

Progress of reforms in the South Australian Greyhound Industry 2024–2026

FINAL REPORT

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Greyhound Industry
Reform Inspector
September 2026



**Government of
South Australia**

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Glossary of Terms and Abbreviations

AJP	Animal Justice Party
Ashton Report	Report of the Independent Inquiry into the Governance of the Greyhound Racing Industry
Ashton Review	Independent Inquiry into the Governance of the Greyhound Racing Industry
AVA	Australian Veterinary Association
AWA	<i>Animal Welfare Act 1985</i> (SA)
BTG	Bridging the Gap Greyhound Rehoming SA
AWP	Greyhound Racing SA Animal Welfare Policy
Clue	GRSA Case Management and Intelligence Management System
DACO	Dogs and Cats Online
DCMB	Dog and Cat Management Board
DEW	Department for Environment and Water
FAQ	Frequently Asked Questions
FOI	Freedom of Information
FTE	Full-Time Equivalent (Employees)
GA	Greyhounds Australasia Ltd
GAP	Greyhounds As Pets (SA)
GARs	Greyhounds Australasia Rules
GIRI	Greyhound Industry Reform Inspector
GOTBA	Greyhound Owners, Trainers and Breeders Association (SA)
Government	State Government of South Australia
GRRAG	Greyhound Racing Reform Advisory Group
GRSA	Greyhound Racing South Australia Ltd

GRV	Greyhound Racing Victoria
GTS	Greyhound Traceability System
GWIC	Greyhound Welfare & Integrity Commission (NSW)
HRSA	Harness Racing SA
IHP	Integrity Hearings Panel
IWC	Integrity Welfare Committee
LRs	Greyhound Racing SA Local Rules
ORSR	Office for Recreation, Sport and Racing
OTV	On-Track Veterinarian
PBD	Preferential Box Draw
PPC	Angle Park Pet Placement Centre
QRIC	Queensland Racing Integrity Commission
RIRP	Race Injury Review Panel
RSPCA	Royal Society for the Prevention of Cruelty to Animals (SA)
RSWG	Racing Safety Working Group
RWWA	Racing and Wagering Western Australia
SAI	Surgical Artificial Insemination
SAPOL	South Australia Police
SOP	Standard Operating Procedure
TAFE SA	Technical and Further Education South Australia
TOR	Terms of Reference

SECTION 1

Executive Summary



The Ashton Report

In 2023 the Government of South Australia appointed Graham Ashton AM APM to undertake an *‘Independent Inquiry into the Governance of the Greyhound Racing Industry’*, hereafter referred to in this report as the ‘Ashton Review’. A report was subsequently delivered to Government (hereafter referred to in this report as the ‘Ashton Report’).

A copy of the Ashton Report can be found at: www.orsr.sa.gov.au/_data/assets/pdf_file/0019/972010/Greyhound-Racing-Inquiry-Report.pdf.

The Ashton Report made a total of 58 recommendations to be actioned by either Greyhound Racing South Australia (GRSA) as the greyhound racing controlling body or the State Government, hereafter referred to in this report as the ‘Government’.

During the Ashton Review, submissions were received from GRSA, the Royal Society for the Prevention of Cruelty to Animals (RSPCA) South Australia and the Animal Justice Party (AJP). Each organisation submitted recommendations to the Review, a number of which were accepted.

Consequently, the total number of recommendations arising from the Ashton Review was 87. Of these recommendations, 78 were the responsibility of GRSA and nine were the responsibility of the Government (See *Section 2 - Background for further information*).

The Greyhound Industry Reform Inspector

Recommendation 57 of the Ashton Report recommended, in part, the creation of a Greyhound Industry Reform Inspector (GIRI), whose role would be to monitor and report on the implementation of the recommendations and detail their satisfaction as to the industry’s level of reform after a two-year period. Sal Perna AM was appointed to the role and commenced his work on 8 July 2024. Mr Perna had previously held the role of the inaugural Racing Integrity Commissioner in Victoria for 11 years. This was the first independent racing integrity oversight role in Australia.

The *Greyhound Industry Reform Inspector Act 2024* came into effect on 27 February 2025, legally creating the GIRI role, setting down the GIRI’s major function to oversee and assess the implementation of the Ashton Report recommendations and providing powers to fulfil the requirements of the role.

This included powers to:

- appoint authorised officers,
- require information,
- enter and inspect premises, and
- gather and share information.

The legislation also required that the GIRI provide a final report to the Minister (Minister for Recreation, Sport and Racing), who must then lay a copy of the report before both Houses of Parliament within 12 sitting days.

GIRI Methodology

A two-year plan was created by the GIRI to help structure his work (See Attachment 2). This included a focus on developing an understanding of both GRSA and the greyhound racing industry in SA through a concerted stakeholder engagement and familiarisation program. It included attendance at race meetings to observe operations and activities relevant to the recommendations, site visits to kennels, prisons and rehoming facilities, and establish regular meetings with GRSA and other key stakeholders.

The GIRI established a thorough recommendation verification process to review submissions that were provided to the GIRI each time a recommendation was submitted as completed (See Attachment 1 - Methodology). This process continued throughout the two-year reform period (8 July 2024 to 7 July 2026). Any recommendations that were not in place at the conclusion of the reform period were assessed as not completed.

The GIRI considered each recommendation for completion by assessing the evidence provided or sought. The GIRI then determined whether there was sufficient evidence to verify completion of the recommendation (See Attachment 3 – Analysis of Recommendations).

Statistics

GRSA completed 73 of the 78 recommendations (93.5%) it was accountable for. The five assessed as incomplete were not fully actioned within the reform period.

The Government was accountable for nine recommendations. Seven were assessed as complete. Two (RSPCA Recommendation 1 and AJP Recommendation 3) were deemed to be unable to be verified as they were regarded by the GIRI as position statements, rather than recommendations with assessable actions.

Level of Satisfaction

There was no target set for GRSA as to the number of recommendations which would be accepted as satisfactory by the GIRI. Whilst a completion rate of 93.6% could be considered as a significant achievement - there were many other considerations, including the nature of each recommendation, its effects, its level of significance and its proportionate value to the reform process. It should also be noted that the five recommendations responsible to GRSA and assessed as not complete by the GIRI relate to animal welfare.

Other considerations included:

- changes to GRSA's internal structures,
- staffing recruitments and departures,
- capital investments,
- and GRSA's commitment to change.

Additionally, instances of greyhound injuries and deaths and mistreatment of greyhounds by industry participants continued during the reform period.

The discontinuation of greyhound racing in other jurisdictions, including within Australia, and the ongoing discussion about the broader social licence for greyhound racing were other considerations.

Another major factor was the lack of a racing integrity oversight body in SA, which is currently the only state in this position. Many of the Ashton Report recommendations may not have been necessary if there had been an independent racing integrity body in place with oversight of the industry generally and GRSA specifically.

Final Decision

Through detailed analysis of the work undertaken to date to implement the Ashton Report recommendations, together with my observations and discussions with a wide array of people and organisations, I am satisfied with the greyhound racing industry's level of reform progress over the past two years. Accordingly, my recommendation is for the greyhound racing industry to continue in SA.

Notwithstanding, as proposed by the Ashton Report, there is a clear need for the establishment of an independent racing integrity oversight body with appropriate powers to ensure GRSA is held accountable to continue to both implement the actions required under each completed recommendation, and to complete the unfinished recommendations.

It is also vital that this new oversight body continues to monitor progress in key animal welfare metrics. This body would be tasked with the conduct of audits and the undertaking of investigations into allegations and complaints. The new body would also be empowered to hold private and public inquiries to ensure that the highest levels of welfare and integrity are maintained (See Section 4 - Final Decision).

The greyhound racing industry in SA has undergone a major reform process over the last two years. It has made significant reforms to most areas of its operations and administration. Those reforms must continue to give Government, key stakeholders and the general public confidence that greyhound racing should continue.

While there remains an ongoing risk to racing greyhounds, an independent integrity oversight body monitoring animal welfare standards, ensuring accountability and transparency, exposing poor practices, enforcing standards and investigating both internal and systematic issues - will materially reduce harm to greyhounds and support a greater level of public confidence in this industry.

The Ashton Report has set a benchmark for greyhound racing in SA to adhere to - a benchmark that a new oversight body can both enforce and build on.

SECTION 2

Background



Ashton Review

On 14 August 2023 the South Australian Premier, the Honourable Peter Malinauskas MP announced that an independent Inquiry would be conducted into the regulatory regime, operations, culture, governance and practices of the greyhound racing industry in South Australia.

This Inquiry was to be established in response to multiple highly publicised cases of animal abuse in the South Australian greyhound industry.

The South Australian Government established the ‘*Independent Inquiry into the Governance of the Greyhound Racing Industry*’ (in this report hereafter referred to as the Ashton Review).

The Ashton Review was conducted by Graham Ashton AM APM as Lead Reviewer, supported by Zoe Thomas as Review Director.

The Ashton Review provided an independent 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 Ashton Review investigated and made recommendations on a number of key areas including welfare, integrity, governance and racing operations.

The Ashton Review also considered a report issued in 2017 by McGrathNicol Advisory into Greyhound Racing South Australia’s (GRSA) integrity systems. The Review found that, while a number of recommendations from the McGrathNicol Report had been adopted and implemented, some of the key recommendations had not been implemented - or the measures taken to address a particular recommendation had fallen short of addressing the identified integrity risk.

During the Ashton Review a large number of submissions were received and analysed, and some submitter recommendations were adopted. Key stakeholders whose recommendations were adopted include GRSA, the Royal Society for the Prevention of Cruelty to Animals (RSPCA) South Australia and the Animal Justice Party (AJP) South Australia.

The final report of the Ashton Review (in this report hereafter referred to as the Ashton Report) was released on 30 November 2023. The Ashton Report contained 87 recommendations for implementation by GRSA and the Government.

Recommendation 57 recommended that the Government establish the role of an independent inspector for greyhound racing reform, to be known as the Greyhound Industry Reform Inspector (GIRI). The Ashton Report recommended that the GIRI should report on a regular basis to the Minister for Racing as to reform progress, and provide a final report after two years on the GIRI’s level of satisfaction with the reform progress.

The Government accepted all recommendations and established the role of the GIRI, appointing Sal Perna AM.

Greyhound Racing in SA

The following provides a statistical snapshot of the greyhound racing industry in South Australia (as per GRSA’s 2024/25 Annual Report).

- 792 individually registered participants, including:
 - 129 breeders
 - 233 trainers
 - 655 registered owners and handlers
- 1,902 kennels
- 5,093 races over 487 TAB race meetings
- 8 coursing* race meetings
- Contributed more than \$135 million annually to the SA economy
- Supported 949 FTEs

* NOTE: Coursing is a form of greyhound racing where two dogs chase a drag lure on a straight track.

Greyhound races are conducted by:

- Adelaide Greyhound Racing Club Incorporated (Angle Park)
- Gawler Greyhound Racing Club Incorporated (Gawler)
- Murray Bridge Greyhound Racing Club Incorporated (Murray Bridge East)
- Mount Gambier Greyhound Racing and Coursing Club Incorporated (Mount Gambier)
- Greyhound Owners, Trainers and Breeders Coursing Club Incorporated (Buckland Park)

The South Australian greyhound racing industry is governed by the Greyhounds Australasia Rules (GARs) and the GRSA Local Rules.

South Australia is the only state with no independent oversight body over any of the three racing codes (thoroughbred, harness, greyhound).

GRSA

GRSA is designated as the controlling authority for greyhound racing in South Australia pursuant to Section 6 of the *Authorised Betting Operations Act 2000* (SA).

GRSA is a company limited by guarantee in accordance with the *Corporations Act 2001* (Cth). GRSA is governed by its Constitution, its Board Charter and various policies and procedures adopted by GRSA. 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 2001* (Cth).

GRSA's Board comprises six Directors (five independent Directors and one non-independent Director).

GRSA is led by a CEO who reports to the Board and is supported by an executive team. GRSA employs a number of staff including full-time, part-time and casual employees to fulfil the organisation's functions.

GRSA is responsible for the regulation and enforcement of the animal welfare and integrity standards of the greyhound racing industry in SA. GRSA oversees compliance, registration, licencing, stewarding, and the commercial and racing operations of the industry.

GRSA is also responsible for rehoming retired and non-racing greyhounds through its Greyhounds As Pets (GAP) program.

GRSA receives Government funding annually through the return of the Point of Consumption Tax (POCT). The POCT is applied at a rate of 15 per cent of the net state wagering revenue of betting operators offering services in South Australia.

The three racing codes (Racing SA, GRSA and Harness Racing SA) are provided 20 per cent return of the POCT revenue annually as a grant by the State Government. This is distributed among the codes by market share.

GRSA publishes a monthly magazine to the industry titled *Kennel Capers*. This is the primary source of communication from GRSA to industry participants. It is referred to regularly throughout this report.

