- Greyhounds returning from long layoffs to be required to be the subject of a veterinary clearance pre-nomination.

In regard to a consistent measuring tool to measure surface density, GRSA are examining a tool known as a 'going stick' to provide cumulative data on this area. The going stick also has GPS capability and can provide a detailed map of a track surface by surface density.

Another area that is worthy of analysis is the position of starting boxes relative to racetrack turns. The Review has heard anecdotally from a number of GRSA staff and participants that issues can exist when starting boxes are either too far, or too close, to turns. It would be worth conducting analysis as to any injury prevalence related to starting box position.

It is possible through adopting all of the measures above that there would likely be a very significant reduction in racetrack injuries to greyhounds. Of course, with any animal travelling at speed, whether on the racetrack, in an off-leash park or any external setting, some injuries are inevitable. It is important though that greyhounds racing for gambling revenue are doing so in an environment that places their safety as the paramount priority.

In 2018 GRSA introduced a Track Injury Recovery Scheme (TIRS) with the provision of up to \$1,500 towards treating greyhounds injured during events at racetracks in South Australia. Currently the GRSA provide up to \$3,800 in such circumstances. This amount compares well with what is provided under interstate schemes.

## Recommendation

GRSA publish a quarterly analysis of greyhound injury data in the same manner as GWIC. This analysis must be published to the community.

## Recommendation

GRSA implement the following track safety initiatives:

- Preferential dox draws based on GPS data.
- Use of double arm lures.
- Increase in the number of 6 dog races.
- Continued development of or acquire an off the shelf consistent measuring tool for establishing the safest surface density.
- Increase in straight track racing.
- Establishment of GWIC style quarterly racetrack injury report.
- Establishment of a race injury Review panel as per the NSW model.
- Injury analysis to include injury by greyhound trainer.
- Development of an education program for trainers who have a high prevalence of injured greyhounds.
- Greyhounds returning from long layoffs to be required to be the subject of a veterinary clearance pre-nomination.

## Recommendation

GRSA conduct a Review to determine any links between racetrack injuries and locations of starting boxes on the tracks in South Australia.

## Recommendation

Injuries to greyhounds during trials should be properly recorded and published by the industry.

## GRSA heat policy

There have been numerous studies conducted on the effect of heat on racing greyhounds. A significant review was conducted in 2016 by Dr J.E. McNicholl from the University of Adelaide titled 'Heat Stress in Greyhounds' (unpublished). This was an extensive examination of the issue which concluded that the risk of heat illness in greyhounds greatly increased when the ambient temperature reached greater than, or equal to, 38 degrees Celsius. GRSA conforms with other Australian greyhound racing bodies by ensuring greyhounds do not race when the temperature is above 38 degrees. Between 35 and 38 degrees, stewards have a discretion to prevent racing if they believe it is not safe to do so.

Greyhounds experiencing heat when being transported by trainers is also a risk as several trainers do not have air-conditioned transport trailers. GRSA have stated as policy that all trainers must have air-conditioned transport facilities by 1 December 2025. Many trainers have been observed to use air-conditioned transport vehicles/vans rather than the traditional trailer to overcome this requirement.





# Greyhound Welfare

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One of the most significant areas covered by this Review relates to greyhound welfare. The issue of social licence is particularly important in this regard. If the industry cannot provide adequate welfare for greyhounds to a standard that the general community considers acceptable, its licence - in the social sense - to operate in its current form, should not exist. This Review has sought to view animal welfare through this lens and has formed its views by undertaking site visits to racetracks, race kennel facilities, breeding facilities, GAP kennel facilities and RSPCA facilities, both existing, and prospective. The Review also conducted interviews with GRSA staff, spoke with trainers and received many submissions from both inside and outside the industry as well as general members of the community.

The community expect that greyhound welfare standards should be exemplary, and any examples of neglect or mistreatment of a greyhound should be treated as a serious matter. The GRSA have the marketing phrase 'We Love Our Dogs' and include 'animal care' as one of the 'five pillars' of their Strategic Plan. Expectations are understandably high in terms of animal welfare and the stated intention of GRSA is to meet those expectations. This Review undertook an assessment of whether these community expectations are in fact being met.

Currently GRSA has a capacity of three (3) staff performing welfare inspections, not including the Welfare and Rehoming Manager. This Review believes that the number of staff is insufficient for the task. Currently, the stated objective of the welfare team is to visit each training facility each year. There is little capability in the team to be truly proactive when planning inspections. They do not have the services of analytical staff that could assist them in better inspection targeting, although the team do have regular contact with stewards and receive information from them to assist in this regard.

Recent changes to welfare capability have included the appointment of a General Manager, Integrity and Welfare. The Review was impressed with this person's recent efforts and position on welfare matters. This person needs to be properly resourced to ensure the necessary improvement can be achieved.

Currently, welfare visits are usually done by appointment with trainers. More recently however, some visits have been unannounced. This has led to dissatisfaction expressed by some trainers who have been unhappy with welfare inspectors entering their property in their absence. Of course, it is preferred if inspections are conducted in a collaborative manner, however for effective inspections to occur, inspections need to continue to be unannounced when considered necessary.

In order to ensure full transparency, the General Manager, Integrity and Welfare should have a dual reporting line to both the GRSA Executive/Board, and the independent inspector recommended in this Review to oversee industry reforms.

### Recommendation

GRSA review the staffing levels in the welfare team to ensure it is properly resourced to achieve a proactive function.

### Recommendation

GRSA engage the services of an analyst to assist the proactive targeting capability of the welfare team.

### Recommendation

The welfare function of GRSA should have a dual reporting line to both the GRSA Executive/Board and the independent inspector recommended in this Review to oversee industry reforms.

## Animal Welfare: The Statutory Scheme

In South Australia, the statutory scheme for the protection of animals is contained in the *Animal Welfare Act 1985* (AWA) and the *Animal Welfare Regulations 2012*. The offences contained within the AWA relevant to the greyhound racing industry include ill-treatment of an animal and the prohibition on live baiting and related activities.

Under section 13(1) of the AWA, if a person ill-treats an animal and the ill treatment causes the death of, or serious harm to the animal, in circumstances where the person intended to cause the harm or was reckless, the person is guilty of an offence. A maximum penalty of \$50,000 or imprisonment for four years applies.

Under section 13(2) of the AWA, a person who ill-treats an animal is guilty of an offence. A maximum penalty of \$20,000 or imprisonment for two years applies.

For the purposes of those offences, “ill treatment” of an animal includes:

- (a) *intentionally, unreasonably or recklessly causes the animal unnecessary harm; or*
- (b) *being the owner of the animal—*
  - (i) *fails to provide it with appropriate, and adequate, food, water, living conditions (whether temporary or permanent) or exercise; or*
  - (ii) *fails to take reasonable steps to mitigate harm suffered by the animal; or*
  - (iii) *abandons the animal; or*
  - (iv) *neglects the animal so as to cause it harm; or*
- (c) *having caused the animal harm (not being an animal of which that person is the owner), fails to take reasonable steps to mitigate the harm; or*
- (d) *causes the animal to be killed or injured by another animal;*
- (e) *kills the animal in a manner that causes the animal unnecessary pain; or*
- (f) *unless the animal is unconscious, kills the animal by a method that does not cause death to occur as rapidly as possible; or*
  - (i) *carries out a medical or surgical procedure on the animal in contravention of the regulations; or*
  - (ii) *ill treats the animal in any other manner prescribed by the regulations for the purposes of this section.*

The AWA also makes provision for codes of practice and section 43 states that “nothing in this Act renders unlawful anything done in accordance with a prescribed code of practice relating to animals.”

This Review received a number of submissions from the public complaining that greyhounds were exempt from the provisions of the *Animal Welfare Act 1985*, suggesting that racing animals are exempt from animal cruelty offences under a Code of Practice. However, no such Code of Practice exists for the greyhound racing industry and racing of greyhounds does not fall into any of the prescribed Codes of Practice listed in Schedule 2 of the *Animal Welfare Regulations 2012*.

A Code of Practice exists for a person who breeds or trades companion animals (see *South Australian Standards and Guidelines for Breeding and Trading Companion Animals*, Department of Environment, Water and Natural Resources (2017), as in force from 1 August 2017). These standards must be observed by the owner of any dog or cat that is bred or traded, irrespective of whether the activity is in private or in public, or whether the dog or cat is being held short term or long term.

It appears these standards would apply to the breeding of greyhounds, as “companion animals” for the purposes of the standards include dogs, however they are of limited application in the greyhound industry as they would only apply to breeding greyhounds and their pups; they would not extend to greyhounds outside of breeding, such as racing greyhounds, or greyhounds retired from racing who remain at a premises waiting to be rehomed.

The AWA is enforced by the RSPCA. The Minister responsible for the AWA appoints RSPCA inspectors who can exercise powers under the AWA for the administration and enforcement of the AWA. RSPCA Inspectors may also carry out routine inspections of premises or vehicles if the occupier is given reasonable notice of the inspection. Inspectors may issue animal welfare notices (s 31B) if the welfare of an animal is being adversely affected directing an owner to take specified action such as provide food, water, shelter, rest or treatment, or require the owner to ensure the animal is exercised.

Offences prosecuted by the RSPCA under the AWA are criminal offences and therefore the criminal standard of proof (beyond reasonable doubt) applies in any prosecution.

At this point, two observations need to be made:

- The AWA applies to all persons connected with the greyhound industry, including licensed owners, breeders and trainers of greyhounds, as well as any person who might be involved in the rehoming of a greyhound, whether raced or unraced. There is no carve out for the greyhound racing industry.
- No powers of investigation or enforcement of animal welfare offences have been delegated by the Minister responsible for the AWA to GRSA or any of its employees. As such, investigation and enforcement of animal welfare offences under the AWA within the greyhound racing industry rests solely with the RSPCA.

This highlights how critical the relationship is between GRSA and RSPCA in terms of cooperation, communication, collaboration and referral by GRSA of potential breaches of the AWA by licensed participants or persons connected to the greyhound racing industry.

The relationship between the RSPCA and GRSA at present can be described as vexed. There have been no formal meetings between the two organisations for over three years and it appears their collaboration and communication peaked around the time the live baiting Four Corners episode was aired in early 2015.

In their submission to the Review, the RSPCA stated:

*It is currently not mandatory for Greyhound Racing South Australia to report any cruelty or welfare related matters to RSPCA South Australia. The industry can pick and choose what or if they report to the RSPCA. The level of reporting varies, depending on the 'current relationship' between the two organisations. This relationship fluctuates between cooperative and adversarial, depending on a number of factors, including the media landscape, the nature of the issue being reported, and the current staff and leadership of both organisations.*

There is no MOU in place governing the sharing of information, referral of matters or joint investigations, and where their roles and responsibilities with respect to animal welfare issues have overlapped, there has been tension.

This Review notes there has never been a greyhound (racing or pet) related animal welfare prosecution in South Australia under the AWA, however several prosecutions have been taken by the RSPCA for offences against the AWA in relation to ill-treatment of other dogs.

For example, in 2023 the RSPCA prosecuted a dog breeder for offences against the AWA in relation to inadequate and inappropriate living conditions which resulted in a failure to mitigate mental harm to 10 dogs, a number of which could not be rehabilitated and had to be euthanised. The breeder was found guilty at trial, and the Magistrate imposed a suspended sentence of 3 months imprisonment.

The overlap between RSPCA's role in investigating and enforcing breaches of the AWA and GRSA welfare officers' role in investigating potential breaches of the GRSA Rules and Animal Welfare Policy has created difficulties for the RSPCA in relation to obtaining evidence.

In their submission, the RSPCA refers to the live baiting footage which GRSA received anonymously in 2022 as an example:

*An RSPCA SA inspector received a report directly from GRSA regarding a person allegedly live baiting at a South Australian property. The GRSA representatives advised that the anonymous reporter had provided a video showing the live baiting occurring. The complaint they received was also sent to Animals Australia (which is why we suspect that they advised the RSPCA promptly, upon receipt of the complaint). GRSA staff were able to identify the individuals present in the video as participants (trainers) in their industry.*

*GRSA representatives advised that they would attend the property of the trainer where the video was taken the next day. They requested that RSPCA inspectors attend at the same time. Given that GRSA were attending and that would alert the person to the allegations made, RSPCA SA was unable to interrogate the information and had no opportunity to then do surveillance and potentially get legally acquired footage that could be used for evidence in court.*



This Review finds that there is weight in this submission. Given live baiting is a criminal offence under the AWA and attracts a maximum penalty of \$50,000 or four years imprisonment, the RSPCA investigation should have taken precedence over GRSA investigating a potential breach of rules of racing.

Had the persons allegedly involved not been alerted by GRSA's attendance, the RSPCA may have been able to undertake its own covert surveillance of the alleged conduct and thereby have obtained admissible evidence for a criminal prosecution. If the registered persons had been found guilty, GRSA could have relied on GAR Rule 174(7)(a) as a basis for disqualification (as the nature of the offence is such that the person's continued participation or association would be detrimental to greyhound racing).

In a public statement issued by the RSPCA regarding the live baiting incident in July 2022, the RSPCA stated that it had received legal advice that video footage taken covertly by unknown persons at a greyhound training property in Lewiston would likely be deemed inadmissible in criminal proceedings, due to the footage being obtained in contravention of the *Surveillance Devices Act 2016 (SA)*.

The RSPCA advised the Review that it is difficult to detect live baiting offences due to the deliberate attempts of participants to conduct the activity without detection, and the RSPCA lacks the resources to undertake surveillance.

The Review looked at the number and nature of matters GRSA has referred to the RSPCA by GRSA dating back to early 2015 which are summarised at Table 1 on page 107 and the action recorded by the RSPCA as having been taken (either by GRSA or the RSPCA).

The Review notes that concerningly, the most serious welfare related matters investigated by GRSA from 2020-2023 and included as case studies in this report do not appear on the table of matters GRSA has reported to the RSPCA, and by comparison, some of the matters which have been reported to the RSPCA do not appear to be serious. These concerns are revisited elsewhere in this report.

## Animal Welfare: GRSA Rules, Animal Welfare Policy and Compliance Regime

In addition to the statutory scheme under the AWA and Regulations, animal welfare in the greyhound racing industry is governed by the GAR (national rules), GRSA Local Rules and GRSA's Animal Welfare Policy (AWP).

The primary welfare offence under GAR is Rule 21:

### **21 Proper care for and welfare of greyhounds**

*(1) A person must ensure that any greyhound in the person's care or custody, is at all times provided with:*

*(a) proper and sufficient food, drink and protective apparel;*

*(b) proper exercise;*

*(c) kennels constructed and of a standard approved by a Controlling Body which are adequate in size, and which are kept in a clean and sanitary condition;*

*(d) veterinary attention when necessary; and*

*(e) appropriate treatment for the greyhound if the person is in charge of a sick or injured greyhound.*

*(2) A person must exercise the care and supervision necessary to prevent a greyhound under the person's care or custody from being subjected to unnecessary pain or suffering, or from anything which is likely to lead to unnecessary pain or suffering.*

*(3) A person shall not cause or permit, on any premises owned or occupied by that person, any condition that is likely to be dangerous to the health, welfare or safety of that greyhound.*

Breach of Rule 21 is deemed a Serious Offence by Local Rule 134(3) and must therefore be heard and determined by the IHP. In addition to GAR Rule 21, GRSA introduced Local Rule 131 "Ill treatment of a greyhound" in 2022 which essentially mirrors the ill-treatment of an animal offence under section 13 of the AWA.

Greyhound Racing SA advised it duplicated the AWA offences to ensure participants could be disciplined for ill-treatment of a greyhound. This approach does not appear to have been adopted in other jurisdictions and the Review notes it may tend to contribute to the tension between the RSPCA and GRSA, as GRSA purports to cover the field with respect to animal welfare issues concerning greyhounds, as the two authorities would be investigating the same person(s) for the same conduct, giving rise to elements of essentially the same offence, but for different purposes.

The Review queries whether Local Rule 131 was necessary, given:

- GAR rules contemplate that a controlling authority can take action against a person's licence if they are convicted of an offence against the AWA such that their continued participation or association with greyhound racing would be detrimental to the proper control and regulation of greyhound racing;
- GAR Rule 21(2) already provides that a person must exercise the care and supervision necessary to prevent a greyhound under the person's care or custody from being subjected to unnecessary pain or suffering, or from anything which is likely to lead to unnecessary pain or suffering (a Serious Offence under GRSA Local Rules);
- GRSA can also rely on GAR Rule 165 which provides an offence for a person to do any act or engage in conduct which is any way detrimental or prejudicial to the interest, welfare, image, control or promotion of greyhound racing (this could be deemed a Serious Offence for the purpose of GRSA Local Rules).

The GRSA Animal Welfare Policy (AWP) applies to all registered persons, of all licence types, and all registered greyhounds and retired greyhounds, that are in the custody and control of registered persons. The current AWP was introduced pursuant to a Steward's Notice on 5 October 2021 and repealed the 2018 Animal Welfare Policy.

The AWP is enforceable pursuant to GAR Rule 156(w), which states that an offence is committed if a person (including an official) fails to comply with a policy or code of practice adopted by a Controlling Body. A breach of GAR 156(w) is not deemed a Serious Offence for the purpose of Local Rule 134(3) and can therefore be heard and determined by the Stewards.

Greyhound Racing SA Welfare Officers carry out inspections of licensed participants to monitor compliance with the AWP and have powers to issue non-compliance notices where breaches are identified which may require rectification of issues identified within a certain timeframe. A follow-up inspection is often completed to confirm the issues have been rectified or alternatively a registered person may be required to provide photographic evidence to GRSA that the issues have been addressed.

The AWP expressly states that inspections may be unannounced:

***Kennel Inspections can be random and unannounced. Greyhound Racing SA Officers, pursuant to GAR18, can access your property at any time. This is regardless of whether you are home or not. In most circumstances you will be present in order to answer a range of different questions relating to the Policy.***

Unannounced inspections have been a source of tension between GRSA and participants over the years, with some participants believing GRSA welfare officers have no right to enter the property if the participant is not present. At times, welfare officers have been the subject of abuse and accused of trespassing, and police have been called to attend.

Greyhound Australasia Rule 16 states that a person authorised by a Controlling Body may at any time enter upon land or premises owned, occupied or under the control of a person bound by the Rules. It may be arguable that a registered participant therefore provides their consent to unannounced inspections when they become licensed, however the Review does not purport to provide a legal opinion on this point. GRSA welfare compliance officers expressed to the Review the importance of unannounced inspections in monitoring welfare standards.

Welfare compliance officers complete a premises inspection template on an iPad ticking Yes or No to various questions and specifying any non-compliant matters. The amount of detail provided appears to be dependent on the staff member who completed the inspection. The Review noted that the former template required important information which does not appear in the current template, including:

- How many greyhounds are currently housed on this property?
- Is kennelling address same as residential address?
- Who is responsible for the overall management and conduct of the greyhound establishment and for the welfare of the greyhounds housed therein?
- Who assists you with the care and management of the greyhounds at this property?
- Description of racing kennels including general construction
- How often are the kennels cleaned?
- Describe the cleaning method/ regime at the establishment?
- Are all watering and feeding utensils cleaned daily?
- How are pests including fleas, ticks, flies, mosquitoes and rodents controlled?
- Describe the feeding regime for racing greyhounds?
- Is exercise provided by:
  - allowing greyhounds access to an exercise or training area for at least 10 minutes twice daily; and/or
  - walking the greyhounds on a lead for at least 10 minutes twice daily; and/or
  - swimming, walking machine (treadmill), or galloping on an exercise or racing track?

Photographs were also inserted into the record as evidence of the non-compliant matters.

These questions require detailed answers rather than just “Yes or “No” and would provide more information to a manager determining whether enforcement is required or to another inspector carrying out a follow-up inspection. It is particularly important to record details about the cleaning and feeding regime and how many staff are responsible for the number of greyhounds at the address if inspections are only carried out at premises once per year.

The current “Full Premises Inspection” record includes a “Greyhound Audit” which inspectors use when they scan the microchip of each greyhound at the premises (including dogs awaiting GAP and greyhounds retired as pets) and record in the audit sheet the Microchip number, race name, sex and colour of each dog. However, the inspection sheet does not require the inspector to note how many dogs a trainer is recorded to have (as against GRSA records) prior to the audit being carried out and how many dogs were found at the premises. This information would provide a reconciliation snapshot and require an explanation for any discrepancy.

### Recommendation

Greyhound Racing SA to review format of Inspection record to require date of last inspection, more descriptive answers and include important questions which were previously asked in relation to care and management of property, cleaning and feeding regime, exercise regime, description of kennels and require photographs of non-compliant items to be inserted at relevant points as evidence and future reference.

### Recommendation

That the Premises Inspection/Greyhound Audit template should require the inspector to record how many dogs are registered against the participant prior to the audit being carried out and how many dogs were located at the premises, and require an explanation to be recorded for any discrepancy (in addition to the microchip audit).

## GRSA’s approach to animal welfare compliance

The Review found that GRSA Welfare officers have been diligent in their efforts to monitor and identify non-compliance by trainers with respect to animal welfare standards through their inspections of kennelling premises. However, this has not translated into disciplinary outcomes that would serve as personal and general deterrence for non-complying participants in their compliance with the AWP and GAR Rule 21.

GRSA’s last published outcome for an Inquiry involving welfare related breaches was in 2018 against a trainer in relation to general hygiene of his property. Greyhound Racing SA Welfare Officers had worked with the trainer on several occasions and previously issued directions in relation to rectifying general hygiene and maintenance issues with his property. The trainer was charged with failing to comply with the AWP and disqualified for six (6) months, suspended for 24 months on the grounds he did not reoffend under the same rule. Further issues were identified at a subsequent inspection which the trainer failed to rectify within 28 days. Stewards invoked the disqualification and the trainer was disqualified for 6 months.

At the July 2022 IWC meeting, non-compliance rates from kennel inspections were tabled for FY 22:

- 572 Licences inspected;
- 307 properties inspected;
- Roughly 30% non – compliant;
- Roughly 70% compliant.

The Agenda paper noted that participants with repeated non-compliance “do not appear motivated to improve their standards” and the only tool left to compel compliance is an Inquiry process which is costly for GRSA. It was also noted the impact that a financial penalty (or suspension) has for some industry participants.



As a result, GRSA amended Local Rule 93 (Penalties) to allow GRSA to specify when a direction given pending the outcome of an inquiry (such as a suspension or restrictions on nominations) commences, ends or impose a pre-condition to the removal of a direction. For example, GRSA could specify the commencement date of a suspension if a registered person needs time to make arrangements for the welfare of greyhounds in their custody or specify that a restriction on nominations will cease once the registered person provides proof, to the satisfaction of GRSA, that they have complied with an order in a non-compliance notice.

As a tool to tackle non-compliance regarding kennel standards, GRSA has placed conditions on nine trainers such that they are required to reduce their greyhound numbers by a certain amount within a defined period and in some cases suspended their breeder's licence, which cannot be reinstated unless they have compliant inspections for a period of time (e.g., 3 or 6 months).

The Review was very concerned to learn that 30% of kennels inspected in 2022 were non-compliant with the GRSA AWP. As there were so few published outcomes of welfare-related inquiries undertaken by GRSA, the Review undertook a close examination of inspection records of participants with the highest rates of non-compliance, as well as some investigation/inquiry files to evaluate GRSA's effectiveness in investigating and enforcing animal welfare related breaches. The issues identified are unpacked by several case studies below.

# Case Study 1

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Case Study 1 is lengthy, owing to the extensive history of non-compliance of a licensed trainer (P1) dating back to 2012 which has been set out chronologically to demonstrate the Reviewer's concerns as to why no action has ever been taken against the trainer under GAR Rule 21 or the AWP, despite numerous breaches.

## Inspection 2012

P1's kennels had declined to a poor standard and there was a stop placed on nominations. P1 was given 3 months to rectify the issues, which he did.

## Inspection 15/7/2015

An inspection by GRSA welfare officers found P1's kennels were non-compliant (details below are taken from the letter sent to P1 following the inspection with supportive photographic evidence):

- General hygiene was completely unsatisfactory. It was evident that the kennels had not been cleaned in a number of days. Both kennels contained large amounts of faecal matter and urine which the dogs were standing in and then walking over their bedding. Blankets/quilts that were in the kennels were wet and covered in faecal matter.
- Sleeping areas: All kennels contained filthy wet bedding that had obviously not been cleaned or replaced for quite some time.
- The water container in one of the kennels was empty.

P1 was warned that "GRSA treats matters of animal welfare with the utmost seriousness and failure to comply with the necessary industry standards may lead to sanctions and/or cancellation of your licence." A follow-up inspection was carried out to ensure the issues had been rectified.

## Inspection 9/3/2017

Welfare officers found the kennels needed better hot weather provisions (in breach of AWP)

## Inspection 7/12/2017

Welfare officers noted strong smell in kennels from drains and retired greyhounds need a raised bed (in breach of AWP).

## Inspection 7/6/2018

Welfare officers conducted a pre-whelping kennel inspection and found P1's kennels were non-compliant:

- Four kennelling areas were open to the elements (in breach of the requirement that housing must provide protection from the weather as well as protection from vermin and harassment from other animals).
- Some racing greyhounds did not have a raised bed with warm clean bedding. "This is non-negotiable" GRSA stated in a letter to P1.
- The paddock P1 proposed to be used for housing greyhounds did not have correct fencing and P1 was advised this would need to be erected before it could be used.
- P1 was also reminded that greyhounds should be given ample opportunity to empty out during the day as kennels contained a small amount of faeces.

P1 was notified of these matters by letter and advised GRSA intended to re-inspect his property within two weeks.

## Inspection 10/7/2018

Follow-up inspection found no issues had been rectified. P1 was issued with written directions:

- Ensure the greyhounds in the outside kennels have protection from the weather. It is unacceptable that on two occasions these greyhounds have been without protection from the elements as required by the SA Greyhound Industry Animal Welfare Policy.
- Ensure that general hygiene is maintained at all times. It is unacceptable that on two occasions kennels have not been cleaned at the time of an inspection. It was also noted at the time of the follow-up inspection that there was a distinct smell of urine in the racing kennels. You advised that urine had soaked into the beds. You advised that they would be replaced when beds could be afforded.
- Ensure that all greyhounds on the property have a raised bed and bedding. It is unacceptable that any greyhound on the property does not have a raised bed. Ensure that all greyhounds, racing or not have a raised bed and bedding.

Greyhound Racing SA advised that they would be reinspecting in the week of 11 July 2018 and failure to follow these directions may result in future action being taken, including stopping P1's ability to nominate until the matters are rectified, and him being directed to attend formal counselling in regard to animal welfare or appear before a Steward's inquiry.

GRSA reinspected on 12 July 2018 and no issues had been rectified. P1 advised that a power outage had prevented him from rectifying the issues.

GRSA reinspected on 16 July 2018 and all issues had been rectified. P1 was verbally advised that if there were any further issues a formal counselling session may be necessary.

### Inspection 28/12/2018

Welfare officers inspected P1's premises. Greyhounds Australia Rule 84A requires persons in charge of a greyhound to keep and retain treatment records detailing all vaccinations, antiparasitic and medical treatments administered to a greyhound from the time the greyhound enters their care until the greyhound leaves their care and from a minimum of two years. Such record must be produced for inspection when requested by a Steward or a person authorised by the Controlling Body. Failure to comply with the rules constitutes an offence.

P1 was unable to produce the treatment records for his greyhounds at the time of this inspection in breach of Rule 84A and was requested in writing to "familiarise yourself with GAR 84A".

The welfare officers also found two sections of the rear pup yard had broken wire and sheet metal, posing a risk to cut or injure the dogs. P1 was requested in writing to attend to these issues as a matter of urgency.

### Inspection 23/7/2019

An inspection by welfare officers found P1's kennels were non-compliant:

- Four outside kennels had no weather protection. It was also noted "the old pups and brood bitch in the front pup yard requires sufficient shelter to protect them from the elements. This is critical."
- All water containers had been chewed and needed replacing.
- Excess faeces in kennels and yards
- Chewed bedding needed replacing and chewed bedding from kennels and yards should be removed
- Offensive odour coming from the outside kennels due to clogged drain and pooled urine in outside kennel block of four kennels
- Protruding wire should be replaced immediately to prevent injury to greyhounds.
- Pup yard at the front yard does not have a raised bed.

In addition, dogs were not registered with Council. P1 advised that as he does not have mains water, kennels are only cleaned out every two days, not every day. GRSA wrote to P1 requiring that he rectify these breaches and advising the property would be reinspected on approximately 30/7/2018.

### Follow-up inspection 30/7/2019

Three out of ten non-compliance matters had been rectified:

- Chewed bedding had not been removed
- Drain had been unclogged, however the outside kennel block of two kennels had an odour and pooled urine in, or in front of, the kennels.
- Whilst old faeces had been removed from kennels and empty out yards, the pup yard still had excess faeces.
- A section of the four outside kennels still required repair for weatherproofing.
- The front pup yard still required sufficient shelter from the weather. This had been referred to as "critical" in the letter of 25/7/2019.
- The front pup yard still required a raised bed.
- No dogs were registered with council.

GRSA wrote to P1 outlining these continuing matters of non-compliance, notifying that his kennels would be re-inspected on approximately 15/8/2019.

### Follow up inspection 16/8/2019

Subsequent to a follow-up inspection on 16/8/2019, GRSA wrote to P1 advising they continue to have serious concerns about his property including:

- General cleanliness and hygiene of the kennels
- Lack of weatherproofing of all greyhound housing areas
- Lack of appropriate bedding and raised beds in sleeping areas
- Failure to comply with SA legislation by not ensuring greyhounds are registered with local council.

GRSA stated they wanted to work with P1 to rectify these issues and required him to attend a formal counselling session on 27/8/2019.

### Formal Counselling on 29/8/2019

P1 attended formal counselling on 29 August 2019 to discuss ongoing serious concerns at his registered kennel address. A number of agreed outcomes were reached to address the issues which were also outlined in writing to P1 by letter, including:

- Continued improvements to yards and housing within 3 weeks
- All sleeping areas must have 3 sides to them
- Ensure all greyhounds have a raised bed and bedding at all times.

### Inspection 24/9/2019

An inspection was conducted on 24 September 2019 and welfare officers found:

- One greyhound did not have water;
- There was an offensive odour coming from the kennel house. Greyhound Racing SA officers suggested that the kennel floor should be scrubbed regularly with a broom and disinfectant is left on floor for a longer period of time;
- Two kennels were without raised beds or bedding;
- Two of the outside enclosures were incomplete on three sides, exposing the greyhounds to the elements.

GRSA outlined these non-compliance matters by letter stating, "I trust you will attend to these matters as a matter of urgency and maintain all kennels accordingly."

### Inspection 18/10/2019

GRSA inspection sheet states:

*Very disappointing follow up and huge concern for greyhounds on property. Decision was made to trial greyhounds before finishing cleaning two of three kennel areas. Overtime various improvements have been made to the property including erecting new yards to appropriately house greyhounds with beds and bedding however still hygiene is a serious and ongoing concern. One greyhound with water that had been spilled over and faeces and urine in several kennels causing an offensive odour. Will recommend an inquiry to management.*

*Additional minor issue: splintered wood in door of yard had blood on it - advised [P1] to repair to prevent injury to retired greyhound housed therein Non-compliance notice provided however [P1] declined to sign.*

### Inspection 26/8/2020

Inspection found faeces in kennels but otherwise no matters of non-compliance were raised.

### Inspection 16/10/2020

Greyhound Racing SA inspected P1's premises on 16/10/2020 and found the following non-compliance issues:

- One greyhound was without bedding
- Kennels contained urine and faeces
- One greyhound without water due to chewing water container and knocking water over (discussed zip tying bucket and providing toys)
- General tidy up of debris in kennels required.



[Redacted]

### **Inspection 25/6/2021**

An inspection on 25 June 2021 found no issues of non-compliance.

[Redacted]

[Redacted]

### **Inspection 23/2/22**

Greyhound Racing SA officers inspected the premises and issued a non-compliance for faeces build up in and around kennels and protruding wire in kennels.

A follow-up inspection was attempted on 9 May 2022. The GRSA officer's notes state:

*“Attempted to do follow up inspection. [P1] and his partner asked us to leave, or they'd call the police. [GRSA] advised if we left, he'd have his licence suspended. There was a strong urine/faeces odour down driveway.”*

### **Stewards Inquiry on 29/6/2022**

A Steward's Inquiry was conducted in relation to this incident. Stewards found that on 9 May 2022, P1 had prevented the carrying out of a kennel inspection at his premises in breach of GAR16. Stewards suspended P1's registration for 4 weeks, fully suspended for 6 months from 29 June 2022.

### **Inspection 17/8/2022**

An inspection on 17/7/2022 found:

- Holes under kennels from rusted metal exposing greyhounds to the wind and elements
- Sharp wire sticking out in kennels that have potential to injure greyhounds housed therein.

P1 was required to rectify the breaches within 2 weeks and send a photo as proof of the same.

## Inspection 31/8/2022

Greyhound Racing SA Welfare Officers found several non-compliant matters and made the following notices in the inspection record:

*Welfare officers again have major concerns about the conditions at [address]. It is disappointing to find the conditions have deteriorated so much following improvements in his last inspection (17/8). It is evident that when an inspection is announced the property is cleaned, however when it is unannounced cleaning and maintenance of kennels does not occur. [GRSA] accompanied councils' officers to the property at approximately 12:18pm, [P1] not present but was contacted to return to the property.*

*The property was in a filthy state. Issues sighted are organised below:*

*Kennel house 1 - urine pooled in drains - urine pooled in one kennel - offensive odour*

*Empty yards - faeces had not been picked up at time of inspection*

*Kennel house 2 - urine pooled in drain - faeces in one kennel - holes had not been repaired timeline at last inspection (2 weeks - refer to NCN)*

*Day/spelling kennels - excessive faeces in kennels across from kennel house 3 - two kennels had brown water - rubbish wrappers in last kennel near rubbish mound*

*Kennel house 3 - urine and faeces in drain - old faeces inside one kennel to the side of shelter - urine in almost all kennels - offensive odour, burnt eyes particularly at the back of the shed - one greyhound with ripped up bedding, looks unclean due to brown stains*

*Pup yard - faeces in yard, officer auditing pups had faeces on her clothing from dog's paws*

*Council officers have concerns regarding no greyhounds being registered, health (waste management, pests (flies and other vermin) and no development application approval. One council officer identified in several areas corrugated iron used to make shelters posed a hazard to greyhounds that jump on it which has potential to cause injury. [GRSA] suggested using hose to put on top of the iron. Council officers to provide a report regarding the conditions at this property. Welfare officers believe that while [P1] has custody of this amount of greyhounds on the property, he is unable to meet the minimum standards stipulated by the animal welfare policy. As discussed previously we recommend that his greyhounds are reduced until he is able to consistently show he can meet standards during announced and unannounced inspections. A non-compliance notice was issued.*

The Council Officer recorded his observations at the property:

- Greywater disposed to surface and pooling. Increased fly activity was noted (non-compliant wastewater system)
- Two Sheds that greyhounds were kennelled were dirty with urine pooling on the floor, a channel in the middle of the shed diverting any liquid onto ground outside the shed. There was a strong odour present in the sheds and emanating from the shed.
- A pedestal fan in one of the sheds was covered in multiple soiled blankets.
- Large piles of dog faeces behind an outdoor dog pen. I asked how they dispose of dog faeces from the kennels, and they advised that they just throw it in the paddock.
- There was a large pile of household rubbish (4m x 4m x 1.5m). The pile contained a large amount of dog faeces, soiled dog beds, blankets, food containers. There was a large amount of fly activity around this site.
- On the other side of the property, I observed a septic tank and pooling black water from a failing soakage trench. This area of pooling black water had an unpleasant odour, and breeding flies. There were broken pieces of ceramic pipe present also. The system is clearly non-compliant.

**27/1/2023**

Inspection found non-compliant items:

- Strong odour in kennel area indicating insufficient attention to provide adequate ventilation for greyhounds
- Dirt, hair and/or debris present in kennel/s.
- Sharp corrugated iron in one yard to be capped to prevent injury to greyhounds.

A non-compliance notice was issued requiring compliance within 4 weeks.

**Follow-up Inspection 5/4/2023**

A follow-up inspection found some issues had been rectified, however further non-compliant items:

- Drain in kennel house needs to be cleared out
- Protruding wire in back right kennel house of 6. Protruding wire in several kennels in kennel house of 8.
- Offensive odour in kennels
- Debris and spider webs in area around kennels and downside of kennels
- Hole in kennel house containing 2 kennels.

**Follow-up Inspection 3/5/2023**

Inspection found breaches had not been rectified:

- Excessive faeces in yards, kennels and puppy yard
- Uncapped iron with rusted sharp edges in puppy yard
- Excessive urine in kennels
- Minimal water in kennels
- Water buckets/bowls are dirty
- No bedding in a number of kennels
- Blocked drains with foul odour in kennel areas
- Iron not capped
- Holes in kennels not repaired
- Excessive debris in kennels

**Dog reduction plan implemented 29/5/23**

P1 was placed on a greyhound reduction plan whereby he must reduce the number of greyhounds kennelled at his premises to 14 and maintain this over a period of time (3 months) and have compliant inspections for at least 6 months. His breeder's licence was also suspended.