Greyhound Industry Reform Inspector

The GIRI commenced his duties on 8 July 2024.

The GIRI is provided powers through the *Greyhound Industry Reform Inspector Act 2024* which commenced on 27 February 2025 (the Act).

Under Section 4 of the Act, the GIRI is independent of the controlling authority, was not involved in the Ashton Review and has no role relating to greyhound racing in South Australia or any other jurisdiction. While employed by the Public Service, the GIRI performs his role in an independent capacity, and is not subject to any Ministerial direction or influence from any other party.

The two-year reform period was determined to be from 8 July 2024 to 7 July 2026.

The Act provides the GIRI with powers to require information, enter and inspect premises and share information. The GIRI had no reason to exercise these powers through the reform period as all requests to GRSA for information and access were met.

During this period the GIRI provided monthly reports to the Minister for Recreation, Sport and Racing detailing progress against the recommendations and other items of note. Three Ministers for Recreation, Sport and Racing held this office throughout the reform period; the Hon Katrine Hildyard MP, the Hon Emily Bourke MLC and the Hon Rhiannon Pearce MP.

The GIRI also published quarterly progress reports which were made publicly available on the Office for Recreation, Sport and Racing (ORSR) website.

The GIRI was supported throughout the reform period by ORSR. ORSR provided two staff members to support the GIRI on a 0.5 FTE basis throughout the reform period and on a full-time basis during the preparation of the final report. Actions conducted by the GIRI staff members were authorised by the GIRI and undertaken on his behalf.

Throughout the reform period, many people (including industry participants, Government and the media) lacked a clear understanding of the role of the GIRI. Many people reached out to the GIRI with complaints and reports of incidents, believing that the GIRI's role was investigatory and not monitoring and reporting. In these instances, the GIRI responded advising of the appropriate avenue for their enquiry. This caused some disappointment and confusion, especially from those looking for resolution of their issues outside of GRSA processes.

SECTION 3

GIRI Observations



Recommendations

Status Overview

Of the 78 Ashton Report recommendations assessed and verified by the GIRI over the two-year reform period, about one-third were focussed on integrity, governance and administration matters, with about two-thirds focused either directly or indirectly on animal welfare. While GSRA was assessed as completing the integrity, governance and administration-related recommendations, there remains some significant gaps in the animal welfare area that must be addressed as soon as possible. In particular, the following:

RECOMMENDATION 16

The GIRI was not satisfied that GSRA is effectively and fully addressing all animal welfare and unlawful conduct complaints.

RECOMMENDATION 44

The GIRI was not satisfied that GSRA is effectively and fully enforcing its Animal Welfare Policy 2021 in respect of:

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

This recommendation has been the subject of ongoing discussions with GSRA throughout the two-year reform period.

GSRA now requires:

- a 3.5m² minimum space requirement for greyhound kennels as recommended in the GWIC Code of Practice.
- that retired and spelling greyhounds retained by participants will be transitioned to housing of a minimum of 15m².

As GSRA's enforcement of this recommendation did not commence until 1 July 2026, the GIRI was not able to witness any evidence of enforcement prior to the completion of the reform period on 7 July 2026. Throughout the two-year period, GSRA has not submitted any evidence of any enforcement actions arising from the non-compliance of the AWP, in relation to Recommendation 44.

The Ashton Report was concerned with the welfare of South Australian greyhounds and saw an urgent need to enforce kennelling standards.

GSRA has been aware of the Ashton Report recommendations since November 2023,

when it was first released. There has been no evidence of any urgency being applied to the enforcement of this recommendation.

RECOMMENDATION 45

The GIRI was not satisfied that GRSA had taken sufficient steps to establish an adequate stand-alone facility to house greyhounds under its care and provide care for GAP greyhounds.

At the time of the Ashton Review, there were a total of 186 dogs requiring rehoming. In June 2026, GRSA advised that there are currently 257, not including those with third parties. The GIRI accepts that GRSA has taken steps to establish new facilities but the steps to date do not currently provide confidence that GRSA will satisfy its immediate or future GAP housing needs for dogs awaiting rehoming.

GRSA holds major accountability in greyhound welfare and rehoming. To this end, Recommendation 45 was an opportunity for GRSA to display leadership by prioritising efforts to complete this recommendation. The non-completion of this recommendation raises doubts that GRSA placed the expected emphasis on rehoming as part of its organisational responsibility.

RECOMMENDATION AJP 8

The GIRI was not satisfied that GRSA had taken sufficient steps to fully introduce, and enforce, a cap on breeding of greyhounds.

Recommendation AJP 8 required GRSA to take two distinct actions:

- Introduce a breeding cap, and
- Enforce the breeding cap.

The GIRI was satisfied by the information provided that a breeding cap was developed and introduced.

However, as the breeding cap was introduced on 1 July 2026 and communicated to the industry on 7 July 2026 (the final day of the reform period), there could be no verification by the GIRI of enforcement of the breeding cap.

In addition to the GIRI's assessment of the completion of the recommendations, there were a number of matters which arose during the reform period which the GIRI considers relevant to the South Australian greyhound racing industry. These encompassed:

- Issues and Incidents
- Other Jurisdictions
- Ongoing Welfare Concerns
- Social Licence

Issues and Incidents

During the reform period, significant incidents were reported by the media. These included:

- Welfare-related matters - including an industry participant being granted an owner's licence following an incident where a dog in their care died after being left unattended on a treadmill; mistreatment of greyhounds by high-profile trainers; deaths of greyhounds while in the custody of trainers; and trainers charged with doping offences.
- Multiple greyhound track deaths and significant injuries.
- GRSA staffing issues relating to allegations of stewards betting and departures of key GAP staff.
- A SafeWork SA investigation into an incident where a man was injured by the mechanical lure at Angle Park racetrack.
- Allegations made regarding the welfare of greyhounds at Angle Park Veterinary Clinic.
- Criticisms regarding the administration of the GRSA Hot Weather Policy.

Other Jurisdictions

The GIRI is conscious of decisions made throughout the reform period to close greyhound racing in New Zealand, Tasmania and in a number of overseas jurisdictions. The GIRI was in contact with stakeholders from both New Zealand and Tasmania regarding the ramifications of these decisions.

The GIRI is also aware of the reviews conducted in Queensland and New South Wales and current Government Standing Committee processes being undertaken in Western Australia and Tasmania.

At the time of the Ashton Report, there were only two Australian states without an independent integrity oversight body dedicated to the local greyhound racing industry – South Australia and Tasmania. The Tasmanian Racing Integrity Commissioner commenced on 1 February 2025, leaving South Australia as the sole state remaining without an independent greyhound racing integrity oversight body.

Ongoing Welfare Concerns

The Ashton Report identifies that “Animal welfare is the primary issue affecting the ongoing viability of greyhound racing in South Australia.” This remains the primary

concern of greyhound racing industries and the broader public. The most prevalent issues are the incidence of track injuries and fatalities, oversupply of racing dogs, treatment of greyhounds by participants and the housing environment provided for retired and racing dogs.

The biggest concerns remain over the potential for live-baiting or the unauthorised euthanasia of dogs.

While the implementation of the Ashton Report's recommendations will go some way to address these concerns, the risk of injury or death of greyhounds while racing will never be completely eliminated.

The potential for the oversupply of dogs will continue to be a rehoming challenge. Maintaining the optimal number of dogs to sustain racing operations whilst not creating an oversupply remains a balancing act.

In response to these ongoing welfare issues, a number of organisations continued to highlight their concerns, undertake public campaigns and lodge petitions to the Government to advocate for the discontinuation of greyhound racing in South Australia.

Social Licence

The ongoing welfare issues form the basis of the discussion about the social licence and the ethical considerations for the continuation of greyhound racing. As scrutiny increases and societal expectations change, it is likely the public's appetite for accepting these welfare risks will also continue to change.

It is important to note that the Ashton Report recommendations are focussed on changes in industry practices to drive improved animal welfare outcomes; and much good progress has been made in the two-year reform period.

Any new incidents will however continue to affect public confidence. Even while these significant reforms have been underway, there have been further controversies involving animal welfare and governance, making it harder for the industry to demonstrate that its past problems are behind it.

Social license also extends well beyond just industry practices to a range of factors which have driven a number of jurisdictions to abandon greyhound racing.

While the GIRI's role was to monitor the implementation of the Ashton Report's recommendations, the question of social licence will continue to be one for the Government.

It demonstrates however the need for continued strong independent oversight of the industry.

SECTION 4

Final Decision



Work of the GIRI

The basis of my work as the GIRI is Recommendation 57, which, in part, creates the role, outlines the features, functions and duties, and, most importantly, states that the role is to “*ultimately provide a final report after two years as to their level of satisfaction with the reform progress.*”

Recommendation 57 also states that “*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.*”

Level of Satisfaction

The Ashton Report made recommendations expected to result in significant reforms to South Australia’s greyhound racing industry. These were widespread reforms affecting both the controlling body (GRSA) specifically, and the greyhound racing industry generally. The scope of the recommendations impacted the areas of:

- Animal Welfare
- Governance
- Stewarding
- Staff Conduct
- Betting Compliance
- Prohibited Substances
- Complaint Handling
- Racing Operations
- Rehoming
- Culture
- Oversight

The report also made recommendations which had not been implemented arising from a McGrathNicol review undertaken in 2017.

GRSA was accountable for a total of 78 of the 87 recommendations. Over the two-year reform period, I was satisfied that GRSA completed 74 of those. At the completion of the reform period, whilst revisiting whether the actions arising from the recommendations were still continuing, one additional recommendation (Recommendation 16) was identified as not being completed as there was no evidence of its continuance.

From a statistical perspective, this resulted in 73 of the 78 recommendations, or 93.6%, being completed by GRSA.

It should also be noted that while four recommendations have been assessed as not being completed (Recommendations 44, 45, GRSA 13 and AJP 8), at the end of the reform period GRSA was still making progress towards their completion. The GIRI believes most of these recommendations can be achieved within a relatively short timeframe.

GRSA had no ‘pass mark’ for the number of recommendations it was required to complete during the two years. Whilst it was always hoped it would implement all recommendations, the completion of 93.6% of recommendations is still a significant achievement.

The level of satisfaction, however, is not solely based on statistics. Even if all the recommendations had been completed in the two-year period, there are additional factors that need consideration.

Positive factors include the appointment of a former RSPCA CEO to the GRSA Board; recruitment of the RSPCA SA Chief Inspector as the new GRSA GM Integrity and Welfare; hiring of intelligence and investigation expertise; investment of significant levels of expenditure in track safety, greyhound housing, a traceability system, an intelligence management system and rehoming facilities.

GRSA’s changes to staffing over the reform period are considered to have enhanced its ability to reform. In addition, the following instances are examples of where GRSA achieved more than was required within the recommendations:

- assisting industry participants financially to upgrade their kennels (Recommendation 39).
- introducing a Local Rule when an MOU with RSPCA was not forthcoming (Recommendation 36).
- constructing a Pet Placement Centre at Angle Park (no specific recommendation, but a rehoming issue).
- making training mandatory and for all trainers, not just those with higher injury rates (Recommendation RSPCA 24).
- creating a traceability system when eTrac was not available (Recommendation GRSA 17).

These actions give confidence that GRSA can continue its reform program.

However, for each of these there are also negative factors, particularly those that place the welfare of greyhounds at risk such as unauthorised euthanasia, mistreatment by industry participants, use of prohibited substances and racetrack injuries/deaths.

There are also other aspects regarding GRSA which fall outside the scope of this work but considered to be worthy of review. During the reform period there was no full-time, on-site GRSA Human Relations Manager and the scope, workload and ‘hands-on’ operational involvement of the GRSA CEO appeared inappropriate for that level.

In addition, whilst the majority of recommendations have been implemented, only time will tell how effective they prove to be.

The SA greyhound racing industry has made meaningful progress since the release of the Ashton Report. GRSA deserves recognition for implementing a substantial number of recommendations and driving important cultural and operational change.

Whilst progress should be recognised, it is equally important to acknowledge that key recommendations remain incomplete, some reforms have progressed slowly and there remains a risk that improvements achieved over the past two years could diminish if external scrutiny and public attention reduce.

Decision Considerations

A decision as to the level of satisfaction with the reforms is based on many factors. Statistics and positive/negative factors as outlined above, are just two.

Another relevant and important aspect is the recognition that SA is now the only Australian state operating without an integrity oversight body in any code of racing (thoroughbred racing, harness racing and greyhound racing). This was a key factor in the GIRI’s deliberations. At the time of the Ashton Report, Tasmania was the only other Australian state without a racing integrity oversight body, but it has since created the role of the Tasmanian Racing Integrity Commissioner.

Another factor was the recognition that greyhound racing is being discontinued in many parts of the world. This was given consideration but was not a compelling aspect in making a final decision.