**Inspection 1/6/2023**

Inspection found non-compliant items:

- Sharp wire present in kennel/s that have potential to cause injury to greyhounds
- Holes in kennel/s exposing greyhounds to the outdoor elements
- Faeces / urine present in kennel area indicating insufficient attention to allow greyhounds to empty outside their kennel area
- Strong odour in kennel area indicating insufficient attention to provide adequate ventilation for greyhounds
- Dirt, hair and/or debris present in kennel/s.

A non-compliance notice was issued requiring compliance by 9/6/2023.

**Follow-up Inspection 21/6/2023**

A follow-up inspection found:

- One water bowl was still dirty, others had been rectified.
- Protruding wire still in outside kennels
- Capping done in some yards but still required on outside kennels on corrugated iron
- Front yard behind the house with black dog has the ability to escape as fencing is low.

**Follow-up Inspection 16/8/2023**

A follow-up inspection found:

- Capping on fence in puppy yard and empty yard still needed to be addressed
- Hole in door in racing kennel at back of house
- Chewed mesh in one kennel and spider webs present
- General cleanliness needs to be addressed (urine and faeces).

**Follow-up Inspection 1/9/2023**

A follow-up inspection found issues had been rectified but noted "slow progress with removing the cobwebs".

**Follow-up Inspection 25/10/2023**

GRSA found the breaches had been rectified but the Welfare Compliance officers advised P1 would be subject to close monitoring and frequent inspections (3-6 months subject to any more issues).

## P1's Racing history

P1 has had a successful racing history.  
[Redacted]

## Discussion

As the chronology above shows, despite many instances of repeated non-compliance with AWP over a number of years, the only instance where P1 has been required to attend a Stewards Inquiry was in 2022 in relation to a charge of preventing the carrying out of a kennel inspection in breach of GAR16. He received a 4-week suspension, which was fully suspended for 6 months from 29 June 2022 (that is, he did not have to serve any period of suspension). This outcome has not been published on the GRSA website.

By way of comparison as to the penalty imposed by the Stewards, in the decision of GWIC v Lee (8 August 2023), Lee was a registered attendant who prevented GWIC inspectors from entering her premises for the purposes of carrying out a kennel inspection. Ms Lee refused to grant the Inspectors access to the property and was suspended on an interim basis pending disciplinary action. Lee pleaded guilty to the charge (GAR Rule 156(i)) and Stewards disqualified Lee for 9 months (this penalty was not suspended).

P1 continued to breach the AWP in the 6 months post the June 2022 inquiry. A GRSA welfare officer was so concerned regarding the state of the property and the welfare of the dogs that she organised for Council officers to accompany her to an inspection in August 2022.

The report provided by Council to GRSA following their inspection of the property on 31/8/2022 outlining their observations of the property revealed P1 did not have approval to use the land for intensive animal keeping and therefore the maximum number of dogs he could have on the property was three, and none of the 15 greyhounds kennelled at the property were registered on Dogs and Cats Online (DACO).

Another non-compliance notice was issued to P1 by GRSA as a result of the August 2022 inspection, however no charges have been laid against P1 to activate the suspended suspension imposed in June 2022 and no action has been taken against P1's licence in response to the letter from Council. Non-compliance notices were also issued to P1 at inspections conducted in January 2023, April 2023, May 2023, June 2023 and August 2023, none of which appear to have resulted in disciplinary action against P1.

GRSA's failure to enforce welfare standards with respect to P1 is inconsistent with the approach taken to the trainer who was disqualified in 2018 for failing to comply with the non-compliance order issued to him. The Review also notes that at an inspection in 2019 where the poor state of the kennels was discussed with P1, he advised he did not have access to mains water and was therefore unable to clean the kennels out every second day. On another occasion, when the issue of urine-soaked bedding was raised, P1 advised the beds would be replaced "when he could afford it".

In the circumstances of repeated instances of non-compliance, it is concerning that these issues did not prompt GRSA to reconsider P1's suitability to be licensed or result in restrictions on his licence prior to 2023. Throughout this period, P1 enjoyed a successful racing career and GRSA has on occasions, promoted his wins [redacted].



## Case Study 2

In a greyhound audit conducted in June 2021, a licensed trainer (P2) was identified as having two dogs missing, (D1 and D1). P2 was unable to provide details of where the dogs were or who they had been rehomed to. P2 was brought in for an interview and warned about his rehoming obligations and the forms that were required to be used. An order was placed upon him that from then on, P2 must rehome all his dogs through the GAP program.

A few months later, P2 was identified as having three more dogs missing (D3, D4 and D5) and was brought in for interview. He was unable to explain where the dogs were and effectively admitted he had “gotten rid of them”. P2 was charged with failing to notify GRSA that his greyhounds were retired contrary to GAR 106(3) and required to attend an Inquiry. Stewards found the charges substantiated but having regard to P2’s involvement in the industry, ordered a reprimand and further ordered that from 29/3/22, P2 is not to transfer or retire any greyhound in his custody or control without prior written consent of GRSA.

It is important to note this outcome was not published on the GRSA website under Integrity Outcomes and the written determination is dated 6 October 2023 (which postdates the Review team’s request to know the outcome).

According to the racing form for the missing dogs, D1 had only one start finishing 6th, and D2 had four starts, placing 5th and 8th in her last two races. D3 had 13 starts, no wins, failed to finish his second to last race and was suspended for 28 days and then placed 5th in his last race. D4 had eight starts and placed 5th in her last two races. There is no record of the dogs suffering any injury. These statistics would suggest that the motivation for retiring and the disappearance of the greyhounds was purely due to their form, not because of injury.

The Review team queried GRSA as to why this matter was dealt with so lightly, given P2 had previously been warned of his obligations in relation to retiring and rehoming greyhounds. GRSA advised that due to an error, the first order requiring P2 to rehome all his retired greyhounds through GAP, was given by oral direction only, and not followed up in writing.

Greyhound Racing SA also advised that because of this matter, Local Rule 130 was amended to include an offence for a registered person to rehome a greyhound to a third party in circumstances where they are aware, or ought to be aware, that the greyhound will be, or is likely to be euthanised or exist under conditions to its detriment to address this type of conduct.

By comparison, GWIC charged a registered participant with a breach of the GWIC Rehoming Policy for having a greyhound euthanised after his granddaughter sustained a minor injury to her finger during an incident involving the greyhound and made no attempt to rehome the greyhound through the GAP program in accordance with the GWIC Greyhound Rehoming Policy. The registered person was issued a 4-month suspension, which was suspended for 12 months. This decision is published on GWIC’s website.

## Case Study 3

On 8/2/22, GRSA Welfare Compliance Officers attended the registered premises of a registered trainer (P3) for a kennel inspection. Greyhound (age 4 years) was in the second kennel area and observed as very skinny, ribs and hip bones prominent and he had open sores on his back around his pin bones. P3 advised that the greyhound had previously been bitten by a white tip spider (in approximately 2020) and had gone downhill, been on a drip for several days at the vet and come good after a few months. P3 advised that the greyhound had not been well since early January but then declined in the last 2 weeks. He was unable to keep food down and they were feeding him milk and biscuits and he had begun losing weight:

When asked why he had not sought veterinary treatment P3 advised that the owner did not want to euthanise him. GRSA officers served P3 with an order requiring the greyhound be seen by a vet immediately. GRSA arranged an appointment with a vet for that afternoon.

GRSA officers also completed a notice of inquiry on the spot and suspended P3 from nominating any of his greyhounds in race meetings until the resolution of the inquiry.

P3 was very upset by this as he had already nominated dogs in races, threatened to hand in his licence and wanted GRSA to take the greyhounds off his property. P3's wife said she would find someone to shoot the dog and P3 claimed he would drop his greyhounds at the dog track and put them in the kennels as he has a key and said he would not feed them.

The Veterinary examination report stated:

*On examination, dog has large open sores over hips and is in 2/9 body condition. Owner reported dog was bitten by spider in past and this would fit with lesions seen on dog. Owners have been trying to get dog's condition back up, but dog has been vomiting so weight loss has continued. Given chronic nature of condition and welfare of dog euthanasia was performed.*



Stewards determined the Inquiry on 14/2/22 and found the following charges substantiated:

- Omitted to do a thing namely reasonably consider all treatment options for [Greyhound] which was negligent in breach of GAR 86(o); and
- Impeded a member of the Controlling Body namely an Animal Welfare Officer, by arguing during a kennel inspection (GAR 86(g)).

Stewards lifted the suspension imposed by the welfare officer 7 days previously and issued a reprimand noting “the greyhound was not actively racing and was, essentially at the time, considered a pet.”

This is difficult to accept given the greyhound was housed in a racing kennel in that condition, not inside as would be expected for a pet. According to his racing history, the greyhound had not raced since November 2020 but had remained in a racing kennel at P3's premises despite not racing for over a year.

This outcome was not published on the GRSA website and was only written up on 6 October 2023 following the Review team's request to see the outcome. It is not clear as to why P3 was not charged with breaching GAR Rule 21(d) which requires a person to ensure that any greyhound in their care or custody is at all times provided with veterinary attention when necessary. This is deemed a Serious Offence for the purposes of GRSA Local Rules and would have been required to be heard by the IHP.

The Review also notes that the RSPCA was not notified when arguably P3 could have been charged with an offence under s 13(2) of the AWA, namely failing to take reasonable steps to mitigate harm suffered by the animal.

By comparison, in NSW a registered participant was charged by the RSPCA and convicted with offences under the Prevention of Animal Cruelty Act (POCTA) for failing to care for and provide necessary veterinary treatment to two retired greyhounds in his custody. He received a period of imprisonment which was to be served by way of Intensive Correctional Order in the community. GWIC veterinarians considered the images of the greyhounds which had been seized by the RSPCA and they were determined to be in an emaciated body condition. The registered person was suspended pending disciplinary action. Stewards held an Inquiry and found that the nature of his offending was such that his continued participation or association with the greyhound racing industry would be detrimental to the proper control and regulation of greyhound racing pursuant to GAR Rule 174(7)(a) and disqualified his owner licence for 3 years. This decision is published on GWIC's website.

## Case Study 4

Greyhound (G1) was whelped in 2008 and raced from November 2009 to November 2012 under registered trainer (P4) and was then retired. She remained “retired as a pet” in a kennel at P4's premises from that time.

On Wednesday 29 September 2021, P4 called GRSA to advise he was going to take G1 to the vet to be put down on Saturday because she had hurt her shoulder. The vet then contacted GRSA to advise that after speaking with P4, the injury sounded severe and believed it could not wait until Saturday to be euthanised.

GRSA contacted P4 to find out more information about the injury. P4 advised G1 had “smashed” her shoulder out in the run and the shoulder was hanging down. GRSA welfare officer expressed concern that the dog should be taken to a vet asap and P4 advised he could provide some pain relief (Advil). GRSA told P4 this would not be sufficient and suggested P4 take G1 to the vet the following day (Thursday). P4 said he could not as he had a doctor's appointment and was racing Friday so wanted to euthanise her on Saturday as then he could be with her.

Due to concerns for the welfare of G1, the GRSA welfare officer sought approval from management to pay the difference in cost for a Veterinary Hospital to euthanise G1 and contacted P4 to propose this alternative solution. P4 advised he only had \$3 in his account which is why he was waiting until Saturday to see the vet [redacted]. P4 advised she had been fine, and the injury had not just occurred. Greyhound Racing SA queried when the injury had occurred, and P4 advised 25 September (4 days previous). GRSA advised P4 that GRSA would pay the entire bill at the Animal Hospital and P4 then agreed to take her in. G1 was seen by a veterinary clinician that evening.

The examination report stated:

*On the evening of 29 September 2021, [P4] presented [G1] for euthanasia. [P4] reported that [G1] was “running in the runs” and “turned at the end” resulting in an injury to the left shoulder. [P4] noted that he suspects that the shoulder is fractured. [P4] noted that this injury happened “last week”. [P4] reported that she “couldn’t get up if she fell down” and that she then would “mess herself”. [P4] also noted that a “hard lump” on her right lateral stifle “burst” two days ago (he said this as he put his finger in the wound and pushed serosanguinous discharge from the site).*

*\*\*Further history was not obtained due to [P4's] abrupt manner and concern for the patient's welfare\*\**

The report also stated (emphasis added):

*Coat caked with excrement. On R lateral stifle is an alopecic, erythematous swelling with central full thickness wound that oozed serosanguinous, purulent discharge. Surrounding this swelling is crusted excrement.*

*Based on clinical examination today, I think it is unlikely that this patient's condition is only of a 1 week duration solely due to the reported primary traumatic injury. The marked swelling of the L scapular region along with severe pitting oedema of the LFL appears more consistent within osteosarcoma or other neoplastic process. It is possible that the traumatic event reported by the owner caused a pathological fracture at the site (this is speculation).*

*The wound on the lateral aspect of the right stifle appears to be consistent with a pressure wound/sore. **The low body condition of this patient along with the degree of excrement adhered to the coat suggests that this patient was not being provided with adequate care.** Unfortunately, a thorough examination (with gait assessment, measurement of pathologies identified etc) could not be performed due to [P4] becoming impatient as well as not wanting to further prolong [G1's] suffering. Based on the history and examination findings, euthanasia is recommended on humane grounds due to the condition and the pain that the dog is currently suffering.*

*Following the euthanasia procedure, the report indicates [P4] promptly picked up the patient's deceased body and took out of the building without further photographs or documentation allowed. Ideally a radiograph would have been performed post-mortem to confirm the above differential, but [P4] requested that he take [G1] home for burial immediately post-euthanasia.*

*The veterinary clinician also stated for the purposes of reporting to GRSA: **“It is my professional recommendation that an inspection of [P4's] property is conducted in the near future due to concern for the remaining greyhounds that are under his care.”***

Photographs were taken of G1's condition before she was euthanised, see below right.

The Review notes that G1's last race was in 2012 and that she remained in a racing kennel at P4's premises for 9 years until she was euthanised in September 2021. P4 has been licensed as a trainer since [redacted]. In 2023 he has had [redacted] starts.



Following the incident involving P4, Stewards opened an Inquiry on 30 September 2021. On 21 October 2022 (over a year later), Stewards found the following charges substantiated:

- Negligence in breach of GAR Rule 86(o) for failing to consider all treatment options for [G1]; and
- Engaged in conduct, namely belligerence with a veterinary practice which was detrimental to the image of greyhound racing in breach of GAR Rule 86(q).

Stewards noted the greyhound was retired as a pet and stated:

*“Before 1 May 2023, retired greyhounds were not subject to the full force and effect of the Greyhounds Australasia Rules (as is now the case). The greyhound was suffering from terminal illnesses whereby, overall, euthanasia was in the best interests of the greyhound, despite the sorrow this would cause.”*

Having regard to the nature of the offences and P4's involvement in the industry, Stewards ordered P4 be reprimanded with respect to both charges.

The Review considers this matter to be extremely serious given the report of the veterinary clinician who examined G1, and her observations and the concerns that she expressed to GRSA concerning any other dogs which remained in the care of P4.

The conduct concerning G1 appears to constitute a potential offence under the AWA, yet GRSA did not report the matter to the RSPCA. Despite this report, no other action was taken by GRSA with respect to the greyhounds which remained in P4's care and GRSA did not conduct an inspection of his premises until 1 June 2022.

Greyhound Racing SA advised with respect to the outcome in this matter that at the time of this conduct, the GAR, AWP and GRSA Local Rules did not apply to retired greyhounds which is no longer the case. The Review notes this has no bearing on GRSA's obligation to report the matter to the RSPCA, but rather reinforces it.

The Review also notes that audits of P4's premises and greyhounds on 1 June 2022 and 4 May 2023, respectively, showed that he continued to have retired racing dogs in kennels. For example, G2 had last raced in 2013, G3 last raced in 2013 and G4 last raced on in 2019.

There are no provisions under the GAR, Local Rules or AWP which prohibits a registered person retiring a racing greyhound to themselves and keeping it in a kennel for the rest of its life until it dies, however this Review was surprised and saddened to find this practice is occurring, as it seems to be at odds with the concept of “retirement” and rewarding a racing greyhound with a new phase of life in a more nurturing environment than a racing kennel.



## Case Study 5

P5 was registered as a trainer from 2015 to 2022. In July 2021, he notified GRSA that he was retiring two of his racing dogs to be rehomed through GAP, but did not arrange their GAP assessments until 2022. Due to GRSA's concerns regarding the condition of the dogs at their GAP assessment, a veterinary assessment was undertaken of the two dogs - which found:

- One greyhound was flea infested with flea dirt and bites all over him and had suffered weight loss as a result. He also had a tail fracture that was over a week old, with an open wound, requiring amputation and needed 10 teeth removed.
- The other greyhound had a large lump on left wrist where his bones had reacted to a plate from a previous surgery and required surgery.

In an email from a GRSA Welfare Compliance Officer to the Risk & Compliance Manager on 1 July 2022, the officer wrote:

*Jesus this is so messed up. He needs to be reported to the RSPCA. Can we please work on getting the rest of his dogs out of there asap. We have organised a place for all the dogs. We are working on Sunday, happy to hook up the trailer and go grab them. If this isn't a reason for disqualification, I don't know what is.*

P5 consented to GRSA removing all of his dogs and was required to attend an inquiry in relation to a number of charges including ill-treatment of a greyhound. He did not attend, and his registration was cancelled. GRSA did not report P5 to the RSPCA, despite charging him with ill-treatment of a greyhound.

## Case Study 6

In 2021, welfare officers received a tip-off from another participant that trainer (P6) had a greyhound in poor condition. Greyhound Racing SA conducted an inspection on 11 October 2021 and found a greyhound, extremely underweight. Greyhound Racing SA took the dog for veterinary examination, and he was found to have a large tumour and had to be euthanised.

An Inquiry was not held until 26 April 2022, which P6 failed to attend. Stewards cancelled P6's registration "noting [P6] was not active in the greyhound industry and did not possess any greyhounds at the time of the inquiry." GRSA did not report this matter to the RSPCA.

The photograph below shows the condition of the greyhound prior to being euthanised:



# Case Study 7

P7 is a licensed trainer in SA. On 21/1/2020, GRSA issued a non-compliance notice for a breach of GAR Rule 84A, as P7 had lost his treatment book and the kennel house was unclean. On 14/2/2020 P7 was issued a non-compliance notice for a breach of GAR 84A (treatment book not up to date) and his whelping box being too small, as well as hazards in the pup yard which needed removing.

An inspection on 6/9/21 found P7 had failed to keep his treatment book up to date and was issued a non-compliance notice.

A further inspection was conducted on 17/3/2022 which found the treatment book was again not up to date, and there was no raised bed in pup yard. A follow-up inspection on 10/6/2022 found there was no water in the pup yard and that there were hazards in the pup yards (bricks).

A full premise inspection was conducted on 13 October 2022 which found wet and dirty bedding in pup yards which needed to be replaced, and hazards in the pup yards (brick and protruding wire), a large hole in pup yard to be filled in, and corrugated iron around pup yards was sharp. A non-compliance notice was issued.