The same could be said about social licence. It remains a critical issue but is a matter for government to consider in future decisions.

The Ashton Report prescribed the GIRI two options at the conclusion of the reform period – either to continue greyhound racing in SA with an oversight body or discontinue greyhound racing in SA. There was no option for business as usual.

Each of the recommendations and actions arising were examined closely (See Attachment 3 - Analysis of Recommendations). So too was the additional information, knowledge and experience gained from:

- observations at race meetings and site visits;
- interaction with industry participants, GRSA staff, key stakeholders, government departments and agencies, other jurisdictions, sports integrity and racing bodies; and
- expert advice from the GRRAG.

Consequently, I am satisfied that the implementation of the recommendations has resulted in significant reforms to enable the greyhound racing industry to continue in SA.

Oversight Model

Having come to the judgement that the greyhound racing industry should continue in SA, Recommendation 57 now requires me to *“express a view as to the most appropriate oversight model going forward”*.

Internationally and domestically, sports integrity bodies differ in size, scope, functionality and structure. The same applies for racing integrity oversight bodies specifically. As an example, in Queensland, QRIC oversees all three racing codes (thoroughbred, harness and greyhounds), whilst in NSW, GWIC oversees only greyhound racing. Some racing oversight bodies perform licencing and registration functions, whilst others do not, and some have the stewarding function within the integrity oversight body, opposed to others that have stewards within the controlling body.

In my view, there is not one ideal racing integrity oversight model. Each has positives and negatives, but there is no best practice model, as there are numerous factors which have led to the creation of oversight bodies in their individual jurisdictions.

There are, however, a number of features which I recommend should be included in an SA racing integrity body.

1. Statutory

- Created by SA legislation that establishes the position of the Racing Integrity Commissioner. Legal status as a Statutory Authority. Legislated indemnity, powers, functions and authority.

2. Independence

- Independent of Government and the racing industry.
- Operates as an independent, standalone integrity body similar to the Independent Commission Against Corruption or the Office for Public Integrity.
- Appointed by the Governor with the advice and consent of the Executive Council.
- Reports to Parliament through an Annual Report.

3. Scope

- Oversight of the greyhound racing industry. Oversight of all welfare and integrity-related aspects of greyhound racing. Includes oversight of GRSA (Board, staff and contractors), all persons licenced or registered, committees, clubs and persons who were in those categories at time of the issue/matter under investigation but have since left.
- After three years, an assessment should be made by the Commissioner and Government as to the value of extending the scope to oversee thoroughbred and harness racing.

4. Staffing

- A Commissioner supported by Government staff.

5. Support

- Creation of an advisory committee (e.g. the GRRAG).

6. Functions

- Oversee greyhound racing industry welfare and integrity.
- Monitor administration and regulation within the industry.

- Conduct audits, as required, requested and annually of the GRSA processes and systems.
- Implement an ‘integrity hotline’ for receipt of information and complaints.
- Investigate information, allegations and complaints.
- Liaise with, exchange information and refer matters to relevant agencies e.g. SAPOL, RSPCA, GRSA.
- Investigate matters referred by the Minister for Racing or GRSA.
- Report findings, including publicly, as deemed necessary.
- Conduct ‘own motion’ inquiries.
- Make recommendations to GRSA and issue directions on compliance of recommendations made.
- Establish a direct reporting line with GRSA GM Integrity and Welfare as currently provided in Recommendations 30 and 38.
- Provide advice to the Minister as requested or when deemed necessary.
- Review GRSA proposals for policy, procedure or rule changes.
- Provide direction and consultation to GRSA on any matters deemed necessary.

7. Powers

- Advise Minister of failure by GRSA to act on recommendations.
- Do all things ‘necessary and convenient’ in the performance of duties.
- Employ staff as necessary eg. Employment of specialist staff (forensic examination, investigative auditing, drone operation)
- Obtain, exchange, disclose and refer information as required.
- ‘Coercive’ powers – summons persons/ documents; examine witnesses under oath/ affirmation; refer breaches for failure to appear, provide documents, or make false or misleading statements; provide indemnity for self-incrimination and protection for witnesses.

This integrity oversight body should be funded by Government and not the racing industry.

Legislation creating the racing integrity oversight bodies in each of the Australian states provides more comprehensive detail of the features outlined above.

In addition to the scope and functions of the new oversight body, I would recommend that a three-year work plan be created as the main focus of that body. This work plan would be centred on three main functions:

- Holding GRSA to account on each of the Ashton Report recommendations considered completed during the reform period to ensure their continuance. This includes ongoing oversight and monitoring of critical welfare recommendations e.g. track safety initiatives, injury reporting and rehoming.
- Assessing and advising the Minister, on whether the five recommendations not considered completed during the reform period have been actioned.
- The monitoring of key welfare statistics and benchmarks such as the assessment of SA injury and euthanasia rates, population monitoring (breeding and rehoming) and ongoing monitoring of industry participant conduct.

The Commissioner should establish regular reporting to the Minister for Recreation, Sport and Racing including the Annual Report to Parliament.

Interim Arrangements

The work of the GIRI concludes on submission of the final report, however the ongoing reporting requirements of GRSA should continue.

Prior to the establishment of the SA Racing Integrity Commissioner, it is recommended that GRSA report to the Chief Executive, Office for Recreation, Sport and Racing (on behalf of the Minister for Recreation, Sport and Racing). These include:

- Any ongoing progress of recommendations assessed as incomplete by the GIRI.
- Matters in relation to Recommendations 30, 38 and 57.

Conclusion

It is my view that animal welfare, integrity and public confidence must take precedence over commercial interests. Any ongoing government funding or support should be conditional upon continued compliance with best practice integrity and welfare standards.

The recommendation for the creation of an SA Racing Integrity Commissioner and office is not made lightly, as it will require financial investment by Government and support for the continuation of greyhound racing in SA. It may also draw negativity by both those who will be held to account, and those who would like to see the industry close.

Nor will the creation of an integrity body guarantee that welfare and integrity issues will be eliminated. What it does do, is create an independent body, able to operate without fear or favour, holding responsible people to account, and ensuring that everything that can be done to identify, address and manage ongoing concerns.

ATTACHMENT 1

Methodology



Industry Familiarisation

Upon his commencement, the GIRI conducted a process of industry familiarisation with the South Australian greyhound racing industry. This provided the GIRI with a wholistic understanding of the industry, its participants, processes and operations. It also provided greater context for the Ashton Report recommendations and the ongoing assessment of their implementation.

The GIRI completed this familiarisation period by:

- Meeting with key stakeholders
- Observations of staff conducting their duties
- Attendance at race meetings at all racetracks
- Visits to key sites (trainers' and breeders' properties, GAP facilities, veterinary practices and the GAP prison program)
- Consultation with industry participants (including trainers, breeders, handlers, kennel attendants, owners, veterinarians, lure drivers, starters, club staff and maintenance staff)
- Visits to other South Australian racing codes

Work Program

The GIRI's work program during the two-year reform period covered four phases:

- **Phase 1 (July to December 2024)** – Establishment, stakeholder engagement and industry familiarisation
 - Establishment of GIRI team
 - Meetings with Graham Ashton AM APM and Zoe Thomas
 - Engagement with key stakeholders (234 contacts including GRSA staff, the Integrity Hearings Panel, the Racing Appeals Tribunal, Racing SA, Harness Racing SA, the Royal Society for the Prevention of Cruelty to Animals [RSPCA], Greyhounds Australasia, veterinarians, the Coalition for Protection of Greyhounds [CPG], the Animal Justice Party)
 - Visits to existing Greyhounds As Pets (GAP) facilities
 - Visits to industry participant properties
 - Observation of race day procedures at race meetings (Angle Park, Gawler, Mount Gambier, Murray Bridge, Virginia Coursing)
 - Visits to thoroughbred and harness race meetings
- Engagement with Government stakeholders (South Australia Police [SAPOL], the Department for Environment and Water, Consumer and Business Services)
- Visit to RSPCA operations at O'Halloran Hill
- Observation of GAP processes (Green Collar Assessment)
- Visit to GAP operations at Mobilong Prison
- Establishment of the Greyhound Racing Reforms Advisory Group (GRRAG)
- Commencement of Ministerial reporting and public reporting
- Commencement of monitoring and tracking of recommendations
- Commencement of observation and review of reform progress
- **Phase 2 (January to June 2025)** – Continuation of engagement and monitoring
 - Continuation of monitoring and tracking of recommendations
 - Continuation of observation and review of reform progress
 - Continuation of Ministerial reporting and public reporting
 - Proclamation of GIRI legislation
 - Ongoing engagement with stakeholders (GRSA staff and Board, RSPCA, GRRAG, CPG)
- **Phase 3 (July to December 2025)** – Comparison studies and benchmark analysis
 - Continuation of monitoring and tracking of recommendations
 - Continuation of observation and review of reform progress
 - Continuation of Ministerial reporting and public reporting, including the submission of a one-year progress report
 - Ongoing engagement with stakeholders (GRSA staff and Board, RSPCA, GRRAG, CPG)
 - Entered into a Memorandum of Understanding with SAPOL for the purpose of exchanging information, reporting relevant information and requesting assistance if required
 - Comparison studies conducted with integrity, government and racing industry bodies in New Zealand, Queensland, New South Wales and Western Australia

- Visits to greyhound rehoming facilities in New Zealand, Queensland and New South Wales
- Attendance at South Australian Parliament Budget and Finance Committee
- **Phase 4 (January to July 2026)** – Continuation and finalisation of reform period
 - Continuation and finalisation of monitoring and tracking of recommendations
 - Commencement of revisit of previously verified recommendations
 - Continuation of observation and finalisation of review of reform progress
 - Continuation of Ministerial reporting and public reporting
 - Site visits including GAP Operations at Adelaide Women’s Prison and Adelaide Pre-Release Centre, race meetings, proposed GAP facility at Adelaide Plains, kennel inspections at trainer properties
 - Ongoing and final engagement with stakeholders (GRSA staff and Board, RSPCA, GRRAG, CPG)
 - Comparison studies conducted with racing integrity bodies in Victoria and Tasmania

Over the two-year reform period the GIRI had 653 contacts with stakeholders, including industry participants. The GIRI attended nine greyhound race meetings at five racetracks, one thoroughbred race meeting and one harness race meeting. The GIRI conducted 38 site visits to greyhound racing-related operations.

During the reform period, the GIRI:

- Reported on reform progress both publicly and to the Government.
- Provided monthly reports to the Minister for Recreation, Sport and Racing.
- Regularly met in-person with the Minister’s office.
- Published a quarterly publicly available progress report on the ORSR website.
- Met with the Premier and provided a progress report.
- Met with the Opposition Leader and the Shadow Racing Minister

Recommendation Verification Process

The Ashton Report made 87 recommendations in total, including the Ashton Review’s adoption of 29 recommendations made by submitters to the review. The 87 recommendations comprised of:

- 58 Ashton Report recommendations
- 14 GRSA recommendations
- 10 RSPCA recommendations
- 5 AJP recommendations

All 87 recommendations were accepted by the South Australian Government.

The accountability for the implementation of these 87 recommendations was as follows:

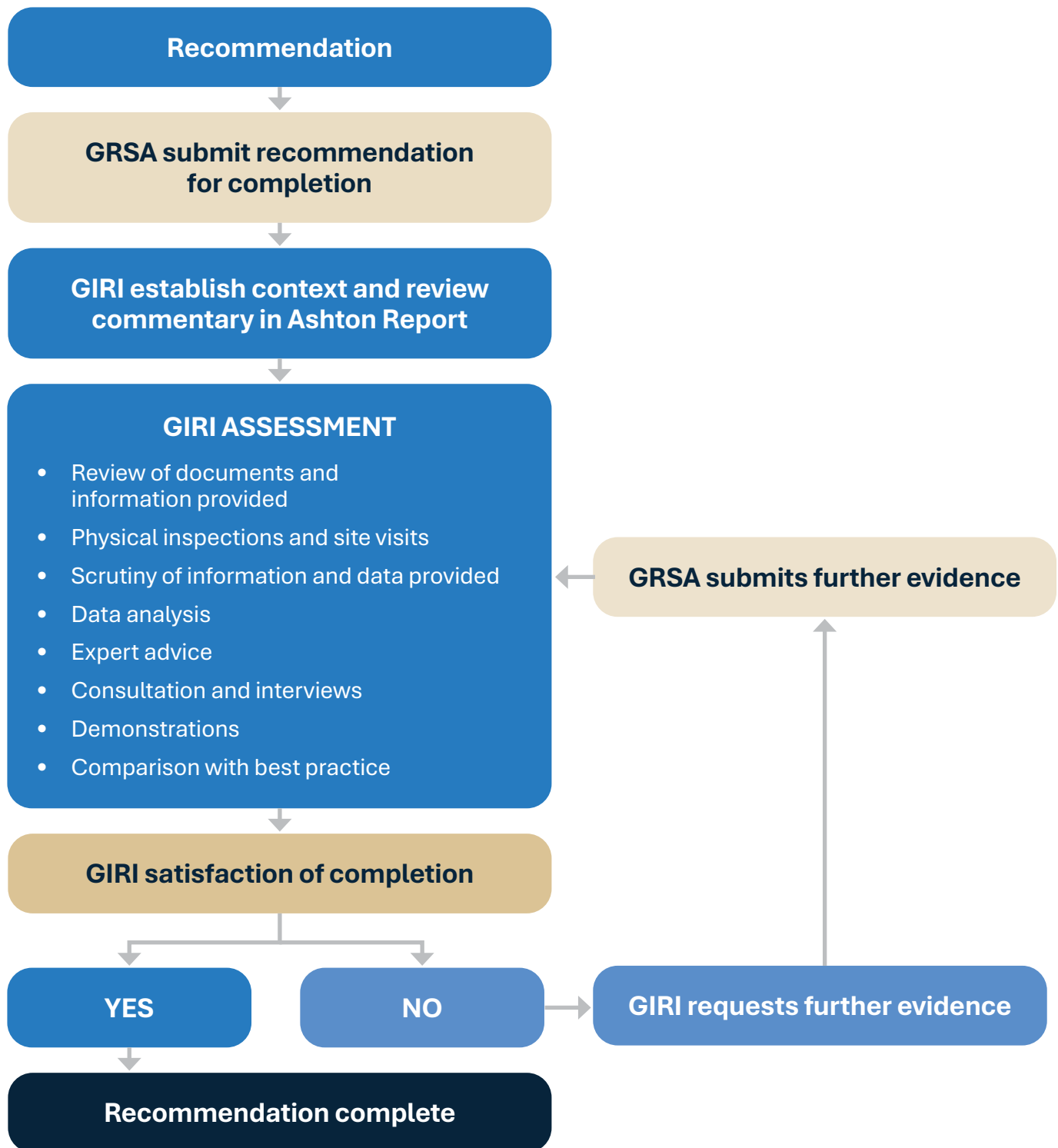
- 78 were the responsibility of GRSA
- 9 were the responsibility of the Government.

It should be noted that Recommendation 25 of the Ashton Report required 10 unique actions (therefore GRSA was, in effect, responsible for more than 78 recommendations). The 10 parts of Recommendation 25 are reviewed individually within Attachment 3 - Analysis of Recommendations.

The GIRI established a framework and explored sufficient evidence to verify whether each relevant recommendation had been completed or otherwise by GRSA.

The GIRI was not able to examine the efficacy or success of the intended outcome of each completed recommendation due to the defined reform period.

The verification framework is set out in the flowchart below.



The verification of recommendations was an ongoing process where GRSA submitted a proposal for completion and the GRI assessed whether the information provided was sufficient to verify completion of the recommendation. Where necessary the GRI then asked GRSA for further information and the cycle repeated until the recommendation was deemed complete, or the two-year period had ended.

Many recommendations were subject to revisits by the GRI following his initial verification. This enabled the GRI to ensure GRSA's continued and ongoing compliance with the recommendation.

The revisit process included:

- visiting racetracks to witness utilisation of new track equipment and race day operations.
- requesting provision of internal documentation - Board Papers, Board Minutes, Annual Declarations.
- requesting evidence of internal data - Stewards Reports, swabbing, racing, injury and enforcement data.

The revisit process has been included within Attachment 3 - Analysis of Recommendations.

Engagement with GRSA

GRSA was the key stakeholder with primary accountability for implementing the majority of the Ashton Report recommendations. The GRI met and corresponded regularly with GRSA staff and senior management. The primary points of contact throughout the period were the CEO, and the General Manager responsible for integrity and welfare. The General Manager Integrity and Welfare also had specific responsibilities in communicating with the GRI in relation to Recommendations 30, 38 and 57. The GRI also met with the Board and Chair of GRSA on a number of occasions throughout the reform period.

Greyhound Racing Reform Advisory Group

In the first quarter of the two-year reform period, the GRI established a Greyhound Racing Reform Advisory Group (GRRAG) as set out in Recommendation 57 of the Ashton Report. The GRRAG was established to provide professional advice to the GRI on its members' specific areas of expertise. The GRI consulted with GRRAG members regularly throughout the reform period to assist in his deliberation of the verification of the recommendations.

Comparison Studies

The GRI undertook comparison studies with other racing jurisdictions. This included visits to New South Wales, Queensland and New Zealand. The GRI also consulted with key bodies from Victoria, Tasmania and Western Australia.

This provided insight into major integrity and welfare models, learnings from visits to other rehoming facilities and engagement with those with experience in government reviews.

The GRI also observed operations at Racing SA and Harness Racing SA race meetings and met with key personnel from each code.

These comparison studies provided valuable understandings towards forming a judgement for the final decision.

Acknowledgements

An extensive list of people and organisations assisted the GRI throughout the reform period by providing their knowledge, advice, experience and support, at times in confidence.

The GRI wishes to acknowledge the time and effort volunteered by these key stakeholders whose contributions helped inform the GRI's work. The GRI thanks these parties for their generosity.

ATTACHMENT 2

GIRI Two-Year Program



GIRI Two-Year Program

PHASE 1

July to December 2024

- Establish GIRI team
- Meet with Ashton Review team
- Undertake relevant site visits (e.g. GAP facility)
- Initiate recording/reporting system
- Establish regular Ministerial briefings
- Establish regular GRSA meetings
- Initiate and undertake stakeholder engagement program
- Observations of race days (including thoroughbred and harness)
- Establish Greyhound Racing Reform Advisory Group (GRRAG)
- GIRI legislation drafted and passed
- Draft appointment of delegated person procedures and instruments
- Commence monitoring and tracking of recommendations
- Initiate public reporting process
- Development of verification framework

PHASE 2

January to June 2025

- Continue monitoring, tracking, and reporting, including:
 - Ministerial briefings
 - Monthly GIRI reports
 - Quarterly public reports
- Prepare and plan comparison study/visitation program with relevant oversight bodies
- Continue stakeholder engagement:
 - RSPCA
 - MRSR
 - ORSR
 - GRSA
 - GRRAG
 - SAPOL
- Continue industry familiarisation
- Proclamation of GIRI Act
- Race meeting attendance

PHASE 3

July to December 2025

- Continue monitoring and tracking:
 - Ministerial briefings
 - Monthly/quarterly GIRI reports
 - Quarterly public reports
- Convene GRRAG meeting
- Submit one-year progress report (halfway)
- Commence comparison study/visitation program
- SAPOL MOU
- Commence planning for drafting of final report
- Undertake further site visits

PHASE 4

January to July 2026

- Continue monitoring and tracking:
 - Ministerial briefings
 - Monthly/quarterly GIRI reports
 - Quarterly public reports
- Continue comparison study
- Revisit recommendations to ensure they are still in place and being practiced
- Continue site visits

FINAL REPORT

July to September 2026

- Final analysis of recommendations
- Drafting of final report
- Submit final report to Government

ATTACHMENT 3

Analysis of Recommendations



Summary of Recommendation Analysis

This section analyses each of the recommendations from the Ashton Report, providing the background, the date of verification and the verification process in determining whether the recommendation had been completed or otherwise.

The GIRI also conducted revisits of recommendations, as deemed required, to ensure ongoing compliance since the initial recommendation verification date.

GRSA were allocated a two-year period from July 2024 to July 2026 to action recommendations arising from the Ashton Report, published in November 2023.

A statistical snapshot is included below.

Accountable Party	Total Recs	Recs completed	Recs not completed	Recs unable to be verified
GRSA	78	73	5	None
SA Government	9	7	None	2
TOTAL	87	80	5	2

At the conclusion of the two-year period, GRSA was assessed as not having completed five recommendations:

- Recommendation 16 - Implement complaint management procedure as overseen by GRSA Integrity Welfare Committee (Recommendation 16 was initially verified as complete however was consequently re-assessed as incomplete following insufficient evidence of ongoing compliance with the recommendation).
- Recommendation 44 - Urgently enforce the GRSA Animal Welfare Policy regarding the minimum space housing requirements for non-racing greyhounds.
- Recommendation 45 - Acquire a stand-alone GAP facility.
- Recommendation GRSA 13 - Expand the GAP SA foster program to other prisons including Mount Gambier Prison.
- Recommendation AJP 8 - Introduce and enforce a breeding cap.

Two recommendations were unable to be assessed for completion:

- Recommendation RSPCA 1 – The industry should not be supported unless inherent animal welfare problems are recognised and resolved.
- Recommendation AJP 3 – Prioritise welfare over revenue.

These two recommendations were considered as policy statements and did not outline specific actions which could be measured.

This section outlines the steps taken to verify each recommendation. This was undertaken as a process where further evidence was sought by the GIRI until his satisfaction of the completion of the recommendation, or until the conclusion of the two-year period. Therefore, this section is written in a transaction-based manner.

Recommendations

RECOMMENDATION 1	30	RECOMMENDATION 25.1	62
RECOMMENDATION 2	31	RECOMMENDATION 25.2	63
RECOMMENDATION 3	32	RECOMMENDATION 25.3	64
RECOMMENDATION 4	34	RECOMMENDATION 25.4	65
RECOMMENDATION 5	35	RECOMMENDATION 25.5	67
RECOMMENDATION 6	37	RECOMMENDATION 25.6	68
RECOMMENDATION 7	39	RECOMMENDATION 25.7	69
RECOMMENDATION 8	40	RECOMMENDATION 25.8	71
RECOMMENDATION 9	41	RECOMMENDATION 25.9	72
RECOMMENDATION 10	42	RECOMMENDATION 25.10	73
RECOMMENDATION 11	44	RECOMMENDATION 26	74
RECOMMENDATION 12	45	RECOMMENDATION 27	76
RECOMMENDATION 13	47	RECOMMENDATION 28	77
RECOMMENDATION 14	48	RECOMMENDATION 29	78
RECOMMENDATION 15	49	RECOMMENDATION 30	79
RECOMMENDATION 16	51	RECOMMENDATION 31	80
RECOMMENDATION 17	52	RECOMMENDATION 32	82
RECOMMENDATION 18	53	RECOMMENDATION 33	83
RECOMMENDATION 19	55	RECOMMENDATION 34	84
RECOMMENDATION 20	56	RECOMMENDATION 35	86
RECOMMENDATION 21	57	RECOMMENDATION 36	87
RECOMMENDATION 22	58	RECOMMENDATION 37	89
RECOMMENDATION 23	59	RECOMMENDATION 38	90
RECOMMENDATION 24	61	RECOMMENDATION 39	92

RECOMMENDATION 40	95	RECOMMENDATION GRSA 9	138
RECOMMENDATION 41	96	RECOMMENDATION GRSA 13	139
RECOMMENDATION 42	98	RECOMMENDATION GRSA 14	140
RECOMMENDATION 43	99	RECOMMENDATION GRSA 15	141
RECOMMENDATION 44	100	RECOMMENDATION GRSA 16	142
RECOMMENDATION 45	103	RECOMMENDATION GRSA 17	143
RECOMMENDATION 46	107	RECOMMENDATION GRSA 18	145
RECOMMENDATION 47	108	RECOMMENDATION GRSA 19	146
RECOMMENDATION 48	111	RECOMMENDATION GRSA 20	147
RECOMMENDATION 49	113	RECOMMENDATION RSPCA 1	149
RECOMMENDATION 50	115	RECOMMENDATION RSPCA 3	150
RECOMMENDATION 51	117	RECOMMENDATION RSPCA 6	152
RECOMMENDATION 52	120	RECOMMENDATION RSPCA 7	154
RECOMMENDATION 53	121	RECOMMENDATION RSPCA 9	155
RECOMMENDATION 54	122	RECOMMENDATION RSPCA 14	158
RECOMMENDATION 55	123	RECOMMENDATION RSPCA 15	161
RECOMMENDATION 56	124	RECOMMENDATION RSPCA 19	162
RECOMMENDATION 57	125	RECOMMENDATION RSPCA 22	164
RECOMMENDATION 58	130	RECOMMENDATION RSPCA 24	165
RECOMMENDATION GRSA 1	132	RECOMMENDATION AJP 3	166
RECOMMENDATION GRSA 3	133	RECOMMENDATION AJP 7	167
RECOMMENDATION GRSA 4	134	RECOMMENDATION AJP 8	168
RECOMMENDATION GRSA 5	135	RECOMMENDATION AJP 9	170
RECOMMENDATION GRSA 8	137	RECOMMENDATION AJP 13	172

RECOMMENDATION 1 – COMPLETED

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.

CONTEXT

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

The Ashton report noted "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."

The Ashton Report observed "...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."

Further context is included on page 27 and 28 of the Ashton Report.

DATE VERIFIED

11 September 2024

VERIFICATION PROCESS

GRSA advised that a new IWC Charter had replaced the Terms of Reference referred to in the Ashton Report.