On 9 March 2023, GRSA received a complaint regarding P7 via KnowTellProtect from P7's landlord stating that she has many people contacting her about said participant and the care of his animals. The email stated the greyhounds are not in a proper facility to house greyhounds, they are never let out of the house for any exercise and are in very poor condition. The landlord provided the address of the property and explained that P7 was never given permission to leave them locked up in a bedroom of the house, and that the dogs have not had any form of vet care, and there had been litters of puppies with no vet consultant. The landlord states "[they] would very much appreciate if they were seen by a member of your racing committee to make sure they get the appropriate care".

GRSA inspected his premises on 31/3/2023 and issued a non-compliance notice in relation to sharp wire protruding, corrugated iron, old mattress, faeces in yard, and dirty water. GRSA inspected P7's premises on 30/10/2023 and found non-compliant issues, including protruding sharp wire in kennels from mesh, faeces in yard, holes and debris in yard, treatment book not maintained, and dogs not registered with council. P7 was given 21 days to comply.

Despite repeated non-compliance, P7 has never been charged with a breach of the AWP or GAR with respect to the condition of his properties. In 2020, he was charged with Failing to Seek Veterinary Treatment in breach of GAR 106(1) (now Rule 21) with respect to a greyhound but was found not guilty by the IHP.

By comparison, GWIC charged a registered owner trainer with the following breaches:

- GAR Rule 21(3) – permitted condition of his premises to be in a condition that was likely to be dangerous to the health, welfare or safety of any greyhound in his custody

During GWIC's inspections, Inspectors found that the kennels and yards at the property had damaged wire fencing, rusted walls and gates that were damaged and worn. The status of the kennels and yards were such that they were a hazard to greyhounds kept in them.

- GAR Rule 21(1)(c) - Failed to keep the kennels at this premises in a clean and sanitary condition

During the inspections conducted by GWIC Inspectors on 10 November 2022, 28 November 2022, 30 November 2022, 14 December 2022 and 25 January 2023, the kennels at the premises were found to be in an unclean and unsanitary condition.

- GAR Rule 151(1) and (2) - Failed to keep and produce treatment records related to greyhounds in his care

During the inspections on 10 November 2022, 28 November 2022, 30 November 2022, 14 December 2022 and 25 January 2023, the trainer was asked to produce the treatment records relating to the greyhounds in his care but was unable to provide the treatment records as requested.

The trainer was suspended on an interim basis pending disciplinary action. Stewards imposed penalties of:

- Charge 1: 4-month, 2-week disqualification;
- Charge 2: 3-month suspension;
- Charge 3: Fine of \$375.00

## Case Study 8

P8 has been licensed as a trainer in SA for a number of years.

On 10 February 2020, an inspection was undertaken at his premises with a number of breaches of the Animal Welfare Policy identified:

- Treatment book not up to date
- Bedding soaked with urine
- Low water levels
- Unhygienic kitchen
- Build-up of faeces in runs

A non-compliance notice (warning) was issued specifying action required to rectify the breaches. A follow-up inspection was conducted on 6/3/2020 and found that the water bowls spilling had not been rectified and it was suggested P8 try zip ties or weights in water bowls to stop them spilling.

Following an inspection on 1/6/21, a warning was issued to P8 in relation to one greyhound without water (had spilled out) and a dirty fridge. An inspection on 10 November 2021 found his treatment book was not up to date and water levels were low. A warning was issued.

An inspection on 8/6/22 noted minimal water in kennels and one greyhound without water. P8 advised he was in the process of cleaning up and that is why the dog did not have water. One of the greyhounds had suffered a white tip spider bite and had attended the vet two weeks ago. An inspection on 21/10/2022 found excess faeces in runs, debris in kennels and old bedding needed replacing as it was causing a strong smell.

On 3/5/2023, welfare officers attended the kennel address for an unannounced inspection. Within the kennel house, the officers noted numerous breaches of the AWP:

- Soiled, inadequate bedding in need of replacement.
- Excessive spider webs within and throughout the kennels which was alarming as one of his greyhounds had reportedly been bitten by a whitetail spider in 2022 causing ongoing health issues which resulted in two toes rotting off and required leg amputation.
- Excessive urine within the kennels indicating that they had not been cleaned out recently.
- A strong and offensive odour was notable upon approach to the kennel house.
- Greyhounds in 2 kennels were without water – all other kennels had minimal water.
- Unhygienic fridge – fridge was heavily soiled with blood and old meat. There was also dried blood and bits of raw meat on a table within the kennel house. The standard of hygiene throughout the kennel house was very poor.
- Large amount of faeces piled up outside of the kennel house in front of the empty yards.
- Greyhounds had overgrown nails.

This matter resulted in an Inquiry before the IHP where P8 was found guilty of:

- Threatening a Steward contrary to Rule 156(g)(iv), GAR
- Breaching the Animal Welfare Policy in relation to the breaches identified on 3 May 2023 contrary to Rule 156(w)
- Engaging in contemptuous conduct in relation to the Controlling Body contrary to Rule 165(c)(i), GAR

(P8 was also charged with 3 other offences of which the IHP did not find him guilty).

On 28 July 2023, the IHP imposed a single penalty in relation to the 3 charges he was found guilty of, namely 9 months which was suspended for 12 months after serving 3 months. The suspension was backdated to 5 May 2023 when his licence was suspended pending an Inquiry by GRSA.

The decision of the IHP was not published on the GRSA website and the written determination (which is dated 6 October 2023 after the Review requested to see it) does not contain any details of the breaches or how the IHP arrived at the penalty.

The Review notes that the approach taken by GRSA in this matter appears to be inconsistent with the lack of any enforcement action taken against P1 prior to the Steward's Inquiry in 2022.



# Incident involving trainer striking a dog

The Review received information that an incident occurred at the Angle Park track in October 2022 involving a trainer striking a greyhound. A GRSA staff member had heard a dog yelp, turned around to see it cowering and suggested the steward review the CCTV footage to find out what had happened. The Review requested to view this footage. It shows a trainer react to his dog sniffing the dog in front of him by punching or striking his dog in the face with what appears to be a clenched fist. The dog cowers with his tail between his legs in response.

The Review queried with GRSA why this matter did not result in an Inquiry and was not reported to the RSPCA.

GRSA advised:

*the welfare team drew the incident to Stewards' attention and the matter was discussed. CCTV viewed. [The Trainer] was spoken to by the [redacted] about the matter. He initially denied it, but when advised there was CCTV, he admitted hitting the dog. His reason was that he held a view that he did not like his dogs smelling other dog's anal areas due to the possible transfer of worms and he instinctively reacted. He did not intend to mistreat the dog. The matter was not reported to RSPCA as this was not considered, given the type of strike. Re no Inquiry record, in hindsight this should of have occurred; however, at the time of this matter, Stewards were struggling with workload over a number of other matters [redacted] and it was overlooked. Stewards warned [the trainer] regarding his conduct.*

The Review notes that this incident occurred on 13 October 2022. On 24 October 2022, Stewards suspended the trainer for abusing a member of a greyhound racing club and he remained suspended for 73 days until the Inquiry was heard on 4 January 2023.

## Conclusions on welfare related outcomes

Table 2 on page 109 provides a summary of all welfare related investigations and inquiries undertaken by GRSA from 2020-2023. Based on that table, and the case studies outlined above, it can be concluded that GRSA is not adequately or effectively enforcing its own Animal Welfare Policy or the welfare provisions of the GAR/Local Rules against participants.

As the table shows, most matters have resulted in either a reprimand, suspended suspension, or closure with guidance/counselling and no charges laid. The only licences which have been cancelled involved persons who were no longer racing. Greyhound Racing SA's apparent reluctance to impose a suspension or disqualification which would result in the participant being unable to race for a period (rather than a suspended suspension or reprimand) sends a condoning rather than deterrent message to industry, is inconsistent with welfare related disciplinary outcomes in other jurisdictions and may be indicative of "industry capture".

Greyhound Racing SA's reluctance to impose a suspension or disqualification may stem from the impact upon race nominations if a trainer is prohibited from racing for a period. For example, the Review heard from GRSA staff and participants about the impact that the suspension of the trainers involved in the live baiting allegations in 2022 and the alleged physical cruelty incident in 2023 has had on race nominations. This is an issue which flows from the small number of large trainers as highlighted earlier in the report.

Greyhound Racing SA also expressed their concerns regarding the impact that suspension or disqualification can have upon a trainer's financial circumstances which could in turn affect the welfare of greyhounds in their care, and the risk that the trainer might surrender their dogs to GAP, which would place even more pressure on the waitlist. The Review acknowledges the validity of these concerns, however ultimately, they should not take precedence over adequate enforcement of welfare standards in the industry.

The case studies show instances where participants could have been charged with Rule 21, GAR offences which are deemed Serious Offences which would need to be heard by the IHP, yet they were charged with negligence (re kennel standards, veterinary treatment) which is not a Serious Offence. Based on our discussions with [redacted], this reluctance appears to be driven by perceived difficulties with IHP hearings – the time and effort required to prepare a brief, difficulties in proving charges, the cost of hearings, difficulties in getting the IHP to sit (availability is an issue and even though they can sit as one member, they choose not to).

This Review is not in a position to resolve those issues (and notes they require closer attention by the Reform Inspector), however they are highlighted because difficulties with the IHP model is not a valid reason to not be charging participants with Serious Offences such as GAR Rule 21 if the alleged conduct gives rise to that offence, and warrants such action, particularly given the penalties which apply.

The GRSA Penalty Guidelines specify a minimum starting point of three-year disqualification for a first offence against GAR Rule 21, five-year disqualification if the person has a breach within the previous three years and life disqualification for a second or subsequent rule breach in the previous five years.

The Review queries whether GRSA's reluctance to charge participants under GAR Rule 21 - for conduct which establishes such a breach – stems, in part, from GRSA's concern regarding the impact disqualification of trainers could have on race nominations, given the limited numbers of trainers who hold large numbers of racing greyhounds. In any event, registered persons are not being held accountable to the national rules by the Controlling Authority.

Greyhound Racing SA's decision to not publish welfare-related outcomes out of concern for the participants' privacy is inexcusable, inconsistent with other jurisdictions and only serves to reinforce the public's concerns regarding a lack of transparency which have been expressed time and time again in the lead up to this Inquiry being commissioned.

It is reasonable to infer that the lack of any published outcomes has contributed to repeated non-compliance with animal welfare standards, as there has been no deterrent message sent to industry that animal welfare standards are upheld and enforced.

Prior to this Review being commissioned, the footage of greyhounds being physically beaten was a shock to the public, and prompted the government's response to inquire further as to how prevalent such issues are in this industry. Having now reviewed the animal welfare related matters that have not been disclosed to the public or reported to the RSPCA, that footage does not seem shockingly out of place when viewed in the context of other serious incidents of greyhounds being poorly treated – the only difference being that the footage was in the public realm.

It is ultimately a subjective question as to what is worse – physically beating a dog or leaving it in a kennel suffering when it needs urgent veterinary attention, or leaving dogs in consistently unhygienic kennels with pooled urine and built-up faeces over many years.

However, subjectivity does not rule the day when accountability is in question, as Parliament has enacted laws regarding the ill-treatment of animals which are criminal offences to be enforced by those authorised under the AWA to prosecute such offences.

Greyhound Racing SA's Annual Report for 2015-2016 (post the live-baiting documentary aired by Four Corners) contained the following "Animal Welfare Statement":

*GRSA remains unconditionally opposed to the notion that animal cruelty can ever be an acceptable outcome associated with the training of greyhounds. ... GRSA is committed to ensuring that animal welfare considerations are central to decision-making and that a 'zero tolerance' approach will be applied to any discovery of welfare-related breaches by registered participants. In accordance with the Animal Welfare Act 1985, GRSA is compelled to provide timely and faithful notifications to the RSPCA of SA, SAPOL or both of known or suspected animal welfare breaches.*

Based on the findings of this Review, it cannot be said that GRSA has fulfilled this statement. GRSA's failure to report serious incidents of ill-treatment of greyhounds to the RSPCA is contrary to their stated aim of prioritising greyhound welfare and calls into question its suitability as the Controlling Authority of greyhound racing. This is particularly concerning when its own welfare compliance officers requested particular matters be reported to the RSPCA, but alarmingly, these requests do not appear to have been actioned by management.

The Review recommends the government give consideration to amending the *Animal Welfare Act 1985* to mandate the controlling authority for greyhound racing to report potential breaches of the Animal Welfare Act and Regulations to the RSPCA.

As stated earlier, the relationship between GRSA and the RSPCA is critical if greyhound welfare is to be upheld in South Australia. In addition to mandated reporting, the Review has also considered the issue of the *subjective* nature of referrals. For example, what GRSA considers to be a breach of its Animal Welfare Policy, the RSPCA may consider to be a breach of section 13(2) of the AWA and the problem of selective reporting may continue.

This could be overcome by regular (scheduled) and formalised meetings with the RSPCA where all new animal welfare non-compliance matters are discussed and if a matter gives rise to potential AWA breaches, agreement can be reached as to whether the matter should be investigated by the RSPCA or GRSA, or in some cases, by both authorities. GRSA may also need to consider amending the Local Rules to overcome any privacy issues, and formalising an MOU with the RSPCA to ensure necessary information sharing can occur.

Ideally, in addition to the above and subject to capacity, a RSPCA inspector should sit on the Integrity Welfare Committee to have input into animal welfare issues discussed at that forum. If this cannot be achieved, the outcomes of the RSPCA/GRSA regular meetings can be tabled as a standing item at IWC meetings.

### Recommendation

Government to consider, in the context of the review of the *Animal Welfare Act 1985*, to mandate the controlling authority for greyhound racing to report suspected breaches of the Animal Welfare Act and Regulations to the RSPCA.

### Recommendation

Chief Inspector of the RSPCA (or his/her delegate) to meet regularly (minimum 6 times per year) with General Manager, Integrity and Welfare, GRSA to discuss all animal welfare investigations and complaints received, to identify any matters that should be referred to RSPCA for investigation, as well as any participants leaving the industry. All matters that are referred must be in writing and a record kept by both authorities.

### Recommendation

Government should consider allocating funding to appoint a full-time animal welfare officer at the RSPCA dedicated to greyhound welfare.

### Recommendation

Greyhound Racing SA to consider amending the Local Rules and formalising an MOU with the RSPCA to ensure necessary information sharing can occur.

### Recommendation

GRSA must publish all outcomes of Steward Inquiries or IHP hearings that have not been published before 1 January 2024.

### Recommendation

The Greyhound Industry Reform Inspector is to be consulted before any welfare-related investigation is to be closed with no charges laid.

## Greyhound Racing SA Animal Welfare Policy

Greyhound Racing SA has an Animal Welfare Policy (AWP) published in 2021 in respect of greyhounds that are in the custody of participants or GRSA themselves. This is important as greyhounds awaiting rehoming each year will be in the custody of GRSA at holding kennel facilities near Adelaide. The policy provides standards and welfare responsibilities for registered persons covering:

- Overall management of all registered greyhounds in their custody and control.
- Animal husbandry
- Animal health
- Training (where licensed)
- Veterinary care

Generally, the policy is based on both experience of the regulator and Greyhounds Australasia guidance. It is also cognisant of four relevant Acts including the *Animal Welfare Act 1985*. The Review considered these policy standards against the NSW Greyhound Welfare Code of Practice (published May 2020) and the Code of Practice for the Keeping of Racing Greyhounds in Victoria (published 1 January 2020). There are a number of areas where GRSA could amend their animal welfare policy in line with the NSW Greyhound Welfare Code of Practice to provide better standards in South Australia. These are explored below.

Part 5 of the NSW Greyhound Welfare Code of Practice details standards required when housing greyhounds in New South Wales. This includes the following sub-components:

- Construction of housing pens
- Kennels and yards
- Indoor housing
- Greyhound housing area space requirements
- Housing and environment
- Sleeping areas
- Tethering
- Housing greyhounds for breeding and whelping
- Cleanliness and hygiene
- Preventing transmission of disease
- Pest control and Emergency evacuation procedures.



In respect of housing and space requirements, the NSW Greyhound Welfare Code of Practice prescribes the following minimum space requirements for greyhound housing areas (see below).

Greyhound Racing SA's minimum standard kennel size for racing greyhounds is 1 metre wide and at least 2.4m squared. By comparison, the NSW standard is 1.2m wide, 1.8m high and total area of 3.5m. The GRSA policy refers to racing kennels being designed to 'encourage rest'. The Review finds that this requirement is likely to create a perception that greyhounds should be discouraged from free movement when in racing training and is against the broader enrichment fundamentals that greyhounds require and are covered at a later point in this report.

The Review recommends GRSA adopt the minimum space requirements for greyhound housing areas as outlined in the NSW table below, noting this would not apply to retired greyhounds that are retained by participants as a breeding dog or pet.

Housing requirements for retired, spelling and GAP greyhounds are the subject of further commentary later in this section.

### Recommendation

GRSA to adopt the minimum space requirements for greyhound housing areas as outlined in Part 5 of the NSW Greyhound Welfare Code of Practice.

## Minimum space requirements for greyhound housing areas (NSW Greyhound Welfare Code of Practice)

Minimum requirements for one greyhound			
Enclosure type	Minimum width	Minimum height	Total area
Pen (includes kennel)	1.2 metres	1.8 metres	3.5m <sup>2</sup>
Minimum requirements for two greyhounds			
Pen (includes kennel)	2.4 metres	1.8 metres	7m <sup>2</sup>
Mating Greyhounds Pen	3 metres	1.8 metres	15m <sup>2</sup>
Minimum requirements for whelping greyhounds			
Whelping box or area for dam and litter of pups aged up to 4 weeks	A whelping box or other area used for whelping must be large enough for the dam to lie comfortably while whelping and accommodate the dam and her puppies for the first four weeks after whelping.		
Whelping Greyhounds Pen (includes kennel)	For a dam and litter of puppies aged over 4 weeks.		15m <sup>2</sup>
Whelping greyhounds housing pen (includes kennel)	One dam and her litter of pups aged over 8 weeks require an additional 15m <sup>2</sup> of space.		30m <sup>2</sup>

## Tethering

The GWIC policy at 5.13/5.14 states that greyhounds must be supervised when tethered and that greyhounds must not be tethered for more than two hours per day. The GRSA Animal Welfare Policy 2021 states that greyhounds must only be tethered for a short period under constant supervision. It also states that greyhounds should not be tethered permanently or as a long-term restraint. Greyhounds being tethered on a leash is quite different to a greyhound being leashed for walking purposes. A greyhound should only be tethered by leash for the minimum practical time.

### Recommendation

GRSA Animal Welfare Policy 2021 should be amended to make expanded and specific reference to tethering. A policy position should be that greyhounds are only to be tethered for the minimum practical time and for no more than two hours. If a greyhound is tethered for any period of time, it should be provided access to water.