GRSA submitted the new IWC Charter with Section 4.5 stating that "A current member of the Integrity Hearings Panel (IHP) cannot be a Member (of the IWC)" and Section 5.1 stating that "The Board appoints the chair of the IWC who can be an independent non-executive director, but not the chair of the Board (Chair), and cannot be a current member of the IHP."

GRSA submitted a March 2024 Circular Resolution evidencing Board approval of the new IWC Charter. The IWC Charter is also available on the GRSA website for public access.

The GIRI noted the change in membership of both the IWC and IHP.

The GIRI witnessed the new IWC Charter. The GIRI also viewed the IWC Charter on the GRSA website.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In July 2026 the GIRI sighted subsequent Minutes of IWC meetings and determinations from IHP hearings and confirmed no membership crossover between the bodies since the initial recommendation verification date.

RECOMMENDATION 2 – COMPLETED

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.

CONTEXT

The Ashton Report noted that “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.”

Further context is included on pages 27 and 28 of the Ashton Report.

DATE VERIFIED

25 June 2025

VERIFICATION PROCESS

GRSA submitted an updated Board Charter including the duties and responsibilities of the GRSA Board in relation to integrity and welfare included within the “Accountability” section.

The updated Charter reads:

4. Accountability

- *Overseeing GRSA’s commitment to integrity and welfare. To support this responsibility, the Board:*
 - *Recognises the Integrity and Welfare Committee (IWC) as a key governance body reporting to the Board on matters of integrity, ethical conduct, and animal welfare.*
 - *Ensures that the IWC’s reports are considered in the Board’s decision-making processes.*
 - *Requires that the IWC’s minutes be included as a standing item on the Board’s agenda to facilitate regular oversight and discussion of integrity and welfare matters.*

A copy of the Board Charter is also accessible on the GRSA website.

GRSA submitted its May 2025 Board Minutes evidencing approval of the updated Board Charter.

GRSA submitted Affirmation Statements from all Board Directors stating they had read, understood and would comply with the requirements of the Charter.

GRSA submitted its 2024 and 2025 Board Agendas.

The GIRI sighted the Board Charter with the updated “Accountability” section including the duties and responsibilities of the Board in relation to integrity and welfare. The GIRI confirmed the Board’s approval of the updated Charter. The GIRI observed that the 2024 and 2025 Board Agendas included the IWC Minutes as a standing item. The GIRI also sighted the Board Directors’ Affirmation Statements.

The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In July 2026 the GIRI sighted subsequent Board Agendas since the initial recommendation verification date and confirmed IWC Minutes remains a standing item at Board meetings.

RECOMMENDATION 3 – COMPLETED

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.

CONTEXT

Recommendation 3 was one of a number of recommendations arising from the 2017 McGrathNicol report that were not implemented.

The Ashton Report noted GRSA “...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.”

The Ashton Report recommended that GRSA’s “...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.”

Further context is included on page 33 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 July 2025

VERIFICATION PROCESS

GRSA submitted an updated Constitution re-defining the Objects of the Company to reflect the function of GRSA as the Controlling Authority for greyhound racing.

The updated Constitution states:

Part 2 – Power and Objects of the Company

4. Objects

4.1 Where the Corporations Act 2001 provides that the Company or its officers may do a thing, or decline to do a thing, if authorised or otherwise prevented by the Constitution, that permission is given.

4.2 Notwithstanding the above, the objects for which the Company is established include, but are not limited to the following:

- (a) to be the controlling authority for greyhound racing in South Australia;*
- (b) to promote ethical, fair and professional conduct within, and the integrity of, the greyhound racing industry in South Australia;*
- (c) to support and drive the industry’s commitment to world leading animal welfare standards in South Australia;*
- (d) to encourage, promote and conduct the sport of greyhound racing in South Australia;*
- (e) to make greyhound racing more attractive and effectively market greyhound racing in South Australia;*
- (f) to enhance, encourage and promote all aspects of greyhound racing by providing an efficient and effective gaming environment in South Australia;*
- (g) to increase the returns of owners, breeders and trainers from participation in greyhound racing in South Australia; and*
- (h) to encourage and promote the protection and preservation of the history of the greyhound industry in South Australia.*

GRSA submitted an updated Board Charter outlining the Board’s role in driving and upholding integrity within the greyhound racing industry in South Australia.

GRSA submitted the Minutes from its Annual General Meeting (AGM) held in June 2025 evidencing Company Members had voted in favour of amending the Constitution to include the updates.

The updated Board Charter reads:

4. Accountability

- *Overseeing GRSA’s commitment to integrity and welfare. To support this responsibility, the Board:*
 - *Recognises the Integrity and Welfare Committee (IWC) as a key governance body reporting to the Board on matters of integrity, ethical conduct, and animal welfare.*
 - *Ensures that the IWC’s reports are considered in the Board’s decision-making processes.*
 - *Requires that the IWC’s minutes be included as a standing item on the Board’s agenda to facilitate regular oversight and discussion of integrity and welfare matters.*

GRSA submitted its May 2025 Board Minutes evidencing approval of the updated Board Charter.

GRSA submitted Affirmation Statements from all Board Directors stating they had read, understood and will comply with the requirements of the Board Charter.

The GRI sighted the amended Constitution including definition of the Objects of the Company to reflect the function of GRSA as the Controlling Authority for greyhound racing. The GRI confirmed the AGM Minutes recording of Company Members’ support of the amendments to the Constitution.

The GRI sighted the updated Board Charter with new information outlining the Board’s role in driving and upholding integrity within the greyhound racing industry in South Australia. The GRI confirmed the Board’s approval of the updated Board Charter. The GRI sighted the Board Directors’ Affirmation Statements.

The GRI verified this recommendation as complete.

RECOMMENDATION 4 – COMPLETED

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

CONTEXT

Recommendation 4 was one of a number of recommendations arising from the 2017 McGrathNicol report that were not implemented.

The Ashton Report noted that “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.”

Further context regarding this recommendation is included on page 35 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted its new policy outlining the process for private interests and probity statements – the ‘Conflict of Interest, Benefits, Gifts & Hospitality Policy & Probity Statement (Board of Directors)’.

GRSA submitted Board Minutes from the June 2024 meeting evidencing final Board approval of the policy.

GRSA submitted Material Personal Interests Policy Declarations submitted by each of the current Directors.

GRSA submitted completed Probity Statement and Declaration of Gifts forms submitted by each of the current Directors.

The GIRI sighted the new policy and Board Minutes approving the new policy. The GIRI witnessed Material Personal Interests Policy Declarations and Probity Statement and Declaration of Gifts submitted by all current Board Directors.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested copies of updated Board Director Material Personal Interests Policy Declarations and Probity Statement and Declaration of Gifts. The GIRI received these documents and confirmed submission for the 2025/26 financial year.

RECOMMENDATION 5 – COMPLETED

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

CONTEXT

Recommendation 5 was one of a number of recommendations arising from the 2017 McGrathNicol report that were not implemented.

The Ashton Report observed that the 2017 McGrath Nicol report noted “...the Steward’s Manual includes the roles, responsibilities and powers of stewards (race day and non-race day).”

The McGrathNicol report advised there were 17 elements that would need to be included within the Stewards Manual, consisting of:

- 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
- Race preparation
- Parading and starting
- Lure operation
- Race completion and catching
- Photo finishing and judging
- Swabbing procedures
- Steward inquiries
- Greyhound welfare.

Further context regarding this recommendation is included on page 36 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 July 2025

VERIFICATION PROCESS

GRSA developed and submitted a copy of the new Steward's Manual.

The GIRI was satisfied with the content of the Manual and was able to confirm each of the 17 McGrathNicol elements were included within the Manual. The GIRI was also satisfied that the Manual included document version control. However, the GIRI requested GRSA provide additional information as to evidence of implementation (i.e. steward training) and evidence of communication of the new Manual to the stewards.

GRSA subsequently submitted a steward staff meeting Agenda and communication from the Chief Steward. This evidence confirmed a stewards meeting had taken place where the new Manual had been a topic of discussion ensuring stewards were aware of their requirements and understood the new Manual.

GRSA also submitted an email from the Chief Steward circulating the Steward's Manual to all stewards.

GRSA submitted a further email from the Chief Steward to the Chief Operating Officer (COO) confirming all stewards had completed a one-on-one training session on the requirements of the new Manual.

Following submission of these further documents evidencing communication and implementation of the Manual, the GIRI verified this recommendation as complete.

RECOMMENDATION 6 – COMPLETED

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.

CONTEXT

Recommendation 6 was one of a number of recommendations arising from the 2017 McGrathNicol report that were not implemented. The recommendation pertained to GRSA's 'Integrity (Betting & Ownership) Policy', which was last reviewed in 2021.

The Ashton Report noted that "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."

Recommendation 7 requires GRSA to "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."

Further context regarding this recommendation is included on page 37 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

12 February 2026

VERIFICATION PROCESS

GRSA submitted the amended ‘Integrity (Wagering, Ownership and Gaming) Policy’ including elements listed within Recommendation 6.

GRSA submitted a Board Paper providing Board approval of the policy.

GRSA submitted a list of personnel (including all stewarding staff) that were required to submit an annual betting declaration.

GRSA submitted copies of the annual betting declarations of all required personnel (including stewarding staff) for 2025.

The GIRI reviewed the amended policy and confirmed it included the new information as prescribed in Recommendation 6. The GIRI sighted the Board approval of the amended policy. The GIRI witnessed annual betting declarations made by stewarding staff and confirmed declarations had been completed by all applicable stewarding staff. The GIRI affirmed the betting declarations contained the following elements:

- Acknowledgement of the policy.
- Confirmation of compliance with the policy.
- Details of all betting accounts with any betting agency.
- Details of wagering accounts in someone else’s name with whom the staff member placed a bet.

The GIRI verified this recommendation as complete.

RECOMMENDATION 7 – COMPLETED

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.

CONTEXT

Recommendation 7 was one of a number of recommendations arising from the 2017 McGrathNicol report that were not implemented.

Recommendation 6 required stewards to submit betting declarations and this recommendation extends that requirement to undertaking an audit with wagering providers of betting accounts in stewards' names.

Further context regarding this recommendation is included on page 37 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

3 April 2026

VERIFICATION PROCESS

GRSA submitted the amended Integrity (Wagering, Ownership and Gaming) Policy including elements listed within Recommendation 6.

GRSA submitted annual betting declarations of stewarding staff for 2025.

GRSA submitted a register of bookmakers (current as of 5 January 2026) containing the contact details of all wagering providers registered with GRSA.

GRSA submitted a copy of a letter from GRSA to wagering providers requesting confirmation as to whether GRSA-listed staff hold, or have held, betting accounts and, if yes, details of wagering activity and history. GRSA requested that betting activity be checked from the initial date of the GRSA staff member's employment with GRSA to 31 December 2025.

GRSA submitted a betting audit summary listing staff and identifying information, including whether bets had been made on greyhound racing in Australia, the relevant wagering provider, and whether the betting account had been disclosed in the annual betting declaration.

The GIRI reviewed the new process and sighted the annual betting declarations. The GIRI conducted an analysis of the audit process and acknowledged the audit outcomes.

The GIRI was satisfied that GRSA had conducted an audit on betting declarations and verified this recommendation as complete.

COMMENTARY

As an outcome of the betting audit, five GRSA employees were suspended pending investigation into potential breaches of GRSA policy. Following investigation, five stewarding staff members (three permanent, two casuals) were found to have breached the policy. Two staff were issued with first and final warnings, two staff were terminated from their current positions and one staff member resigned. GRSA advised no evidence of corruption, race fixing or race manipulation was found.

RECOMMENDATION 8 – COMPLETED

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.

CONTEXT

Recommendation 8 was one of a number of recommendations arising from the 2017 McGrathNicol report that were not implemented.

The Ashton Report noted that “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 Ashton Report was unable to confirm whether a Code of Conduct had been developed following the McGrathNicol report.

Further context regarding this recommendation is included on page 38 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

11 September 2024

VERIFICATION PROCESS

GRSA submitted a copy of its staff Code of Conduct.

GRSA submitted June 2024 Board Minutes evidencing Board approval of the updated Code of Conduct.

GRSA submitted a copy of its internal communication to all staff informing them of the new Code of Conduct. Staff were required to complete an acknowledgement of the updated Code of Conduct.

The GIRI reviewed the Code of Conduct document and ensured it contained all elements listed within Recommendation 8. The GIRI noted the Board approval of the updated Code of Conduct and sighted communication to all staff advising of its implementation.

The GIRI verified this recommendation as complete.

RECOMMENDATION 9 – COMPLETED

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.

CONTEXT

Recommendation 9 can be read in conjunction with Recommendations 10 and 11. GRSA consider these three recommendations as its new Integrity Framework.

The Ashton Report noted that “McGrathNicol observed that while GRSA had a staff Conflicts of Interest policy, there were no processes for managing conflicts.”

The Ashton Report found that “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.”

Further context regarding this recommendation is included on page 38 and 39 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

9 October 2025

VERIFICATION PROCESS

GRSA submitted the new ‘Staff Conflict of Interest Policy’ and Register (with no disclosures included). GRSA also submitted a Board Paper evidencing Board approval of the new policy.

The GIRI verified the policy and confirmed it had been expanded to include actual, perceived or potential conflicts of interest. The GIRI also sighted the Board approval.

However, the GIRI asked GRSA to submit a copy of the Register with disclosures included and staff acknowledgements of their requirements under the policy.

GRSA subsequently re-submitted the Conflict of Interest Register containing disclosures and evidence of staff acknowledgements of reading and understanding the policy.

The GIRI witnessed the Register containing disclosures and noted the staff acknowledgements.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested GRSA provide the current Conflict of Interest Register to ensure ongoing declarations and the management of conflicts of interest.

GRSA provided the updated Register and advised it is periodically reviewed by executive management.

The GIRI confirmed the Register was still being maintained by GRSA as of July 2026.

RECOMMENDATION 10 – COMPLETED

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

CONTEXT

Recommendation 10 can be read in conjunction with Recommendations 9 and 11. GRSA consider these three recommendations as its new Integrity Framework.

Recommendation 10 was one of a number of recommendations arising from the 2017 McGrathNicol report that were not implemented. The Ashton Report noted “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.”

Further context regarding this recommendation is included on page 39 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

3 February 2026

VERIFICATION PROCESS

GRSA submitted a new ‘Material Personal Interest Policy (Board Directors, Company Officers, Managers, Integrity and Other Identified Employees)’ and a template declaration form. GRSA also submitted Board Minutes evidencing approval of the new policy by the Board.

The GIRI reviewed the policy and template declaration form to confirm all elements prescribed by the McGrathNicol report were included. The GIRI noted approval of the policy by the Board.

The GIRI asked GRSA to provide a random sample of declarations of private interests made by senior management and integrity-related personnel.

GRSA subsequently provided copies of private interests declarations and copies of internal communications sent to staff regarding their requirements to declare their interests under the policy.

GRSA also provided a list of all senior management and integrity-related personnel who would be required to declare private interests.

The GIRI reviewed the declarations and requested further information due to a lack of evidence of appropriate staff completing the declarations. The GIRI requested additional samples of declarations made by senior management and integrity-related personnel.

GRSA subsequently submitted Integrity Declarations Committee (IDC) Minutes from a meeting held in January 2026 (The IDC consists of key members of the GRSA Executive Leadership Team). The IDC Minutes reported the review of seven staff declarations.

GRSA re-submitted the declarations for GIRI review.

The GIRI reviewed the declarations which either required management review, or where there was nothing to declare.

The GIRI ensured all required staff had completed a private interests declaration and complied with the requirements of the policy.

The GIRI verified this recommendation as complete.

RECOMMENDATION 11 – COMPLETED

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.

CONTEXT

Recommendation 11 can be read in conjunction with Recommendations 9 and 10. GRSA consider these three Recommendations as its new Integrity Framework.

The Ashton Report noted “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... contains a section on “Gifts, Hospitality and Other Benefits.”

However, the Ashton Report has recommended GRSA implement a specific Gifts and Benefits Policy.

Further context regarding this recommendation is included on page 40 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

22 October 2025

VERIFICATION PROCESS

GRSA submitted the new ‘Gifts and Benefits Policy (Employees and Contractors)’. GRSA also submitted the Board approval of the new policy.

GRSA submitted a Register of staff declarations of gifts, benefits and hospitality.

GRSA provided evidence of staff acknowledgements of their requirements under the new policy.

The GIRI verified the new policy as having met the requirements listed within the recommendation. The GIRI also noted staff declarations required by the policy, staff acknowledgements and the Board approval of the policy.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested GRSA provide current staff declarations under the ‘Gifts and Benefits Policy (Employees and Contractors)’ to ensure ongoing declarations.

GRSA provided the updated Register and advised it is periodically reviewed by executive management. The GIRI noted there had been one gift disclosed in the 2025/26 financial year.

The GIRI confirmed the Register was still being maintained and reviewed by GRSA as of July 2026.

RECOMMENDATION 12 – COMPLETED

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

CONTEXT

The 2017 McGrathNicol report made the following recommendations in relation to on-track veterinarians (OTVs):

- Develop a process to document the role of the veterinarian at race meetings.

The Ashton Report “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).”

The Ashton Report recommended that GRSA create a similar folder.

Further context regarding this recommendation is included on pages 40 and 41 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

26 June 2025

VERIFICATION PROCESS

GRSA provided a copy of its OTV folder titled the ‘GRSA Guide for On-Track Veterinarians’. GRSA advised its OTV folder was drafted by the veterinarian that created the GRV On-Track Veterinary Education Folder. The draft was subsequently reviewed in consultation with key GRSA stakeholders including OTVs and senior management across the organisation (stewards, animal welfare, legal and operations staff).

GRSA also submitted Board Minutes evidencing its Board approval of the OTV folder.

The GIRI reviewed the GRSA OTV folder for comparison with the Ashton Report’s suggested elements and, while the GIRI agreed with the content of the folder, the GIRI requested evidence of communication and dissemination of the folder to GRSA OTVs.

GRSA subsequently provided an Agenda and video of proceedings of an OTV folder induction meeting held in June 2025. GRSA advised that this video recording would also be used to inform future OTVs.

GRSA provided copies of emails sent to all OTVs with a digital copy of the OTV folder attached and a video recording and transcript of the induction meeting.

The GIRI then requested additional information regarding the onboarding process for new OTVs and their understanding of the OTV folder.

GRSA subsequently advised the GIRI that new OTVs that are engaged by GRSA will also be provided with a personal induction from the author of the OTV folder and supported in-person at race meetings by an experienced OTV until competency levels are assured.

GRSA further advised that all OTVs have been provided with both physical and digital copies of the folder. In addition, a physical copy of the folder is located in the stewards’ room at each racetrack. Digital copies of the folder are also available on a laptop located in each stewards’ room.

The GIRI reviewed the information provided and verified this recommendation as complete.

REVISIT OF RECOMMENDATION

The GIRI observed the location of the OTV folder while attending race meetings at Gawler, Angle Park, Mount Gambier and Murray Bridge in May and June 2026.

RECOMMENDATION 13 – COMPLETED

GRSA finalise its documentation of all swabbing and sampling procedures.

CONTEXT

This recommendation should be read in conjunction with Recommendation 14.

Swabbing is defined by the NSW Greyhound Welfare and Integrity Commission (GWIC) as “...the collection of a biological sample from a registered greyhound for the purpose of detecting the presence of a prohibited substance...”

The term swabbing can be used interchangeably with sampling or testing and includes the collection of blood, hair or urine.

The Ashton Report noted 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. 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 had not been finalised.”

Further context regarding this recommendation is included on page 41 and 42 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

24 June 2025

VERIFICATION PROCESS

GRSA submitted a copy of the finalised ‘Prohibited Substance Sample Program’ document. GRSA submitted a Board Circular Resolution providing Board approval of the Program.

The GIRI reviewed the finalised Program and confirmed the content includes all the elements detailed on pages 41 and 42 of the Ashton Report. The GIRI noted the Board’s approval of the program.

The GIRI verified this recommendation as complete.

RECOMMENDATION 14 – COMPLETED

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.

CONTEXT

For the purpose of this recommendation, a suspension is a penalty of a period of time during which an industry participant loses their rights and privileges. A suspended suspension means the suspension does not take effect if the industry participant complies with conditions set by GRSA or the stewards.

Recommendation 10 was one of a number of recommendations arising from the 2017 McGrathNicol report that were not implemented. The Ashton Report noted McGrathNicol found “...there is no documented process for the taking of out of competition samples, or a policy governing an effective program.”

This recommendation should be read in conjunction with Recommendation 13.

Further context regarding this recommendation is included on page 41 and 42 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

3 July 2025

VERIFICATION PROCESS

GRSA submitted its ‘Prohibited Substance Sampling Program’ document.

GRSA submitted communication from the General Manager, Risk and Compliance to the Chief Executive Officer (CEO) summarising the Program and detailing the targeting of participants serving suspended suspensions. This communication was endorsed by the CEO. At this time the CEO had also assumed the responsibilities of General Manager, Welfare.

GRSA submitted a list of suspended trainers who had been targeted and tested and a list of suspended trainers who will be targeted and tested.

The GIRI reviewed these documents and confirmed they met the requirements of the recommendation. The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested a current list of targeted participants. GRSA submitted an updated list currently being used. This list contained all participants that had been subject to suspended suspensions since the original verification date of 3 July 2025 and the number of samples that had been taken in that time.

RECOMMENDATION 15 – COMPLETED

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 autogenerate an appropriate acknowledgement from GRSA with details regarding timeframes for consideration of the same and when a response can be expected.

CONTEXT

This recommendation should be read in conjunction with Recommendation 16 and Recommendation GRSA 9 regarding complaint handling.

The Ashton Report advised “...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...”

Further context regarding this recommendation is included on pages 42, 43 and 44 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

13 February 2025

VERIFICATION PROCESS

GRSA advised the GIRI that the ‘Contact GRSA’ webpage had been updated to align with the recommendation.

The GIRI accessed the ‘Contact GRSA’ page on the GRSA website and submitted mock enquiries.

The GIRI reviewed the updated webpage and noted parts of the recommendation had not been actioned:

- The ‘Contact GRSA’ button was not in a prominent place within the navigation bar.
- GRSA needed to be clearer with the categories under which one can report a concern, as prescribed in the recommendation.
- There was no separate form to submit a media enquiry.
- The former platform (KnowTellProtect) was still referenced throughout the GRSA website and contact process.
- Other grammatical errors.

GRSA subsequently submitted the December 2024 edition of Kennel Capers to show communication to the industry of the new complaint handling processes, procedures and contact options.

GRSA submitted Minutes from the December 2024 Board meeting evidencing Board approval of the implementation of the new complaints handling process and communication to industry.

GRSA advised the GIRI that the ‘Contact GRSA’ webpage had been updated to reflect the discrepancies noted.

The GIRI accessed the ‘Contact GRSA’ webpage and submitted mock enquiries through each separate form as prescribed in the recommendation:

- Reporting animal welfare concerns, suspicious behaviour or other unlawful conduct
- Making a complaint or providing feedback about GRSA and its staff
- Submitting a media enquiry
- Submitting a general enquiry

The GIRI confirmed each form was appropriately titled and generated an auto-acknowledgement which contained timeframes for a response from GRSA.

The GIRI noted the Board approval and communication to the industry and approved the updated website.

The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In July 2026 the GIRI re-accessed the ‘Contact GRSA’ webpage and confirmed all information was still presented correctly.

RECOMMENDATION 16 – NOT COMPLETED

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.

CONTEXT

This recommendation should be read in conjunction with Recommendation 15 and Recommendation GRSA 9 regarding complaint handling.

The Ashton Report advised the 2017 McGrathNicol report “...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 recommended 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).”

Further context regarding this recommendation is included on pages 42, 43 and 44 of the Ashton Report.

ORIGINAL RECOMMENDATION VERIFICATION DATE

14 January 2025

VERIFICATION PROCESS

GRSA submitted the new Standard Operating Procedure (SOP) – ‘Greyhound Health and Welfare Complaint Handling’ document.

GRSA submitted the December 2024 edition of Kennel Capers to show communication to the industry of the new complaint handling processes and procedures.

GRSA submitted Minutes from the December 2024 Board meeting evidencing Board approval of the implementation of the new complaints handling process and communication to industry.

The GIRI noted these documents and confirmed the SOP contained all elements as required including the following - “All Urgent Complaints and Complaint Determinations must be tabled as an agenda item at the next relevant IWC meeting and Board meeting”.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested GRSA provide copies of all IWC Minutes since the recommendation verification date to ensure the process continued to be followed where complaints were discussed at IWC meetings.

GRSA provided copies of Minutes from the nine IWC meetings held between 10 October 2024 and 16 April 2026.

GRSA advised it is “preparing a report on complaints and notifications received during FY 2026, including the relevant partial period prior to that year, for tabling at the July 2026 Integrity and Welfare Committee meeting.”

From reviewing the IWC Minutes from the nine meetings, the GIRI found only one instance of an Agenda item regarding animal welfare and other unlawful conduct complaints.

COMMENTARY

From the June 2026 revisit of the recommendation, the GIRI found there was insufficient evidence that complaints regarding animal welfare or other unlawful conduct were discussed at IWC meetings (as outlined in the SOP and the recommendation).

On review, the GIRI is no longer satisfied that the actions required by this recommendation are still occurring. Accordingly, this recommendation is not considered endorsed as completed.