## Pest Control

During the Review inspections were conducted of several kennelling facilities in South Australia. At a number of these inspections spiderwebs were sighted close to kennels. On more than one occasion trainers at these sites spoke of having to treat greyhounds for spider bite. The Review also noted when inspecting Notification of Deceased forms that greyhounds have died of snake bites.

It is important that greyhounds when kennelled are not exposed to pests and vermin. Both the GRSA AWP and The Code of Practice for the Keeping of Racing Greyhounds in Victoria do not specifically mention pest control however the GWIC policy in NSW does cover the issue. Part 5, 5.26-28 states:

*(5.26) Safe and effective measures must be taken to control pests and vermin (including fleas, ticks, flies, mosquitoes, snakes and rodents) in greyhound housing areas.*

*(5.27) Pest control chemicals must be kept in their original container and used and stored in accordance with the manufacturer's instructions.*

*(5.28) Greyhounds must be removed from any areas where and while noxious pest control chemicals are being used.*

Greyhound Racing SA would benefit from adopting the GWIC policy regarding pest control in order to provide clarity to its participants regarding the importance of ensuring greyhounds are not facing threats from dangerous pests. Greyhounds when kennelled have no opportunity to retreat from such threats.

### Recommendation

GRSA should adopt the following policy regarding pest control in both indoor and outdoor kennel facilities:

- Safe and effective measures must be taken to control pests and vermin (including fleas, ticks, flies, mosquitoes, spiders, snakes and rodents) in greyhound housing areas.
- Pest control chemicals must be kept in their original container and used and stored in accordance with the manufacturer's instructions.
- Greyhounds must be removed from any areas where and while noxious pest control chemicals are being used.

## Exercise, socialisation and enrichment

Greyhounds are in the main social animals. It is very important that all greyhounds receive exercise socialisation and enrichment opportunities which contribute to their quality of life. This is true regardless of whether the greyhound is a puppy, in racing, being spelled, retired or awaiting re-homing.

This Review heard theories from a number of greyhound trainers that racing greyhounds required minimal out of race exercise, kennelling in quiet settings, and in low light. This view does not take into account the mental stimulation that a greyhound requires for high quality of life. It is noted that this view is not held by all trainers, with some indicating that they regularly took their racing greyhounds to straight tracks for exercise. There is a straight track at Angle Park for this express purpose.

Greyhound Racing SA include a section on exercise, socialisation and social enrichment in their Animal Welfare Policy 2021. On pages 41 and 42 the policy provides recommendations on the following cohorts of greyhounds:

- Age 0-4 weeks
- Age 4-8 weeks
- Age 8-16 weeks
- 16 weeks to commencement of training and racing
- Pregnant females
- Lactating females
- Spelling and breeding

The GRSA policy does not however seem to provide guidance regarding greyhounds in training and racing. It is important that trainers who have custody of greyhounds who are in racing kennels and in a training or racing phase, follow rules covering enrichment opportunities for greyhounds. Without such rules, this Review fears that a prevailing view that racing greyhounds require quiet conditions, will inhibit enrichment occurring.

Socialisation and enrichment are key areas of concern expressed primarily by interest groups external to the industry and former employees within the industry. This Review regards the issue as a critical element in regard to matters of social licence. It is important GRSA have a firm position on enrichment, and they must enforce it with rigour. To that end, enrichment policies should be enforceable directives, rather than guidelines.

Policies in some other Australian states detail requirements for enrichment of racing greyhounds. The GWIC Code of Practice states that greyhounds in training or racing must be provided with at least 30 minutes of free exercise per day, in the form of either free play outside the housing area or being walking on a lead and access to toys. The Code of Practice for the Keeping of Racing Greyhounds in Victoria has largely identical policy to the GRSA policy. The GWIC requirements referred to above, actually contemplate greyhounds in training and racing receiving enrichment and in the opinion of this Review is more in line with community expectations. The Review also believes that the community expectation on this aspect of animal welfare overrides afore-mentioned training considerations that greyhounds in training or racing must be kept in quietened conditions, and only removed from the training kennel, whilst it is cleaned.

### Recommendation

The existing GRSA exercise, socialisation and enrichment recommendations contained within the GRSA Animal Welfare Policy 2021 be augmented with the inclusion of the following requirements covering greyhounds in training and racing:

- Greyhounds in training or racing must be provided with at least 30 minutes of free exercise per day, in the form of either free play outside the housing area, or being walked on a lead, and provided access to toys.

### Recommendation

The existing GRSA exercise, socialisation and enrichment recommendations be given mandatory status and non-compliance should constitute a disciplinary offence.

The Review understands that this requirement will mean substantial change for many current trainers and can be seen as problematic for trainers with large numbers of greyhounds having to provide additional enrichment opportunities to this population. This is considered secondary however to the overall welfare of greyhounds and these changes are considered to be vital to the ongoing viability of the sport and social licence.

## Housing and enrichment conditions for retired and non-racing greyhounds

Due to a number of current environmental factors, GAP is having challenges in achieving its stated goal of re-homing all eligible greyhounds. These factors, which are explained elsewhere in this report, have resulted in GAP having to take prolonged custody of greyhounds awaiting both fostering and re-homing.

Greyhounds in this circumstance are currently housed in the following ways:

- Kept by trainers awaiting instructions from GAP or private re-homing.
- Kept by GAP at kennel facilities leased by GAP.

At the time of writing of this report GAP had 186 greyhounds awaiting foster care and re-homing. These dogs were kept in the above-described settings.

This Review visited GAP greyhounds at both. At a facility leased by GAP, approximately 30 greyhounds were being kept in a kennelling shed which was dark with a radio playing. The individual kennels were the size of kennels used for racing greyhounds, being the minimum space requirement of 2.4 metres squared. It was explained that these greyhounds were removed at least once a day and placed into a slightly larger outdoor kennel while their primary kennels were cleaned, after which each greyhound was returned to its kennel. It would appear that very little, if any, enrichment opportunities were being provided. The Review was told that this was done to “quieten” the animal prior to beginning its re-homing or fostering. This is contrary to GRSA policy which provides a retirement guide as follows:

### Preparation (week 1-4)

- Feeding regime must be adjusted to increase weight.
- Exercise regime must be slowly decreased.
- Transitioned to housing of at least 15 square metres.

### Preparation (week 5-6) After spelling, greyhounds should be moved to outdoor housing or to within a home

- Walked for 20 minutes per day in public, muzzled and on lead at all times.
- Acclimatised with various environments such as dog parks, visiting busy shopping strips.
- Socialising with other suitable domestic dogs (not greyhounds).
- Exposed daily to different surfaces.
- Exposed daily to people in non-training or racing settings.
- Provided with daily periods of isolation from other greyhounds and humans, starting with 5 minutes and gradually increasing to three hours duration.
- GRSA recommend that greyhounds are housed in a family environment such as a backyard.

### Preparation (week 7 – onwards)

- Walked for 20 minutes per day in public, muzzled and on lead at all times.
- Socialising with other suitable domestic dogs (not greyhounds).

The greyhounds observed were not being kept in circumstances that align with the above GRSA policy. This is particularly important as greyhounds could spend months in these settings given the current GAP backlog. Not providing the necessary exercise, enrichment and socialisation opportunities also serves to make the greyhound less likely to quickly adapt to an adopted home. These greyhounds were also kept in what appeared to be a racing kennel environment contrary to the housing requirements of at least 15 square metres.



This Review also identified that a number of trainers have retired racing greyhounds that have remained in racing kennels for a number of years.

In New South Wales, greyhounds awaiting adoption are kept at two specific facilities owned by Greyhound Racing New South Wales in rural locations. These facilities specifically provide holding pens for GAP greyhounds that have both indoor and outdoor components. These kennels are of a size similar to that provided to spelling greyhounds. There are also specialist facilities available such as hydrotherapy. Victoria has a similar stand-alone facility.

An inspection of trainer owned facilities housing GAP greyhounds awaiting re-homing or foster care in South Australia was conducted. All dogs appeared in healthy condition physically, although a welfare inspector did inform the team that they have had to remind one trainer about the cleanliness of their GAP greyhounds. At one facility a small number of retired greyhounds were sighted being kept separately from racing greyhounds and reportedly provided with regular free exercise. At a second site GAP greyhounds were being kept in the same facility as racing greyhounds which should be discouraged. Kennel facilities at either location did not meet GRSA space requirements of 15 metres squared.

This Review believes the kennelling standards in South Australia covering GAP greyhounds awaiting fostering or re-homing as well as racing greyhounds retired as pets are well outside the standards the community would expect, and urgent changes are needed to remedy this issue. GRSA need to ensure that the socialisation and enrichment requirements in their own welfare policy are adhered to for greyhounds in their effective custody or control.

Greyhound kennel sizes for retired greyhounds retained by participants and non-racing greyhounds awaiting re-homing or foster care should be enforced as per the GRSA Animal Welfare Policy (retirement guide). That is, at a minimum, housing space of not less than 15 metres squared and include access to indoor and outdoor environments.

Further GRSA should urgently look to acquire a facility for this purpose, as has happened in other states. This will ensure standards can be maintained and provide a place where consistent care and enrichment activities can occur. It is understood that GRSA recently purchased a parcel of land at [redacted] and are considering its use for this purpose.

### Recommendation

GRSA urgently enforce its own Animal Welfare Policy 2021 in respect of:

- greyhounds awaiting foster placement or re-homing;
- retired greyhounds retained by participants; and
- spelling greyhounds.

### Recommendation

GRSA acquire a stand-alone facility to house greyhounds under their care and provide care for GAP greyhounds in line with their own policies.

### Recommendation

Standards enforced by GRSA under its Animal Welfare Policy be upgraded from recommendations to mandatory requirements. Failure to adhere to these requirements should result in disciplinary action being taken.

## Artificial insemination

The current GRSA animal welfare policy does not cover the current industry practice of artificial insemination (AI). There are two means of AI currently in use in South Australia. They are firstly surgical insemination which involves surgically impregnating greyhounds with frozen thawed semen involving a laparotomy. This is seen as having disadvantages such as:

- The requirement of hospitalisation and general anaesthesia
- It is an invasive surgical procedure with increased patient morbidity
- Unnecessary pain and discomfort associated with laparotomy
- Consecutive surgical inseminations are not possible without multiple anaesthetic procedures
- Ethical concerns

The second method is Transcervical artificial insemination (TCI), which is an alternative method of insemination in the greyhound which does not involve surgery.

The Australian Veterinary Association (AVA) considered the efficacy of the two methods in 2020 and published the following information which is quoted at length given is clarity:

*Australian (Mason et al.) and New Zealand (Hollinshead et al.) reports have illustrated that the fertility of TCI is the same as, or better than, surgical AI in the dog, especially when using frozen-thawed semen.*

*In the study by Hollinshead et al., only seven of 1103 (<0.6%) intrauterine inseminations were not possible via TCI. When performed by trained operators, TCI is usually completed within 10 min, without the risks associated with anaesthesia and surgery, and is typically performed with no need for sedation.*

*The advantages of TCI compared to SAI include:*

- *No requirement for hospitalisation or general anaesthesia*
- *Eliminates the risks associated with anaesthesia and surgery*
- *It is a safe, nonpainful procedure when performed by trained operators*
- *Results in the same or improved conception rates when compared with surgical AI using frozen-thawed semen*
- *Can be completed within 10 minutes by trained operators*
- *Decreased patient morbidity*

*The disadvantages of TCI include*

- *Expertise and training of operators is required*
- *Rigid endoscopic equipment is needed.*

In considering the issues in this publication the AVA concluded and published the following policy:

### Policy

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

The *Animal Welfare Act 1985 (SA)* is silent on this issue. The RSPCA SA however have recommended that the practice be banned in their submission to this Review. Greyhound Racing SA considered the issue at their board meeting on 3 February 2022. At this time a decision was made that for reasons of consistency they would await a decision from Greyhounds Australasia as to the national policy position. Accordingly, AI is still practised in South Australia. Anecdotally the Review has been informed that at one veterinary practice in South Australia, the ratio of surgical AI versus TCI is 90/10.

The policy position of the AVA to not use surgical AI is in line with broader community expectations and independent community submissions received by this Review. Clearly it is in the welfare interest of the greyhound to discontinue surgical AI, especially given the identified disadvantages. Community concerns about this practice are not new and are well founded. A decision to ban Surgical AI by GRSA is essential as it is more consistent with their four-pillar value of 'animal care' and is in line with both the AVA policy and community expectations.

### Recommendation

Greyhound Racing SA immediately ban the use of Surgical Artificial Insemination in the South Australian Greyhound Industry. Any participant who knowingly utilises this method of breeding either directly or indirectly should be the subject of a disciplinary offence.

## Prohibited Substance Inquiries

Presenting a greyhound ‘not free’ of a prohibited substance is a breach of GAR Rule 141 and deemed a Serious Offence under Local Rules. It is therefore heard and determined by the Integrity Hearings Panel since its formation in 2019. Prior to that, such matters were determined by Stewards. Prohibited substance determinations are published on the GRSA website under “Integrity Hearings”.

This Review received many submissions from members of the public and animal welfare organisations expressing their concern regarding the penalty outcomes and approach taken by GRSA Stewards and the Integrity Hearings Panel in prohibited substance matters.

The Review examined the penalties imposed and observed that matters generally result in a suspension period between six weeks and three months which is suspended for 12 months, a fine of about \$500 and an order that prize money is to be repaid.

It is typical for prohibited substance inquiries to involve explanations from the trainer as to how the drug came to be found in the greyhound’s system and this explanation is usually unchallenged by the Stewards and accepted by the IHP. Some examples include:

- Medicine ingested by a greyhound by unknown means that was being used to treat another greyhound
- Consumption of contaminated food
- Transference of the substance through trainer’s personal medication.

This Review observed there does not appear to be any findings by the IHP or the Stewards as to the implausibility of the explanation proffered or efforts being taken to introduce evidence to the contrary. This is demonstrated by the case study below, which is based on decisions published on the GRSA website.

## Case Study

On 1 March 2019, after placing 1st in a 400m race at Gawler, greyhound Dynamic Lee, trained by Kathy Johnstone, tested positive for Tenoxicam. On 15 April 2019, Johnstone was unable to produce treatment records for the greyhound Dynamic Lee as required under the rules of racing. Johnstone was charged with breaching GA Rule 83(2) in that Dynamic Lee was not presented free of a prohibited substance and also for breaching GA Rule 84A(1), by being unable to provide treatment records for Dynamic Lee during the kennel inspection.

On 17 October 2019, the IHP conducted a hearing for this matter, noting the substance is categorised as a non-steroidal anti-inflammatory substance. Ms Johnstone gave evidence that she had no knowledge of how the substance came to be present in Dynamic Lee. In determining penalty, the IHP took into account Johnstone’s “unblemished record to date, the co-operation, courtesy and candour shown through this enquiry process” and imposed a fine of \$150 in relation to the failure to produce the treatment record, and a fine of \$3,500 and 6 month suspension for the prohibited substance offence. Ms Johnstone was required to serve 3 months of the 6 month suspension, with the remaining 3 months to be suspended for a period of 24 months (to be activated if any further breaches were committed).

This Review observes that Johnston received credit for her “candour” even though she had no explanation of how the substance came to be present and was unable to produce her treatment records. It is not clear to the Review how this behaviour represents candour. Ms Johnstone appealed this outcome to the Racing Appeals Tribunal (RAT) who upheld the period of suspension but reduced the fine to \$2000 (9 December 2019). The suspension was to commence from 17 December 2019.

On appeal to the RAT, President Tim Anderson QC remarked in relation to the offence of failing to produce the treatment record:

*In relation to the other charge under Rule 84A(1), Ms Johnstone could not produce her treatments record book when asked for it and offered no explanation for its absence. This in itself is a serious offence and by itself would normally have resulted in a much higher penalty than the \$150 imposed.*

*It clearly was regarded in connection with the more severe penalty imposed for the breach of Rule 83(2). The book was finally produced at the hearing of the matter some six months later, but I was informed that it was not inspected at that time by the Stewards because it was regarded as too remote from the time in question.*

On 8 October 2021, approximately 22 months after the suspension imposed by the Racing Appeals Tribunal commenced and within the 24 month “non re-offend” period, greyhound Sandave Vision, trained by Ms Johnstone, tested positive to morphine and codeine. In determining this matter, the IHP outlined Ms Johnstone’s explanation that she sourced bread from local bakers to feed her dogs and firmly believed that some of the bread contained seeds that precipitated the substances that were identified. The IHP noted that the Stewards accepted that explanation.

The IHP further noted Ms Johnstone is a well-known and highly respected participant within SA greyhound racing who has made a significant contribution to the sport over a period of some 50 years. The IHP referred to the suspended suspension, and noted the offence breached that period, and Ms Johnstone would therefore be required to serve another three months suspension. The IHP took into account Ms Johnstone’s candid dealings with the Stewards and the IHP, early guilty plea and the “inadvertent provision of bread” and ordered that the three months be served concurrently with the new penalty of three months, commencing from 3rd August 2022. Ms Johnstone appealed this decision to the RAT. The appeal was dismissed.

Greyhound Racing SA introduced penalty guidelines in February 2023 which effectively mirror GWIC’s Penalty Guidelines. Their stated purpose is “to provide advice to participants about the penalties that may be imposed where an offence under certain rules of racing is proven.” There have only been three published determinations which post-date the penalty guidelines being introduced in February 2023, however on Review of those determinations, it is not clear whether the IHP is applying the penalty guidelines.

For example, an inquiry concerning an inquiry concerning a trainer was determined on 14 March 2023 for an offence of “presented a greyhound not free of a prohibited substance namely Diclofenac and Atropine” at Angle Park on 10 October 2022. The IHP suspended the trainer for 3 months, fully suspended for a period of 12 months and imposed a fine of \$500. Looking at the GRSA Guidelines, however, diclofenac is a Category 3 prohibited substance which should attract a penalty of 2-month suspension with a reduction of 25% for a guilty plea. In addition, a trainer who has been registered for more than 10 years with no breaches of the rules relating to prohibited substances will receive a fine for a first time Category 3 offence.

The determination does not state whether the trainer pleaded guilty, or his disciplinary history or how long he has been a trainer for, so it is not possible to assess whether the guidelines were followed.

On 6 February 2023, the IHP determined a prohibited substance matter of a trainer who presented a greyhound not free of a prohibited substance, namely caffeine. The IHP suspended the trainer for three months, from 3 November 2022, fully suspended for 12 months and imposed a fine of \$500.

Under the penalty guidelines, caffeine is a category 2 prohibited substance. A first offence should result in a minimum four month suspension, however a 25% reduction will be applied to the minimum starting point for an early guilty plea and a trainer who has been registered for more than 10 years with no breaches of rules relating to prohibited substances is eligible for a further 25% discount for a first offence after entering an early guilty plea. If the penalty guidelines were applied correctly, the trainer should not have received a suspended suspension, even assuming it was his first offence and he pleaded guilty.