RECOMMENDATION 17 – COMPLETED

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

CONTEXT

This recommendation should be read in conjunction with Recommendation 29. It is noted that the newly appointed analyst fulfils the requirements of both Recommendation 17 and Recommendation 29.

The Ashton Report noted “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.”

Further context regarding this recommendation is included on page 47 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

14 May 2026

VERIFICATION PROCESS

GRSA initially proposed that stewards could fulfil the duties of a betting analyst. This approach was not supported by the GIRI.

GRSA submitted a Position Description (PD) for the role of Intelligence and Betting Analyst and a Board Paper approving the PD for the GIRI’s consideration.

The GIRI noted the following anomalies from the submission:

- The wording of Recommendation 17 differed from that contained in the Ashton Report, referring to enhanced monitoring and analysis of betting markets rather than the employment of an analyst.
- The PD did not address the key elements of the recommendation (e.g. providing intelligence to stewards on integrity issues identified through betting patterns).
- There was no demonstration of the type of work conducted by the new employee.
- There was no evidence of capabilities of the new employee.

The GIRI requested that GRSA review and then re-submit these documents.

GRSA subsequently submitted an updated PD for the new role, a signed Employment Agreement for the new appointment (commencing 29 January 2026) and a portfolio of documents prepared by the analyst demonstrating the required capability.

The GIRI noted the revised submission contained the correct wording of Recommendation 17.

The GIRI verified the recommendation as complete.

RECOMMENDATION 18 – COMPLETED

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

CONTEXT

The Greyhounds Australasia Rules classify lay betting as offering or placing of a bet on a greyhound to lose a race, or be beaten by another, or by a margin, or not be placed. (GAR 166 [1])

For integrity purposes, lay betting can create a heightened risk for manipulation.

Further context regarding this recommendation is included on page 47 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

24 June 2025

VERIFICATION PROCESS

GRSA submitted a Steward's Notice of proposed Local Rule 47A seeking feedback from the industry. In relation to lay betting, the rule (in part) stated:

47A Fairness in Greyhound Racing

(3) A person, being a trainer, will be guilty of an offence if the person:

- (a) places a bet on a greyhound, other than a greyhound trained by that person, in a race in which they have a starter;*
- (b) places any type bet on a greyhound, other than a greyhound trained by that persons, in a race to finish ahead of a greyhound they train in the race;*
- (c) has a bet placed on their behalf on a greyhound in a race to finish ahead of their own greyhound; or*
- (d) receives any benefit in any way connected with the laying of their greyhound by another person.*

GRSA submitted a Board Paper detailing the new rule and Minutes showing Board approval.

GRSA submitted the 2022 Local Rules (Reprint 7A) dated 11 October 2024 showing the updated Local Rule 47A (page 20).

GRSA submitted the November 2024 issue of Kennel Capers communicating the updated Local Rule to the industry.

The GIRI reviewed the documentation submitted and advised GRSA that the proposed rule does not appear to prohibit all participants from lay betting in any greyhound race in South Australia, but only trainers who have a greyhound in that race.

Ongoing correspondence occurred between the GIRI and GRSA regarding the proposed wording of the amended Local Rule 47A.

GRSA subsequently submitted Board Minutes from the April 2025 meeting showing approval of the amended Local Rule 47A.

In May 2025 the GIRI accepted that the updated proposed Rule 47A met the requirements of the recommendation. The updated wording of Local Rule 47A reads:

47A Lay betting

In this rule: “Lay” has the same meaning as R166 of the Greyhounds Australasia Rules; “Participant” means a registered person under the Rules. An offence is committed if any participant lays any greyhound in any race in South Australia.

Greyhounds Australasia Rule 166 states:

166 Prohibited lay betting

(1) For the purposes of this rule “lay” means the offering or placing of a bet:

- (a) on a greyhound to lose an Event;*
- (b) on a greyhound to be beaten by any other runner or runners in an Event, other than a bet on multiple runners of a type which will generate a dividend if all elements of that bet type are satisfied; [Note: two examples of this type of bet include an exacta bet where the bet is on a greyhound finishing second, and a trifecta bet where the bet is on a greyhound finishing second or third.]*
- (c) on a greyhound to be beaten by any margin or range of margins in an Event;*
- (d) on a greyhound that it will not be placed in any one of the first four finishing placings in an Event; or*
- (e) on all greyhounds in a race in any bet type to the exclusion of a greyhound trained or owned by a person.*

The GIRI requested evidence of implementation of industry communication of Rule 47A from GRSA.

GRSA subsequently submitted an updated copy of the 2022 Local Rules (Reprint 7A) dated 18 June 2025 showing the updated Local Rule 47A.

GRSA submitted the May 2025 issue of Kennel Capers communicating the amended Local Rule to the industry.

The GIRI reviewed the additional documentation and considered this satisfactory evidence of communicating the implementation of Local Rule 47A to the industry.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

The GIRI notes that, since the verification of this recommendation, GRSA has employed an Intelligence and Betting Analyst. Duties of the Analyst include:

- Prepare and provide pre- and post-race intelligence reports to stewards.
- Produce intelligence outputs to support steward investigations and decision-making.
- Monitoring betting fluctuations, volumes, and behaviours to detect suspicious wagering activity.
- Analysing betting markets and wagering activity to identify irregular patterns, anomalies, and potential integrity risks.

RECOMMENDATION 19 – COMPLETED

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.

CONTEXT

The Ashton Report noted that “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.”

“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.”

Further context regarding this recommendation is included on page 48 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

4 June 2026

VERIFICATION PROCESS

GRSA submitted a completed workforce review of stewarding staffing levels. This included a consultation paper for stewarding staff and options for current stewards to provide written responses or attend one-on-one discussions, group discussions or team meetings.

GRSA also submitted a ‘Stewarding Workforce Consultation and FTE Determination’ paper advising all four tracks were assessed, optimum staffing numbers had been determined and detailed the methodology used to conduct the review.

GRSA submitted a ‘Steward Workforce Consultation – Executive Summary of Feedback Findings’ paper which advised of feedback obtained from stewards.

The GIRI reviewed the documentation and requested further information, including stewarding staffing levels at the time of the Ashton Review, in order to compare with the latest workforce review.

GRSA subsequently submitted this information.

GRSA also submitted an updated organisational chart.

The GIRI was able to confirm the following:

- Stewarding staffing levels had increased when compared to the time of the Ashton Review.
- Stewards’ duties have been redefined since the Ashton Review to focus on raceday duties and not ancillary duties.
- Stewards are now supported by additional staff i.e. an investigative steward and an intelligence analyst.

The GIRI verified the recommendation as complete.

RECOMMENDATION 20 – COMPLETED

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

CONTEXT

The Ashton Report 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.”

Further context regarding this recommendation is included on page 48 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 July 2025

VERIFICATION PROCESS

GRSA submitted the April 2025 Board Paper approving the introduction of a Race Day Operations Manager, an additional responsibility for an existing staff member to be available to participants at each race meeting.

GRSA submitted communications from each steward providing feedback on approaches they receive at race meetings from industry participants on matters outside of their stewarding duties. This advice would inform the responsibilities that would be conferred on the Race Day Operations Manager.

GRSA submitted an example of an updated Club Manager Position Description which includes the Race Day Operations Manager responsibility as part of their role.

GRSA submitted photos of ID badges to be worn by Race Day Operations Managers identifying them to race day participants.

GRSA submitted photos of iPads located at each racetrack. The iPad shows a screen which includes the date, steward in charge, other stewards on duty and the name and mobile phone number of the Race Day Operations Manager on duty.

GRSA submitted evidence of communications (text message, Facebook post) to industry participants regarding the responsibilities of the Race Day Operations Manager.

The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

The GIRI conducted subsequent site visits in May and June 2026 to race meetings held at Gawler, Angle Park, Mount Gambier and Murray Bridge. The visits confirmed the existence of the iPad and the presence of the Race Day Operations Manager. Examples of iPads at racetracks are included below.



RECOMMENDATION 21 – COMPLETED

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

CONTEXT

The Ashton Report noted “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.”

Further context regarding this recommendation is included on page 48 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

10 December 2024

VERIFICATION PROCESS

GRSA submitted November 2024 Board approval of the implementation of the updated Stewards Report process.

GRSA submitted copies of Stewards Reports from before and after the recommendation's implementation of the new process.

The GIRI inspected several publicly available Stewards Reports from before and after the implementation of the recommendation to ensure adherence to the recommendation's requirements. The GIRI confirmed the recommendation had been followed.

The GIRI requested GRSA provide evidence of official instructions or directions provided to all stewards regarding this new process.

GRSA subsequently submitted communications that had been made to stewards reminding them of the new requirements.

GRSA submitted a communication from the Chief Steward to the GM Risk and Compliance advising all stewards had been informed of their responsibilities under the recommendation.

The GIRI noted the further documentation and verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In July 2026 a review was conducted by examining a random sample of Stewards Reports since initial verification to ensure ongoing compliance with the recommendation. The examination confirmed that GRSA had continued to adhere to the requirements of Recommendation 21.

COMMENTARY

It is noted that video replays are not attached to Stewards Reports in instances where a dog has been euthanised due to race injuries.

RECOMMENDATION 22 – COMPLETED

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.

CONTEXT

This recommendation should be read in conjunction with Recommendation 23.

The Ashton Report noted “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.”

Further context regarding this recommendation is included on page 49 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 July 2025

VERIFICATION PROCESS

GRSA submitted a sampling analysis (2023-2025) of out-of-competition and hair testing by month, including a trend analysis, progress against 2025 targets and recommendations for future testing.

GRSA submitted the ‘Prohibited Substance Sample Program.’ The GIRI noted Appendix C outlined the process for intelligence-based sampling and Appendix D which related to hair sampling.

It is important to note that these documents are not for public release.

The GIRI confirmed analysis showed testing had increased year-on-year from 2023 to 2024 to 2025. Hair testing analysis showed tests had increased year-on-year from 2023 to 2024 to 2025.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested an update on the current frequency of hair testing. GRSA submitted 2026 figures which showed a continued increase in hair testing.

RECOMMENDATION 23 – COMPLETED

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

CONTEXT

This recommendation should be read in conjunction with Recommendation 22.

The Ashton Report noted that "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."

This recommendation was assessed for three elements:

- Trend analysis of positive swabs
- Use of analysis to inform future targeted testing
- Use of analysis to inform industry education.

Further context regarding this recommendation is included on page 49 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

15 June 2026

VERIFICATION PROCESS

GRSA submitted the 'Prohibited Substance Sample Program.'

GRSA submitted an update to the IWC Charter assigning responsibility to the IWC for monitoring effectiveness of the 'Prohibited Substance Sample Program' and swabbing outcomes.

GRSA submitted an IWC paper providing an analysis of positive swab data and proposing the rollout of an Integrity Education Pack to industry participants.

The GIRI noted this documentation and asked for further information regarding:

- The data from which the analysis was conducted and trends identified (e.g. dates, names of participants/ greyhounds, location of tests, results of tests, prohibited substances identified)
- How this information has been provided to stewards
- How this information has been used by stewards for targeted testing
- How and when the rollout of the Integrity Education Pack will occur.

GRSA subsequently submitted swab data for the 2024/25 financial year and quarterly swab reports from July 2025 to March 2026.

GRSA submitted the ‘Intelligence Report – Swab Insights and Recommendations’ document, an intelligence report compiled by the new Betting and Intelligence Analyst.

The GIRI noted the first requirement of this recommendation (the analysis of positive swabs) and part of the second requirement (provision of trend data to stewards) had been completed, however, some requirements from the recommendation were still outstanding.

The GIRI requested GRSA provide evidence of how the information in the intelligence report has been communicated to the stewards or any instances where they have used the information to inform their testing. The GIRI also requested GRSA provide information on how the analysis and data has been used for industry education.

GRSA subsequently submitted the April 2026 edition of Kennel Capers which contained communication to industry participants regarding prohibited substances and contamination risks.

GRSA submitted communication to stewards from the GM Integrity and Welfare providing an update on the swabbing analysis results and an amended approach to swabbing protocols for the targeting of greyhounds and/or trainers.

The GIRI was then satisfied with the level of detail presented. The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI examined IWC Minutes and confirmed the analysis of swab data remains a standing item.

RECOMMENDATION 24 – COMPLETED

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

CONTEXT

Recommendation 24 should be read in conjunction with Recommendation 25.6.

The Ashton Report noted “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. There is both a transparency need, and injury reduction need for GRSA to publish the same injury data and analysis as GWIC.”

The GIRI reviewed the ‘Analysis of Greyhound Racing Injuries’ quarterly reports prepared by GWIC and published on its website to inform what needed to be included in the GRSA reports.

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

11 March 2025

VERIFICATION PROCESS

GRSA submitted draft injury data reporting for the quarter of October – December 2024.