The Review also notes, by way of contrast, a Stewards Inquiry involving a trainer determined 4 January 2023 found that the trainer had abused a member of a greyhound racing club and suspended the trainer for 73 days from 24 October 2022 (the date the suspension was imposed).

The determination notice does not explain the circumstances of the offence or whether the trainer pleaded guilty, or why it was deemed so serious as to suspend the trainer pending disciplinary action, however it provides an example of how penalty outcomes involving conduct towards Stewards or other industry members tend to be more severe compared to conduct towards greyhounds.

The Review acknowledges that the case study above involving Kathy Johnstone pre-dates the Penalty Guidelines adopted by GRSA in February 2023, however it is useful to consider the penalties which would apply under those Guidelines. A first offence for a Category 2 substance would attract a four-month suspension, with 25% reduction for early guilty plea. However, as Ms Johnstone had a previous offence for a prohibited substance, the guidelines would indicate a suspension period of between six-eight months.



This Review considered a number of published IHP determinations for prohibited substances matters and compared these against other jurisdictions and found the outcomes published in 2022 onwards are wholly inadequate in their content in that:

- The determinations do not explain how the sample was taken i.e. urine or blood or hair sample.
- The determinations do not outline the degree of concentration of the prohibited substance.
- The determinations do not explain what effect the nature of the prohibited substance is known to have on the performance of the greyhound, by reference to the penalty guidelines (for example a pharmacological effect that is a stimulant or depressant, or a pharmacological effect that is a therapeutic painkiller, anaesthetic etc).
- The determinations do not refer to the penalty guidelines to outline what Category the prohibited substance in question falls into for the purposes of penalty (Category 1, 2 or 3).
- The determination does not state whether the offence was a first offence for the trainer, or whether the trainer pleaded guilty, which would impact penalty.
- The determination does not state what placing the greyhound came in the race and the relevant prize money or any other context about the greyhound's racing performance (other than in the reference to prize money being repaid and distributed to other participants).
- The determination does not outline how the Panel arrived at their determination as to penalty and in particular, does not address factors such as:
  - Whether the registered person pleaded guilty
  - Their registration history
  - Their disciplinary history
  - Personal circumstances and whether they were remorseful
  - Explanation for the offending
  - Need for person and general deterrence
  - Whether the registered person profited from the conduct in terms of betting winnings.

By way of example, GRSA published the determination of Inquiry regarding a trainer on 29 November 2022 which involved six charges of not presenting greyhounds free from of a prohibited substance, namely caffeine. The IHP imposed a three-month suspension effective from 22 August 2022 (the date the

suspension was imposed) and stated it would publish its reasons in due course. The reasons have not since been published. The outcome does not state the names of the greyhounds involved or whether the positive samples were taken on the same day or separate days, so it is not possible to ascertain any information regarding this matter. It would appear to be a serious matter if it involved 6 greyhounds all testing positive to caffeine. This lack of transparency is not helping public perceptions of the greyhound racing industry.

It does not appear the IHP is being held to account by the IWC with respect to whether the penalty guidelines are applied and as the penalty outcomes generally do not involve immediate suspensions, such matters are not being tested on appeal to the Racing Appeals Tribunal. [Redacted].

It appears that the IHP members and Stewards do not receive any formal training in relation to the impact that different types of prohibited substances may have on the performance of a greyhound and why a trainer might be motivated to dope their greyhound (such as in the context of race fixing). The Review found that other jurisdictions have valuable information to share in this regard which would enhance the knowledge of the IHP members and may provide them with more confidence to challenge the plausibility of some of the explanations proffered. This continued learning is vital to upholding the integrity of the sport.

It must also be borne in mind that even if a participant is found guilty of a prohibited substance offence, and ordered to return prize money, this does not extend to any betting winnings that the trainer (or their connections) may have won from the race in question. This reinforces the need for penalties to have a deterrent effect, namely immediate suspensions rather than suspended suspensions, otherwise participants who are tempted to gain an edge by the use of prohibited substances or engage in race fixing, may well calculate the cost of suspended suspension and find they come out on top.

The Review also noted that the names of the Stewards and IHP Panel members are not included in the published determinations which is at odds with any disciplinary determination and contrary to the approach taken by other jurisdictions. This applies also to Stewards outcomes which the Review considered in welfare related matters that had not been published.

For transparency and integrity purposes, it is crucial that the person(s) who heard and determined the inquiry, are named on the decision.

## Recommendation

The IHP/Stewards must ensure that prohibited substance Inquiry outcomes are published with details of and having regard to:

- The name of the Steward or IHP member(s) who determined the matter
- The names of the greyhound(s) involved and their placing
- How the sample or swab was taken (urine, blood or hair sample) and the relevant concentration
- The category of substance by reference to the penalty guidelines
- what effect the nature of the prohibited substance is known to have on the performance of the greyhound
- Whether the registered person pleaded guilty or was found guilty
- The person's disciplinary history and registration history
- Circumstances of the offence
- Whether the registered person profited from the conduct in terms of betting winnings
- The degree of remorse
- The need for personal and general deterrence.
- The penalty guidelines and the basis for any departure from the guidelines (if applicable)

## Recommendation

Once the potential conflict between IWC Chair and IHP Chair is addressed, the IWC should regularly review penalty outcomes to ensure they align to penalty guidelines and serve as an adequate deterrent to industry.

## Rehoming and euthanasia obligations

Table 3 on page 112 outlines the obligations of participants in relation to rehoming and euthanasia of greyhounds (whether raced or unraced). The Review noted that GRSA was unable to provide a factsheet or policy which would clearly outline for participants their obligations in relation to rehoming and euthanasia compared to, for example, that which is available for participants in Queensland or New Zealand. This table was therefore prepared based on the Review's analysis of the Local Rules and GAR, which was not a simple process.

Given the importance of participants understanding the rules with respect to rehoming and euthanising greyhounds, the Review considers it is critical that GRSA formalise their policy position and develop a helpful factsheet that is available and distributed to participants.

In addition, the Review notes a potential loophole with respect to retired greyhounds in the care, custody or control of a participant. Local Rule 130(1AA)(ii) states:

*Where a registered person has care, custody or control of a retired greyhound, and that person -*

*(i) intends to transfer ownership from that registered person to any other person; or,*

*(ii) euthanise that greyhound for any reason (other than in an emergency and in the best interests of the greyhound, the proof of which lies with the person),*

*the registered person must notify the Controlling Body no less than 3 business days before the intended transfer or euthanasia procedure, in addition to any other requirement to notify the Controlling Body under the Rules.*

GRSA advised this Rule is intended to allow GRSA to intervene with respect to a retired greyhound to make orders that will prevent euthanasia. However, under Rule 130A, GRSA's powers to intervene to prevent euthanasia only apply to a "Relevant Greyhound" which is defined as a greyhound which is unraced (and will not be raced) or is to be retired from greyhound racing and is unable to be rehomed to a third party, despite best endeavours of the registered person.

The effect is that a registered person could retire a greyhound to themselves as a pet, and then have it euthanised and GRSA could not intervene under LR 130A. The Review recommends this loophole is addressed urgently.

The Review also queries why, even assuming GRSA's powers to intervene did apply to Local Rule 130(1AA) (ii), the participant must notify only 3 days before the euthanasia procedure. It would seem that a 3 day window is insufficient for GAP staff or the welfare officers to intervene, especially given the waiting list of greyhounds and the workload that generates.

### **Recommendation**

GRSA to develop a Rehoming and Euthanasia Obligations Factsheet which clearly outlines participants' obligations consistent with the GAR and Local Rules that is easily accessible and distributed to participants.

### **Recommendation**

GRSA to urgently review Local Rule 130 to address a potential loophole for greyhounds retired to registered persons to be euthanised.



# Greyhounds as Pets (GAP)

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The Greyhounds as Pets Program or GAP as it is known, first existed in its current form in the United States as Greyhound Pets of America. It commenced in South Australia in 1997. The GAP program is dedicated to finding homes for both retired and non-racing greyhounds. It also has a function to educate the public about the gentle nature of the breed. There has been at least one university study that found greyhounds to be one of the least aggressive dog breeds (University of Pennsylvania; 2008).

In their submission to this Review GRSA stated that greyhounds being adopted are not regarded as ‘rescues’ but rather are retired athletes, re-homed from the industry by the industry. This is one view. Another was expressed by some who spoke with the Review team and stated that they believe these are rescue greyhounds. The truth is probably a combination of the two views. Many greyhounds are retired from racing and then are re-homed as retired athletes. Others are greyhounds that are never raced, or are injured whilst racing, for whom the most likely option other than re-homing would be euthanasia.

In 2021/22 GAP re-homed 489 greyhounds. In 2022/23 it re-homed 526. A further 241 greyhounds were re-homed in 2022/23 by other adoption methods described in this report. According to the GRSA submission to this Review, approximately \$4,000 per greyhound is spent on re-homing each animal, and in 2022 GRSA expended \$2.04 million dollars on GAP and related re-homing initiatives.

If a greyhound is deemed to be a non-racing or retired greyhound, under GRSA Policy the connections of that greyhound are required to re-home the animal. That can be done by the greyhound becoming a pet of the owner or trainer or re-homed by the trainer in some manner. The GRSA policy intention is that a greyhound cannot be euthanised in this circumstance unless recommended by a veterinary surgeon on medical grounds relating to the welfare of the animal. Greyhound Racing SA provide subsidies in some cases to GAP greyhounds being kept at trainers’ premises awaiting adoption. Some owners/trainers run their own re-homing program including using online trading websites. This Review received information regarding a greyhound which was re-homed by a prominent trainer using such a website to a person clearly incapable of caring for it. The greyhound in this situation was found to be emaciated and in poor health and had to be rescued from its environment by a good Samaritan. Trading greyhounds on trading websites carries risk if due diligence is not done properly.

Some greyhounds are also re-homed by private re-homing organisations although these are fewer in number than in the eastern states. These organisations are motivated by a commitment to the welfare of greyhounds and are not usually well funded.

When a non-racing or retired racing greyhound cannot be re-homed successfully by its connections, greyhounds are taken over by the GAP program. Greyhounds As Pets conduct an assessment as to suitability for re-homing. This assessment involves exposing the greyhound to external stimuli, typically a small white dog and assessing its response. Notice will also be taken of the greyhound’s general demeanour and affect. If the greyhound’s connections have worked on socialising the greyhound beforehand, it is often much easier for the greyhound to pass this assessment. If the greyhound passes this test, it is deemed suitable for re-homing and is awarded a green collar. If it fails this test, it will be provided to a foster carer to assist in addressing the greyhound’s suitability.

GAP have access to 15 long term foster carers, and a broader group totalling 29 carers who volunteer their time to socialise greyhounds they receive. These greyhounds can be with a foster carer anywhere between a few weeks to a few months. Currently foster carers receive \$25 dollars a week from GRSA to cover food bills. Carers can also access the vet facilities at Angle Park if required. At the current time \$25 a week is insufficient to cover a greyhound's food requirements and other expenses connected with grooming and enrichment. A carer visited by the Review team had the "love of the greyhound" as their main motivation and was complimentary of both a particular GAP staff member and recent changes that had been made there.

A foster carer will typically seek to socialise a greyhound in a home setting, mixing with people and other animals. According to the experience of the foster carer not all greyhounds are 'couch potatoes' and require individual programs depending on their personality types. A carer can form a view as to what type of home might suit a greyhound such as a quiet home or a family setting including children. This recommendation is then provided to GAP. In some cases, foster carers might interview a prospective adopter themselves to assess suitability to take a particular greyhound.

Greyhounds are also fostered in other setting such as the "Greyhounds in Prisons Program" where kennel facilities are established in a prison setting and foster greyhounds are cared for and socialised by selected prisoners. This has proven to be a successful model and it is understood that there are plans to expand this model to other corrections facilities.

Greyhounds with certain personality types have proven beneficial as companion dogs for first responders and recently the South Australia Police Association has entered into arrangements to provide greyhounds to police officers dealing with mental health challenges.

Because of the low number of foster carers, combined with an increasing number of greyhounds awaiting adoption, larger numbers of greyhounds are being kept by GAP in holding kennels leased by GRSA. Elsewhere in this report concerns are detailed regarding the conditions these greyhounds are being kept in. Recommendations are made concerning those conditions.

There are a range of factors which are impacting the ability of GAP to re-home greyhounds, despite their success in re-homing higher numbers of greyhounds in recent years. These factors are open to debate and the opinions of individuals but are believed to include a post-Covid-19 glut of pets in homes, restrictions on pets in rental premises and the current cost of living. It

is also possible that over a number of years, the number of homes that are open to adopting a greyhound may have become saturated. In addition to these environmental factors, GAP South Australia also rehome a number of greyhounds that were born interstate and were transferred to South Australia. Last year GAP rehomed 225 greyhounds that were bred interstate. This accounted for almost half of the re-homed greyhounds that year. This is because greyhound racing in South Australia is a destination for interstate greyhounds who are not fast enough to race in other states. With these various factors in play, it is more important than ever that GAP is properly resourced to advertise to, and recruit, potential adopters.

Staff turnover within the GAP team has continued to be an issue for GRSA. This Review is aware of the experiences of several former GAP staff that have raised concerns regarding various issues, a number of which are outside the scope of this inquiry. Concerns have been noted, however, with the danger of setting targets for the GAP team to achieve. Concerns were that meeting these targets leads to shortcuts being made in assessing suitability of greyhounds for adoptions. This in turn means that greyhounds are returned from their adopted homes and impact on GAP targets. In the current year, 25 greyhounds have been returned to GAP from adopted homes due to a range of factors, including the behaviour and unsuitability of the greyhound.

The target set for GAP by GRSA in 2023/24 is 575 greyhounds. This is an increase of 50 on the 2022/23 number. This figure appears to be based on how many greyhounds are expected to become available for re-homing. It would be preferable if the logic were reversed. The number of greyhounds bred each year should be informed by the likelihood of them being re-homed. In any event GAP should not be unduly pressured by having a re-homing target set each year and the quality of re-homing efforts should not be risked.

Veterinary submissions viewed by this Review also raised the issue of euthanasia in this context. There was a view expressed that setting a target for re-homed greyhounds was dangerous because not all greyhounds are suitable for re-homing and there needs to be an acceptance that euthanasia is a humane welfare option rather than risk negative welfare outcomes from a greyhound wrongly re-homed. Currently euthanasia does occur when all efforts to re-home a greyhound fails usually due to behavioural issues. Last financial year one GAP greyhound was euthanised.

Euthanasia rates of retired or un-raced greyhounds outside of the GAP program, however, are impossible to accurately assess. There is little capability within GRSA to determine this figure outside of the receipt

of a notification form participants are required to send them when a greyhound is euthanised. This is because GRSA lack a system sufficient for tracking greyhounds.

In their submission to this Review, GRSA made a recommendation for them to acquire the eTrac Greyhound Traceability System (eTrac). That recommendation is supported by this Review. The eTrac system has been developed in NSW and is currently in use in that jurisdiction. Prior to obtaining eTrac however, GRSA needs to conduct a transitioned audit to determine where all greyhounds are placed or housed. This will ensure that a full reconciliation is done before data is entered in the new system. A transition audit involves tracking each dog to its current home. This can be done in person or via telephone/video conferencing if necessary. This will give GRSA an accurate picture of how many retired and non-raced greyhounds are still alive and where they are. It is important for transparency reasons that the result of this audit be made public.

### **Recommendation**

GRSA must ensure their investment in the GAP program marketing is sufficient given the challenges with re-homing greyhounds in the current climate.

### **Recommendation**

That GRSA cease setting GAP annual targets for re-homing greyhounds.

### **Recommendation**

That GAP conduct a transition audit of retired and non-raced greyhounds ahead of acquiring eTrac and publish the results of that audit.

### **Recommendation**

Greyhound Racing SA should consider placing a cap on allowing interstate bred greyhounds into the State unless there is a plan in place to re-home that greyhound in the home state.

# Culture

The Review was asked to assess culture within the industry. This was primarily achieved using an industry survey combined with an assessment based on interviews conducted.

Within the timeframes of this Review a full and complete culture analysis was not possible, however the mechanisms used during the Review have provided some insights on cultural traits within the industry.

This section of the report also details specific concerns expressed by industry participants, along with any recommendations arising from those concerns. See page 113 for a summary of survey data.

To assist this component of the terms of reference a survey tool was designed with the assistance of the Office of Recreation, Sport and Racing. The Review received 372 responses from GRSA licensed greyhound owners, breeders, trainers and handlers.

The survey was responded to predominantly by participants who had relatively less time in the industry. This was despite the majority of participants being aged over 60 years.

## Prizemoney

The predominant issue of concern raised by participants was the level of prizemoney available in South Australia when compared with other states. In South Australia prizemoney is the lowest of the mainland Australian states. For example, GRSA advise the prizemoney available for a city Grade 5 race in 2022 was \$4,760 compared with Western Australia at \$7,250.

This is because the amount of Point of Consumption Tax (POCT) on gambling retained by the industry in South Australia is also the lowest in the country.

The prizemoney available to participants was also raised with the Review team by participants on many occasions. Efforts have been made by GRSA to increase prizemoney where possible, and the level of prizemoney would seem consistent with their share of retained revenue. In the GRSA Annual Report 2021/22, net TAB revenue was \$3.659M, compared with a total national and state turnover of \$89.828M. That equates to an estimated retained revenue percentage of 4.07%.

As a result of this Review, substantial improvement will need to be made to the conditions of training facilities around the state as well as at GRSA managed GAP facilities. The impost or cost of this will be expensive and mostly borne by industry participants. Considering the outcomes of this Review, the government could contemplate lifting the retained share of POCT, to allow GRSA to assist this industry wide, welfare reform process.

### Recommendation

Government conduct analysis to determine the appropriateness of allowing GRSA to retain an increased share of Point of Consumption Tax (POCT) to assist funding improved welfare conditions in the industry.

## Provided by GRSA - Table of comparison for POCT rates (estimated at 30th June 2023)

	SA	NSW	VIC	QLD	WA	TAS
POCT Rate	15%	15%	10%**	20%	15%	15%
Net % retained by codes	20%*	33%	35%**	80%	30%	80%
Est retained share POCT Revenue FY23+	\$9.2	\$135.1	\$85.0	\$165.5	\$27.5	\$6.8



## Other challenges

The industry survey also highlighted other challenges, which were in descending order, re-homing, GAP, drug cheats, public perception of the industry, welfare, integrity and communication through the industry. Some of these are expanded on below.

### Rehoming

This Review agrees that greyhound re-homing and the sustainability of GAP are legitimate concerns and are dealt with in this report. Similarly, this Review is making recommendations to improve drug detection in and out of competition. This is also the case for integrity systems within the industry.

### Welfare

Given the level of welfare concerns highlighted in this Review and the amount of angst within the community arising from recently publicised animal welfare issues, it could be expected that welfare matters may have rated more highly in industry concerns. When aggregated with concerns about public perception and industry communication, it could lead to the view that the industry is somewhat insular in its culture. This is understandable to some degree, given the amount of negative publicity the industry has received over recent years. Many participants have expressed the view that such public criticism is unwarranted and that it does not fairly represent them. These participants view recently publicised welfare issues as relating to a small minority of people, bringing down the reputation of the majority of participants. This results in a defensive outlook when participants discuss their industry.

Another factor that supports the greyhound industry culture being somewhat insular is the issue of greyhound kennelling standards. All participants who managed kennels that were visited during this Review had a clear affection for their greyhounds. Their predominant view was that their greyhounds were kept in good conditions, and that they followed guidance from GRSA regarding their kennelling standards. Indeed, greyhounds sighted in this Review almost all exhibited excellent physical health. This Review is certain that these participants have the best interests of the greyhounds in mind and that they believe they are treating them well.

With regard to the kennel standards however, whilst facilities may be in line with current GRSA policy, most were not in line with what the broader community might expect. The community expectation is that greyhounds are kept in sufficiently spacious surrounds

to regularly exercise free movement, and that they are provided with opportunities for free running and enrichment experiences. The fact that a significant gap exists between what the industry participants believe are good welfare practices and what the community expects, is reflective of an insular culture that has not evolved with community expectations regarding animal care. More outside influence in setting kennelling and exercise standards would assist in reducing this gap and provide better welfare outcomes for greyhounds. Recommendations to this effect are made in this report.

When surveyed directly on the issue on culture, participants gave quantitative responses to the following cultural descriptors.

Based on these survey results the ratio of participants with a positive outlook on the industry compared to negative was 3:2.

Industry participants were also asked about their sentiment towards governance in the industry. The results are detailed below.

It is a pleasing result for the industry that the ratio of negative sentiment to positive or neutral responses was 1:2:8. This is pleasing because the GRSA has a dual role of both governance and regulation. This positive outlook is also reflected by participant views regarding industry sustainability, with 69% of respondents believing the industry is currently either sustainable or very sustainable. See page 113 for a summary of survey data.

With the proviso that the Review timeframe did not allow for an extensive cultural analysis, the Review believes that the culture of the greyhound industry in South Australia can be described as positive but insular. What would improve the culture is more engagement between independent community representatives and participants, which would enable a dialogue designed to ensure that the industry participants can be more responsive to community views and standards on greyhound welfare and industry conditions as they evolve. Recommendations made in the governance section of this report are designed to assist in creating these opportunities.

# Oversight

In 2020, GRSA appeared before a government committee dealing with the Statutes Amendment (Animal Welfare Reforms) Bill 2020. In giving evidence before that committee GRSA undertook to improve its performance on a range of issues covering the governance of the industry. Based on the findings of this Review GRSA has not sufficiently delivered against this commitment. This raises the issues of independent oversight.

South Australia is one of only two Australian states that does not have independent oversight of its racing codes. Tasmania is currently implementing the results of a similar Review in that state which includes recommending oversight. This is reflective of a broader view that industries that provide both governance and regulation require the checks and balances provided by independent oversight.

Before the Government considers the various models of independent oversight however, there is an interim step that is necessary. This Review is persuaded by the RSPCA submission to this Review where at recommendation one they state:

***Unless the significant, entrenched animal welfare problems inherent to the greyhound racing industry can be recognized and effectively resolved, this industry should not be supported.***

Animal welfare issues identified in this Review need to be urgently improved before government can be better assured that the industry should continue in its current form. It is only if these reforms can be successfully undertaken that government should consider longer term oversight models.

It is therefore recommended in this Review that a reform period of two years be allocated, and that this reform be overseen by an independent inspector, with reporting functions to Government. Only if this Inspector is satisfied, after a period of two years that reforms have been satisfactorily achieved, would this Review recommend a longer-term continuance of the industry with an oversight model considered best practice at that time.

## Recommendation

Government to establish the role of an independent inspector for greyhound racing reform, to be known as the Greyhound Industry Reform Inspector, (GIRI) which should include the features, functions, and duties set out below.

- The GIRI should have unfettered access to GRSA systems and data to inform this work.
- The GIRI should be entirely independent of the industry and this Review.
- A greyhound racing reforms advisory group should be formed to provide professional advice to the GIRI regarding reform progress. The skill sets of this group should comprise:
  - Animal welfare expertise (independent of greyhound racing)
  - Gambling regulation expertise
  - Greyhound industry experience
  - Sports regulation experience
- The General Manager Integrity and Welfare at GRSA should have a dual reporting line to the GIRI. The reporting line to the GIRI is not to cover management of the welfare function, but to report on welfare matters to the GIRI.
- The GIRI should determine the frequency and mode of reporting he/she receives from GRSA as to reform progress.
- The GIRI should report on a regular basis to the Minister for Racing as to reform progress, and ultimately provide a final report after two years as to their level of satisfaction with the reform progress. If a decision is made to continue greyhound racing at that point, the GIRI should express a view as to the most appropriate oversight model going forward.

The two year reform period should commence from the time of the appointment of the GIRI.

# The social licence

The issue of greyhound racing having a social licence is important in the context of this report. The Ethics Centre defines social licence as “the acceptance granted to a company or organisation by the community. Further, social licence is made up of three components: legitimacy, credibility and trust”.

When examining these three elements, it should be done through a community lens. The community referred to here means ‘general community’. That is, the concept of social licence should not be considered through the lens of the industry itself, and not through the lens of people passionate on an issue to the point of activism, but rather, using a lens that provides a general view – such as that held by the majority who occupy the middle ground.

Greyhound racing, along with other racing codes, has been under pressure from community groups for some time, mostly regarding animal welfare practices and to a lesser extent, the perceived social ills of gambling. For the industry of greyhound racing, such groups generally believe that the activity should be banned. Conversely, the industry believes that it should continue in its current form, that it is not illegal, it provides broader benefits to the community, and provides a form of revenue to people - albeit mostly in the form of gambling revenue.

When social licence is brought into question it is generally because the activity begins to occupy a space between being a generally acceptable activity or an illegal one. In this space, people begin to have ethical questions about the continuance of an activity, and in some cases these ethical concerns reach a point where a practise is ceased, usually by a competent authority and / or government. In other cases, the activity being questioned successfully defends its position and the activity continues, often with modification. In either case that decision is ultimately made because of the view held by the community majority.

Greyhound racing is lawful and has been legitimately operating with community credibility for decades. If it did not have those features, it would have ceased operations years ago. In that sense it has a broader social licence. The issue of trust however is a different matter. Trust is a vital component of social licence and without it, credibility is eroded. Over recent years, largely due to the efforts of activism, publicly cited cases of animal cruelty have impinged upon community trust. This has occurred to the point where government feel that the majority of the community are questioning the legitimacy of the industry from an ethical standpoint. That has rightly prompted the South Australian Government to initiate this Review. Advice from this Review will further assist Government with its community conversations and better inform it as to its proper decision making.

This Review has found that serious issues exist with regard to animal welfare within the greyhound industry in South Australia. Primarily, there is a ‘gap’ between the greyhound welfare standards being practiced in the industry and community expectations of what contemporary good animal welfare looks like. If left untreated, this Review believes that this difference will only increase over time. This Review further believes that currently, this disharmony of views is so great, that urgent reform is required to meet broader community expectations around animal welfare. Without that reform being successful in reducing this variance, then government should consider ceasing the industry in its current form. The recommendations in this Review are designed with a mindfulness of this.

There will be a view from some as to whether the industry deserves an opportunity to reform given its previous assurances that 'all was well'. It is a sensible question. Ultimately, people have a right to practice a social or business activity provided it is legal and is not harmful to others, be they people or animals. People may disagree with their decisions to be involved in this activity, however that does not automatically mean that such an activity should be banned. Further, the industry does generate a substantial amount of money for government through its gambling activities. This money contributes to broader government services that benefit the community.

On the other hand, greyhound racing has evolved to be purely a gambling industry and with that comes the unavoidable and possibly insurmountable tension between animal welfare and the demands of the gambling industry.

The greyhound itself is a pure-bred sight hound breed that has a naturally bred tendency to chase in short bursts. If they can be provided with opportunities to run and chase safely, it seems on balance to be something that the majority of greyhounds enjoy.

On balance, if the industry can conduct itself in a manner consistent with community norms, then it should be able to do so with broader community support. The question is, can it do this? This Review sets out the test required to allow government to make that decision.



# Submissions

During this Review a total of 614 submissions were received from the following category of contributors:

- **Industry: 22**
- **Non industry: 10**
- **Individuals: 582**

Many of these submissions were extensive. They were given due analysis and many of the recommendations from these submissions were adopted by this Review.

The submission recommendations of three organisations have been specifically referenced below. The recommendations supported by this Review have been referenced. Other recommendations are either not supported or are made redundant by other recommendations made by this Review.

## Greyhound Racing SA Submission

The Review received a comprehensive submission from the GRSA. The submission provided a number of useful recommendations for reform and this Review agrees that a number of the reforms should be adopted as recommendations in this report. They are as follows:

### GRSA Recommendation 1 accepted

That GRSA work in partnership with Controlling Bodies to create a unified and standardised approach to licensing within the greyhound industry including defining the necessary education, training, and skill requirements for different roles held by licensees.

### GRSA Recommendation 3 accepted

To ensure the presence of an on-track vet at any licensed race that the *Authorised Betting Operations Act 2000 (SA)* be amended such that:

- section 36 of that Act makes it a mandatory condition of any licence authorising a racing club to conduct on-course totalisator betting in conjunction with a race meeting held by the Club only occur if a Veterinarian registered under the *Veterinary Practice Act 2003 (SA)* is present with a penalty to the controlling club and its officers in the event of a breach of the condition.
- section 36 of the Act makes it a mandatory condition of any licence that the racing club provide an annual report to the Minister for Racing in respect of its compliance with the condition set out above.

### GRSA Recommendation 4 accepted with changes

GRSA to work on developing a more collaborative relationship with the Dog and Cat Management Board to strengthen their partnership concerning the registration of greyhounds. This includes registrations for both as canines and breeding, with the goal of simplifying the greyhound registration and tracking process within the DACO database.

### GRSA Recommendation 5 accepted

Revise the Local Rules and Animal Welfare Policy of GRSA to explicitly state that all greyhounds, including those intended for breeding, must be registered with the Dog and Cat Management Board. This requirement applies to both new greyhound registrations and those approved for breeding purposes.

### GRSA Recommendation 8 accepted

GRSA continue to develop a complaint and intelligence management application to enable better tracking and sharing of information and intelligence across GRSA and other state Controlling Bodies.

### **GRSA Recommendation 9 accepted**

GRSA move from the *Know Tell Protect* initiative to a more independent and secure platform similar to Crime Stoppers, such as *Safe2Say*.

### **GRSA Recommendation 13 accepted**

GRSA should continue their good work with greyhounds in the community, by expanding the GAP SA foster program into other prisons, including Mount Gambier.

### **GRSA Recommendation 14 accepted**

GAP SA evolves and improves by exploring alternative fostering and adoption options, including collaboration with third-party (non-GAP SA) rehoming agencies that share a commitment to transparent and ethical animal rehoming practices.

### **GRSA Recommendation 15 accepted**

GRSA to work with Greyhounds Australasia, as facilitator with other Controlling Bodies, to create a unified and standardised approach to licensing within the greyhound industry. This should include defining necessary education, training, and skill requirements for different roles held by licensees.

### **GRSA Recommendation 16 accepted**

GRSA broaden its minimum penalty guidelines to encompass all prevalent and substantial rule violations within the Rules of Racing.

### **GRSA Recommendation 17 accepted**

GRSA implement the eTrac greyhound traceability system.

### **GRSA Recommendation 18 accepted**

GRSA assess and implement accredited training programs to assist stewards and racetrack curation staff to better perform their functions.

### **GRSA Recommendation 19 accepted**

Within its Integrity and Welfare Committee, GRSA should institute a recurring agenda item dedicated to Reviewing all significant racing injuries and on-track fatalities. This measure aims to detect any discernible patterns or factors that could be significant contributing factors to these injuries or fatalities.

### **GRSA Recommendation 20 accepted**

GRSA formulate a binding code of conduct and practice for the greyhound racing sector incorporated into the Local Rules. This code should provide industry-wide guidance on best practices concerning greyhound care, health, and welfare throughout the complete lifecycle of greyhounds.

It should be noted that a number of recommendations not accepted above are dealt with elsewhere in this report.

The Review also acknowledges and thanks the following industry organisations for their submissions to the review:

- Adelaide Greyhound Racing Club Inc
- Gawler Greyhound Racing Club Inc
- Murray Bridge Greyhound Club Inc
- Mount Gambier Greyhound Racing Club Inc
- Greyhound Owners Trainers & Breeders Association Coursing Club Inc
- Greyhound Clubs Australia
- Greyhounds Australasia

## **Non industry submissions**

This Review received submissions from non-industry groups and individuals. These submissions varied from simple emails to extensive submissions. This Review is grateful for, and would like to thank these people and organisations that took the time to contribute, and would like to particularly mention the following organisations that contributed significant submissions:

- Stop Dog Racing Australia
- RSPCA SA
- South Aussies for Animals
- Police Association of South Australia
- Greyt Greys Rescue Inc
- Greyhound Welfare Initiative
- Friends of the Hound
- Animal Justice Party
- Animals Australia
- Coalition for the Protection of Greyhounds

Non industry submissions raising animal welfare concerns within the greyhound industry were predominantly of the view that greyhound racing was cruel and should be banned, as it has been in many countries. Examples were cited of significant animal welfare breaches including injury and death of greyhounds. Almost all contributors also considered there to be no social licence for greyhound racing to continue. Many other issues common issues were raised including:

- Lack of independent oversight
- GRSA stated aims not consistent with animal welfare
- No birth to death traceability
- Insufficient transparency regarding publishing greyhound injuries and deaths
- Excessive breeding
- Setting minimum standards for socialisation
- Setting minimum standards for enrichment
- Prohibiting surgical artificial insemination
- Timely access to veterinary attention
- Stronger penalties for breaches of standards and regulations
- More comprehensive and independent inspections
- Compulsory welfare training for industry participants
- Prohibiting barking muzzles
- Impact on private sector of re-homing greyhounds
- Trial track injuries not being reported
- Poor culture within industry
- A culture of cruelty
- Irresponsible breeding
- Doping of greyhounds

The submission from the Police Association of South Australia was supportive of the continuation of the 'Greyhounds as Mates' initiative.

Many of the arguments made in these submissions were compelling and have been adopted as recommendations in this Review.

Of particular note were two submissions containing recommendations that this Review considered should be highlighted in this report. The report highlights which recommendations have been accepted by this Review.

## RSPCA Submission

The Review received a lengthy submission from the RSPCA. The submission made 24 recommendations for improvement of greyhound welfare. This report details below which of these recommendations are accepted and recommended by this Review.

### RSPCA Recommendation 1 accepted

Unless the significant, entrenched animal welfare problems inherent to the greyhound racing industry can be recognized and effectively resolved, this industry should not be supported.

### RSPCA Recommendation 3 accepted

Adopt a vetting process to ensure that members appointed to boards and regulatory bodies do not benefit from an affiliation with the greyhound racing industry.

### RSPCA Recommendation 6 accepted

Implement ongoing investigation and surveillance for live baiting and other serious animal welfare offences and enforce strong penalties for animal welfare offences.

### RSPCA Recommendation 7 accepted

Increase the monitoring and application of penalties for the use of banned substances. The risk of disciplinary actions must provide more incentive to curb their use.

### RSPCA Recommendation 9 accepted

Prohibit the routine use of surgical artificial insemination (AI). It is highly invasive, causes significant pain to female dogs and is already banned in some EU countries.

### RSPCA Recommendation 14 accepted

Implement a mandatory birth to death traceability system that tracks the circumstances, location, ownership and fate of individual greyhounds throughout their life cycle.

### RSPCA Recommendation 15 accepted

Verify all third-party adoptions (i.e., adoptions not through organisations like GAP) and follow up those that are genuine.

### **RSPCA Recommendation 19 accepted**

Mandatory requirement for GRSA representatives to report animal welfare issues (and participants leaving the industry) to RSPCA.

### **RSPCA Recommendation 22 accepted**

GRSA's Board should include a member(s) with specific animal welfare expertise, given that this is an animal business.

### **RSPCA Recommendation 24 accepted**

Requirement for industry participants to undertake training in animal welfare.

It should be noted that a number of other RSPCA recommendations were supported but are dealt with under recommendations elsewhere in this report. Others are redundant due to this Review recommending an independent inspector to oversight industry reforms.

## **Animal Justice Party**

A submission was received from the Animal Justice Party (AJP) which contained the following recommendations. As with the RSPCA submission, this report indicates which recommendations are supported.

### **AJP recommendation 3 accepted (with respect to greyhound welfare)**

Prioritise the welfare of human and non-human animals over the revenue generated by the greyhound racing industry.

### **AJP recommendation 7 accepted**

Actively pursue prosecution for any and all breaches of the *Animal Welfare Act 1985* (SA) perpetrated by members of the greyhound racing industry.

### **AJP recommendation 8 accepted**

Introduce, and enforce, a cap on breeding of greyhounds.

### **AJP recommendation 9 accepted**

Introduce whole-of-life tracking to monitor the welfare of greyhounds in the industry.

### **AJP recommendation 13 accepted**

Amend Freedom of Information legislation to ensure that there are no exemptions applicable to the racing industry.



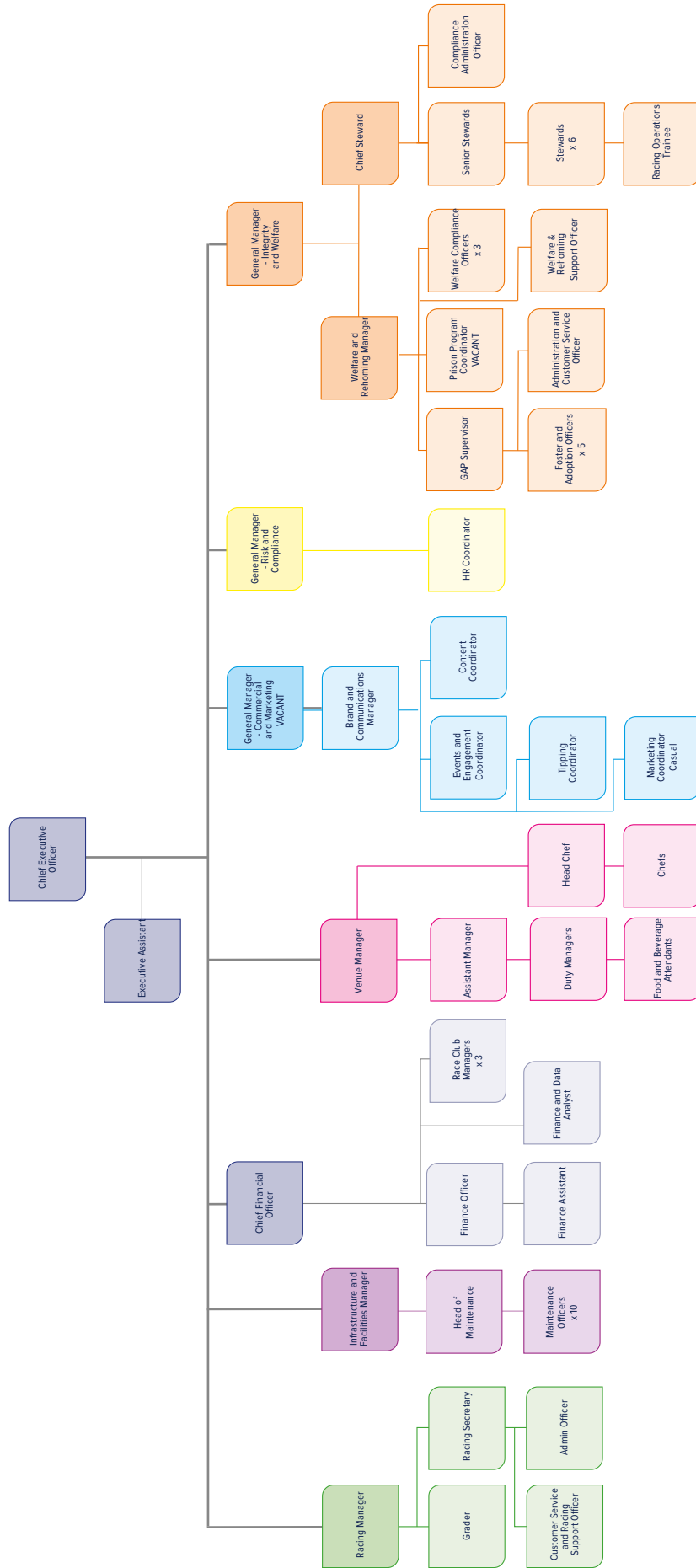


# Appendices

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**Figure 1: Greyhound Racing South Australia Organisation Chart**





**Table 1: Matters referred to RSPCA by GRSA**

Date of Report	Made by	Details (deidentified)	Action taken (as recorded by RSPCA)
13/04/2015	GRSA [redacted]	Multiple allegations of live baiting against several trainers	GRSA investigated and found no evidence during kennel inspection
May 2016	GRSA [redacted]	Allegations of rabbits being caught and traded to a participant	Monitor and await further information from GRSA
27/09/2016	GRSA [redacted]	Licensed trainers – allegations of dead greyhounds being burned in a pit at rear of property, happens 6 monthly	GRSA have done 3 kennel inspections at the property and have the trainers on a management plan due to property being messy and some non-welfare related issues, dogs appear well and healthy
13/12/2017	GRSA	7 deceased greyhounds and one live dog	Investigated by RSPCA
20/02/2017	GRSA [redacted]	Trainer disqualified for 4 months	For information only
22/02/2017	GRSA [redacted]	Trainer disqualified for 1 month for leaving dogs in trailer at races in hot weather	For information only
18/05/2017	GRSA [redacted]	Trainer purchased dog from disqualified by GRSA - threatening to euthanise dog or deliver to RSPCA	For information only
04/12/2017	GRSA [redacted]	Horse at races in horse float found to be sweating and hot in hot weather – horse unloaded, hosed down and removed from track	GRSA satisfied the horse was not harmed and have instigated an inquiry – is a rule breach to have other animals at the facility
10/01/2018	GRSA [redacted]	Woman arrested for having a very underweight greyhound – dog returned, no legal right to follow up as a GAP dog	Not stated
04/03/2018	GRSA [redacted]	Interstate trainer fled home state owing significant debt – has 50 greyhounds and will not be licensed in SA due to being unsuitable – dogs owned by interstate persons	GRSA have inspected property, are satisfied animals are cared for – cannot monitor since not licensed
26/10/2018	GRSA [redacted]	Hobby trainer received penalty, wholly suspended for poor kennelling standards- has been given deadline to comply, must reduce from 5 to 2 dogs	GRSA will continue to work with trainer to ensure compliance – dogs are healthy and no welfare concerns remain, just does not meet high standards required

Date of Report	Made by	Details (deidentified)	Action taken (as recorded by RSPCA)
21/12/2018	GRSA [redacted]	Former interstate resident declined trainer licence, 40 dogs in possession – no current welfare issue, however, may be highlighted by other members due to other disciplinary action – trainer trying to take heat off issue by badmouthing other	GRSA have inspected property, are satisfied animals are cared for – cannot monitor since not licensed
21/12/2018	GRSA [redacted]	Hobby trainer disqualified for 6 months for non-compliance with GRSA rules – no welfare issue, the 4-5 dogs are retired, working with GAP to rehome	GRSA working with GAP to rehome – no welfare concerns at this time
14/11/2019	GRSA [redacted]	Trainer found with 2 fox tails during recent kennel inspection, serious breach of the rules and may result in 10 year (effectively, life) ban – GRSA believes dogs in trainer's care not exposed to risk, means available for dogs to be moved to other trainers	GRSA holding stewards inquiry, has been adjourned for legal advice as of November 2019
28/09/2020	GRSA [redacted]	'Off muzzle' greyhound being trained at slipping track witnessed attacking a kangaroo hen released onto rack, effort made by witness and trainer to control both animals, kangaroo passed away on arrival at vet – GRSA advised inquiry will be undertaken	Integrity inquiry undertaken, found incident was accidental and unintentional – measures to be undertaken at club to ensure no further incidents occur
27/9/2021	GRSA [redacted]	Trainer by another licenced participant who attended his property to buy some equipment advised the dogs living conditions were filthy and covered in faeces and there was a starving horse on the property as well	RSPCA cruelty report created and investigated. No welfare issue detected upon inspection by RSPCA staff
9/11/2022	GRSA [redacted]	Trainer self-reported to GRSA that his dogs slipped the lead and killed a sheep (not his sheep) - dogs were allegedly muzzled but muzzles came off during the incident	GRSA investigated the trainer and incident. Not an animal welfare issue for RSPCA
23/8/2022	GRSA [redacted]	Live baiting allegation - anonymous video evidence provided to GRSA in Email	Investigation undertaken by RSPCA and GRSA
11/1/2023	GRSA [redacted]	Report with drone footage with dogs at [redacted] with dirty water pools	Investigated - shell pools are cooling only and drinking water is provided in a separate container for dogs - no other welfare issues
14/2/2023	GRSA [redacted]	Green collar greyhound killed kangaroo in Belair National Park	No owner details provided and local reporter was unable to provide owner details Information only at this time. Contacted Belair NP admin to advise if they have any further info to let us know



**Table 2: GRSA welfare related investigations/inquiries 2020-2023**

Year	Name	Forum	Charge/s or Potential Charges	Outcome	Outcome Published
2020	BURDA, Adam	IHP	Fail to provide vet care when it was apparent such attention was required in breach of GAR 106 Failed to notify GRSA that No Song had been euthanised by veterinary surgeon	IHP found not guilty to charge of failing to provide vet care. Burda pleading guilty of failing to notify re euthanasia and was fined \$200	Yes
2020	[Redacted]	Stewards	Greyhound euthanised in circumstances when it should have returned to GAP for further assessment. Local Rule 130(5) and (10)	Reprimanded	No
2020	[Redacted]	Stewards	Negligence re Kennel standards	No charges laid, closed without penalty, resolved by counselling (See case study 1)	No
2021	[Redacted]	Stewards	Kennels non-compliant with AWP – no protection from heat/cold, no bedding, green water. GRSA concerned for welfare of greyhounds [redacted].	Licence suspended, [redacted] retired to GAP and [redacted] transferred to son. Participant decided not to continue in the industry, licence was not renewed and therefore cancelled.	No
2021	[Redacted]	Stewards	Greyhound audit discrepancies, missing greyhounds confirmed as euthanised Breach of GAR 106	No charges laid	N/A
2022	[Redacted]	Stewards	Failed to provide veterinary attention to greyhound in October 2021 and failed to comply with lawful order of welfare officers and failed to attend inquiry	Not active in greyhound industry, registration cancelled. Must attend Inquiry before he can be considered for further registration.	No
2022	[Redacted]	Stewards	Prevented carrying out of kennel inspection on 9/5/22 and on 23/2/22 did not comply with Animal Welfare Policy	4 week suspension, fully suspended for 6 months from 29/6/22 (See case study 1)	No

Year	Name	Forum	Charge/s or Potential Charges	Outcome	Outcome Published
2022	[Redacted]	Stewards	Prevented carrying out of kennel inspection on 9/5/22 in aid of [redacted] (they refused entry to welfare compliance officers)	Reprimand	No
2022	[Redacted]	Stewards	Fail to notify re retired greyhound x 5 GAR 106(3)(a)	Reprimand and condition on licence that [redacted] is not to transfer or retire any greyhound in his custody or control without prior written consent of GRSA (See case study 2)	No
2022	[Redacted]	Stewards	Fail to comply with lawful order of welfare officer Fail to provide necessary veterinary attention Ill-treat greyhound [redacted] Fail to provide veterinary attention to [redacted] Insult officer of controlling body Engage in conduct detrimental to the welfare of greyhound racing	[Redacted] did not attend the Inquiry. Registration cancelled and \$2000 fine. Serious offences referred to IHP on date to be fixed, with licences suspended until hearing (should a licence be granted in future). (See case study 5)	No
2022	[Redacted]	Stewards	Retired greyhound incorrectly and then euthanised without notifying GRSA contrary to GAR 106(3)	[Redacted] did not attend the Inquiry. Stewards noted [redacted] no longer active in the industry and cancelled his registration. [Redacted] will not be considered for further registration unless and until he attends inquiry in relation to the charges.	No
2022	[Redacted]	Stewards	On 29/9/21, during kennel inspection, retired greyhound found injured. Charged with Fail to provide vet care (negligent) and belligerent conduct with a veterinary practice which was detrimental to the image of racing.	Stewards noted the greyhound was retired as a pet. Reprimand x 2 (See case study 4)	No
2022	[Redacted]	Stewards	Negligent re treatment options and impeding animal welfare officer during kennel inspection.	Suspension 7 days and reprimand. (See case study 3)	No

Year	Name	Forum	Charge/s or Potential Charges	Outcome	Outcome Published
2023	[Redacted]	IHP	Threatened a steward Failed to comply with Animal Welfare Policy Engaged in contemptuous conduct	Penalty imposed on 28/7/23: 9 month suspension backdated to 5 May 2023, suspended after 3 months for 12 months (i.e. his actual suspension period was 3 months) (See case study 8)	No
2023	[Redacted]	Stewards	Refused to allow welfare officers carry out inspection	To be diverted by way of guidance	No
2023	[Redacted]	Stewards	Kennel inspection found carcasses at premises which was found to be detrimental to the image of greyhound racing. Breach of GAR 165(a).	Stewards accepted carcasses were present because of [redacted]. Stewards had regard to fact that [redacted] had been suspended from greyhound racing from 7 September 2023 to the day of the Inquiry (11 September 2023) and reprimanded [redacted].	No

### Table 3: Summary of Rehoming and Euthanasia Obligations

Scenario	Obligation	LR – Local Rule GAR – Greyhound Australasia Rules
A greyhound is to be retired (either unraced or from racing)	Responsible person must use best endeavours to rehome a greyhound to a third party. Greyhound does not need to go through GAP Assessment if greyhound is able to re-homed privately.  If the greyhound is sold or ownership transferred in circumstances whether the registered person was aware or should have been aware that the greyhound was likely to be euthanised or exist in detrimental conditions, the registered person is guilty of a Serious Offence.	LR 130(1) LR 130(1A)
A greyhound who is retired as a pet, transferred to an adoption agency, or exported or surrendered to another agency	The owner or person responsible must notify GRSA within ten days if the greyhound lives in SA	GAR 22(1)(a)
Responsible Person has been unable to rehome retired or unraced greyhound to a third party despite best endeavours	Greyhound must first be assessed by GAP for suitability for rehoming at least 10 days after its last start.  If suitable for rehoming, the Responsible Person must rehome through GAP or with a third party in accordance with GAP's recommendations.  If further assessment required, greyhound must be presented to GAP for further testing and assessment.	LR 130(1), (3), (4), (5)
If retired or unraced greyhound is assessed by GAP as not suitable for rehoming and euthanasia is only option or suitable rehoming is not achievable	Responsible Person must ensure euthanasia is performed by a registered veterinary surgeon and comply with GAR 106(3).  A person must notify GRSA at least 10 working days before the euthanasia procedure. GRSA can make alternative orders in the best interests of the greyhound if necessary.	LR 130(6) and (6A)
Relevant greyhound has been euthanised by a vet on the grounds above	Vet certificate and the prescribed form must be lodged by the Responsible Person with GRSA within 2 days of the euthanasia procedure	LR 130(7) and GAR 22(1)(b)
When any greyhound is so seriously ill or injured and beyond treatment (in the opinion of a vet) that euthanasia is only option and prior assessment by GAP is not practicable	Participant must comply with GAR22(1)(b) and ensure that euthanasia is performed by a vet.  Participant must lodge vet certificate of euthanasia and the prescribed form with GRSA within 2 days (this overrules GAR 22(1)(b) 10 day requirement).	LR 130(8) and (9)
Participant has care, custody or control of a retired greyhound and participant transfers ownership to another person	Participant must notify GRSA at least 3 days before the transfer.	LR 130(1AA)
Participant has care, custody or control of a retired greyhound and participant intends to euthanise for any reason (other than an emergency)	Participant must notify GRSA at least 3 days before euthanasia procedure.	LR 130(1AA)(ii)



# Summary of Survey Results

Figure 1: Distribution of Role in Industry

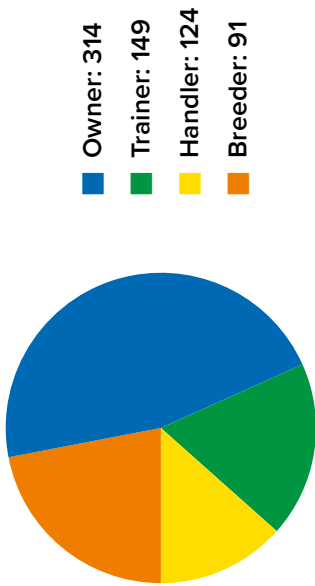


Figure 2: Distribution of Involvement in Industry

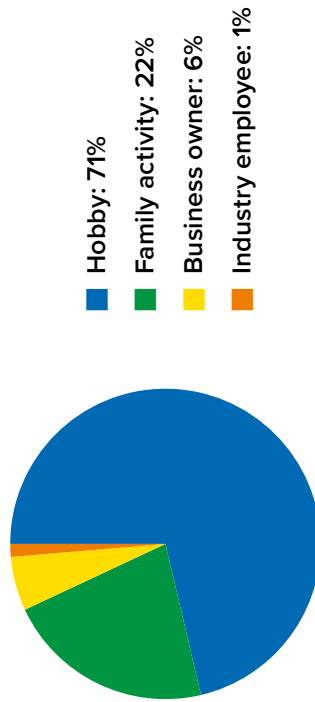


Figure 3: Number of Years in Industry

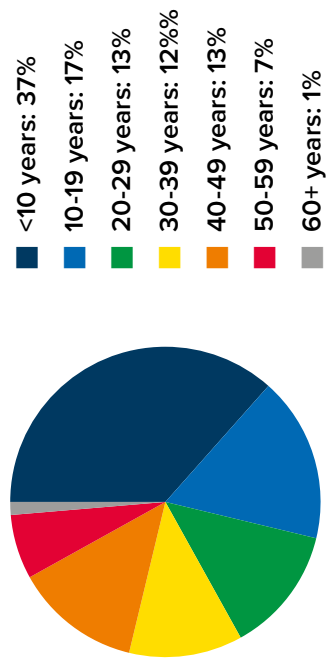


Figure 4: Cultural Descriptors of Industry from Survey Respondents (multiple answers allowed)

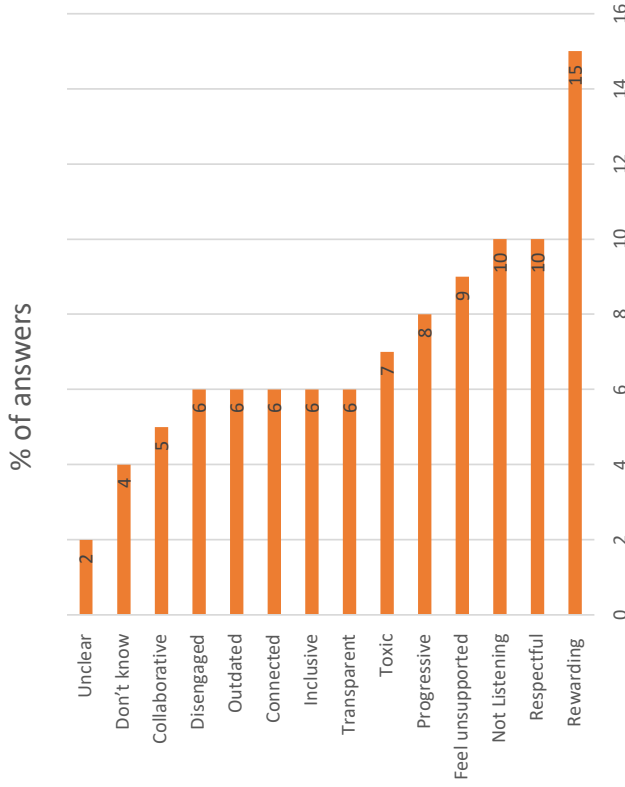
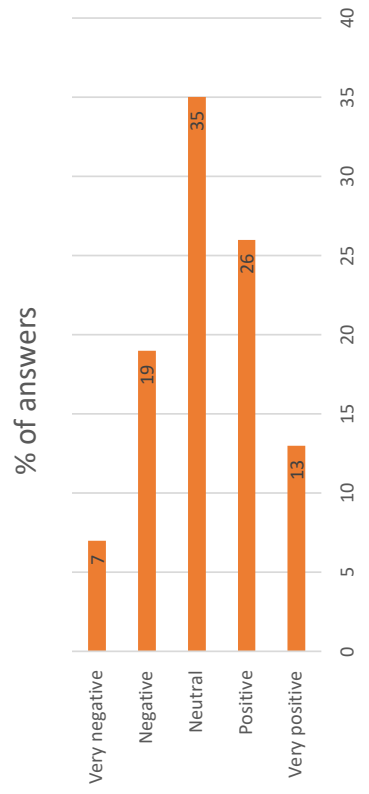


Figure 5: Sentiment of Respondents to Governance in Industry





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