The GIRI reviewed the reporting and advised GRSA it contained all elements that GWIC reported on except for one; the percentage of injuries against the actual number of dogs racing. The GRSA draft report only recorded the number of injuries against starts. This is a slightly different statistic as one dog can have a number of starts.

GRSA provided an amended draft report with the inclusion of injury data against the actual number of dogs and also relevant percentages of dogs injured against dogs raced.

The GIRI advised GRSA that, while the injury reporting met the requirements of the recommendation, Recommendation 24 also required that the analysis be published “...to the community.” The GIRI requested advice from GRSA on when it would be published.

GRSA subsequently advised the GIRI that an ‘Injury Report’ page had been created and added to the GRSA website, and that the most recent quarterly report had been uploaded.

The GIRI visited the ‘Injury Report’ page on the GRSA website and was able to access the quarterly report.

The GIRI verified the recommendation as complete.

REVISIT OF VERIFICATION

In July 2026 the GIRI revisited the GRSA website and ensured that the reports had continued to have been published and contained all the required information. The reports remained publicly accessible through the GRSA website.

RECOMMENDATION 25.1 – COMPLETED

GRSA implement the following track safety initiatives:

1. Preferential dox (*sic*) draws based on GPS data.

CONTEXT

It appears a typographical error was made in the Ashton Report and it is accepted that ‘dox draws’ refers to ‘box draws.’

Recommendation 25.1 is the first of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

A Preferential Box Draw (PBD) is a method in which greyhounds are allocated starting boxes based on their established racing traits. It is hypothesised that this method can lead to lower injury rates as collisions and interferences are reduced at the start of the race and dogs are able to race according to their recognised running patterns.

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

16 June 2026

VERIFICATION PROCESS

GRSA submitted a racing calendar for all tracks covering June and July 2026 identifying PBD races at Gawler, Angle Park and Murray Bridge.

GRSA submitted the ‘Preferential Box Draw Policy.’ The policy refers to the IsoLynx camera system providing tracking data used to determine each greyhound’s unique Early Racing Traits (ERTs). ERTs encompass the running pattern of a greyhound at the start and in the initial phase of a race.

GRSA submitted a spreadsheet listing 856 greyhounds, their individual ERT classification for various race distances, an analysis of the ERTs and alignment to a PBD.

GRSA submitted communication to the industry published in the June 2026 edition of Kennel Capers regarding the new PBD Policy.

The GIRI accessed the GRSA website and witnessed a Media Statement titled ‘GRSA to introduce Preferential Box Draws By Data’.

The GIRI noted this information and requested further details on the locations of all IsoLynx cameras at the four tracks and an explanation as to why Mount Gambier was not included in the PBD racing calendar provided for June and July 2026.

GRSA subsequently submitted a series of photos and maps showing the location of the IsoLynx cameras at the four tracks.

GRSA submitted a racing calendar for all tracks for August 2026 identifying PBD races.

The GIRI observed the IsoLynx cameras in-person during attendance at race meetings at Gawler, Angle Park, Murray Bridge and Mount Gambier in May and June 2026. GRSA provided an in-person demonstration of the IsoLynx system.

Following receipt of this additional information the GIRI verified this recommendation as complete. A photo of an IsoLynx camera at the Murray Bridge racetrack is adjacent.



RECOMMENDATION 25.2 – COMPLETED

GRSA implement the following track safety initiatives:

2. Use of double arm lures.

CONTEXT

Recommendation 25.2 is the second of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

A lure is an artificial object attached to a mechanical arm or cable system that is used to stay in front of a greyhound's line of vision, to incentivise them to chase. A double arm lure has two lures attached (see photos below of double arm lures at Angle Park and Mount Gambier). GWIC advises the purpose of a double arm lure is to prevent greyhounds bunching together as they pursue the lure. Instead, the greyhounds can spread out as they pursue two lures travelling at the same speed and distance from them.

Further context regarding this recommendation is included on page 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

23 March 2026

VERIFICATION PROCESS

GRSA submitted photographs of the double arm lure in use at each of the four racetracks and advised that all race meetings had been using the double arm lures since 26 January 2026.

The GIRI viewed randomly selected video replays of races held at all tracks and observed usage of the double arm lure in all races held at Angle Park and Gawler, but only in some races at Mount Gambier or Murray Bridge.

The GIRI requested further information from GRSA regarding the double arm lure not being used in all races held at Mount Gambier and Murray Bridge.

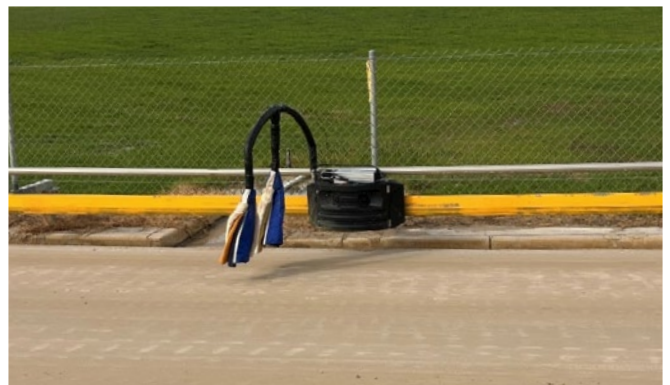
In a subsequent submission, GRSA advised the double arm lures are now in use for all races at Mount Gambier since 12 February 2026 and at Murray Bridge since 10 March 2026. GRSA also submitted additional photos of the double arm lures in use at Murray Bridge.

The GIRI reviewed a further random sample of race replays conducted at both Murray Bridge and Mount Gambier to confirm the use of double arm lures at Mount Gambier from 12 February 2026 and at Murray Bridge from 10 March 2026 as reported by GRSA.

The GIRI was able to confirm the double arm lure was in use at all race tracks and verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In May and June 2026, the GIRI witnessed the continued use of double arm lures at race meets at the four racetracks.



RECOMMENDATION 25.3 – COMPLETED

GRSA implement the following track safety initiatives:

3. Increase in the number of 6 dog races.

CONTEXT

Recommendation 25.3 is the third of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

In comparison to standard eight-dog races, six-dog races are considered to be safer due to the smaller field size resulting in reduced risk of collision between greyhounds.

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

23 May 2025

VERIFICATION PROCESS

GRSA submitted an extract from its April 2025 Board Minutes approving the increase of six-dog fields in both number and as a percentage of overall races.

GRSA submitted a spreadsheet conducting data analysis of the number of six-dog races conducted in the past 18 months.

The GRII conducted a random sample analysis of field sizes to confirm the validity of the data provided.

By reviewing the spreadsheet, the GRII confirmed the number of six-dog fields had continually increased over the 18 months as had the percentage of six-dog races.

The GRII verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GRII requested GRSA provide the statistics of six-dog races held between the initial recommendation verification date of May 2025 and June 2026.

GRSA provided quarterly analyses conducted from April 2025 to June 2026 of average field sizes, the number of races held with six dogs or less and the percentage of races conducted with six dogs or less. The updated quarterly analyses confirmed the increase in six-dog and six-dog-or-less races.

RECOMMENDATION 25.4 – COMPLETED

GRSA implement the following track safety initiatives:

4. Continued development of or acquire an off the shelf consistent measuring tool for establishing the safest surface density.

CONTEXT

Recommendation 25.4 is the fourth of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

The Ashton Report found that racing on softer track surfaces can significantly reduce on-track injuries. The use of a surface density measuring tool informs track staff of the condition of the track in their preparation for a race meeting.

Further context regarding this recommendation is included on pages 7, 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 October 2025

VERIFICATION PROCESS

GRSA submitted a 'Comparative Track Diagnostic Summary' report for each of the five tracks (Gawler, Angle Park, Mount Gambier, Murray Bridge and Murray Bridge Straight) showing the results of water content and surface density tests.

GRSA submitted a Board Paper advising of the purchase of four sets of two measuring tools to be based at each of the four tracks – the Going Stick to measure firmness and strength of the racing surface and the Time-Domain Reflectometry (TDR) tool to measure water content of the racetrack. The Board Paper also advised track staff had undergone training on the utilisation of these tools.

The GIRI requested GRSA provide the following:

- Evidence of purchase of the four sets of measuring tools
- Evidence of training by track staff
- Additional information as to when the equipment was first used and how often it will be utilised

GRSA subsequently submitted tax invoices and receipts evidencing purchase of the Going Stick, TDR and TDR subscription fees.

GRSA submitted a report from the GRSA Racing Safety and Facilities Manager which advised the frequency of use of the tools and the date the tools were first used.

GRSA submitted the 'Integrated Track Management Program' document which educates track curators on providing consistent track surfaces.

The GIRI verified the recommendation as complete.

REVIST OF RECOMMENDATION

In May and June 2026, the GIRI visited the four racetracks and observed demonstrations of the Going Stick and TDR being used (see photos below).



RECOMMENDATION 25.5 – COMPLETED

GRSA implement the following track safety initiatives:

5. Increase in straight track racing.

CONTEXT

Recommendation 25.5 is the fifth of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

The Ashton Report noted “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.”

South Australia has one dedicated straight track facility at Murray Bridge. The GIRI has conducted site visits to this racetrack multiple times.

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

23 February 2026

VERIFICATION PROCESS

GRSA submitted information regarding:

- An increase in straight track prize money
- An increase in one-turn race meetings at Murray Bridge.
- An increase in the total number of straight track races between July and November 2025 when compared to the same time period in 2024. It also showed an increase in the average number of straight track races per week.

The GIRI requested source data from which the information submitted had been derived and advice on GRSA's plans to further increase straight track racing at Murray Bridge.

GRSA subsequently submitted updated data to 30 November 2025 sourced from OzChase, the national online greyhound racing portal which provides state-specific racing data.

The GIRI conducted a sample analysis on the data provided by GRSA to verify the accuracy of the number of straight track races.

GRSA subsequently provided information on future plans to further increase straight track racing at Murray Bridge.

The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

The GIRI requested updated straight track racing figures from the initial recommendation verification date to June 2026.

GRSA submitted this information from March to June 2026 and the GIRI was able to confirm straight track racing numbers per week had continued to increase.

RECOMMENDATION 25.6 – COMPLETED

GRSA implement the following track safety initiatives:

6. Establishment of GWIC style quarterly racetrack injury report.

CONTEXT

Recommendation 25.6 is the sixth of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

Recommendation 25.6 should be read in conjunction with Recommendation 24.

The Ashton Report noted “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.”

“There is both a transparency need, and injury reduction need for GRSA to publish the same injury data and analysis as GWIC.”

The GIRI reviewed the ‘Analysis of Greyhound Racing Injuries’ quarterly reports prepared by GWIC and published on its website to inform what needed to be included in the GRSA reports.

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

11 March 2025

VERIFICATION PROCESS

GRSA submitted draft injury data reporting for the quarter of October – December 2024.

The GIRI reviewed the reporting and advised GRSA it contained all elements that GWIC reported on except for one; the percentage of injuries against the actual number of dogs racing. The GRSA draft report only recorded the number of injuries against ‘starts’. This is a slightly different statistic as one dog can have a number of starts.

GRSA provided an amended report with the inclusion of injury data against the actual number of dogs and also relevant percentages of dogs injured when compared to dogs raced.

GRSA advised the GIRI that an ‘Injury Report’ page had been created, added to the GRSA website, and that the most recent quarterly report had been uploaded.

The GIRI visited the ‘Injury Report’ page on the GRSA website and was able to access the quarterly report.

The GIRI verified the recommendation as complete.

REVISIT OF VERIFICATION

In July 2026 the GIRI revisited the GRSA website and ensured reports have continued to be published and contain all required information. The reports remain publicly accessible through the GRSA website.

RECOMMENDATION 25.7 – COMPLETED

GRSA implement the following track safety initiatives:

7. Establishment of a race injury Review panel as per the NSW model.

CONTEXT

Recommendation 25.7 is the seventh of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

The Ashton Report recommended GRSA 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.”

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 March 2026

VERIFICATION PROCESS

GRSA submitted a CEO paper providing information regarding the formation of the Racing Safety Working Group (RSWG).

GRSA submitted an extract evidencing its Board’s approval of the creation of the RSWG.

GRSA submitted Minutes from five meetings of the RSWG between October 2024 and July 2025.

GRSA advised the GIRI that the RSWG was formed as a precursor to the establishment of a Race Injury Review Panel (RIRP).

The GIRI advised GRSA the recommendation required additional information for consideration and requested GRSA provide the following:

- A copy of the RSWG Terms of Reference (TOR)
- Information regarding whether the RIRP had been established or when this is proposed to occur.
- Information regarding whether GRSA intends to make the findings of its deliberations public each quarter, as GWIC does.

GRSA submitted the RSWG TOR and advised that the RSWG would be replaced by the RIRP in the immediate future.

GRSA advised quarterly reports of the RSWG findings were being published.

The GIRI requested GRSA provide the following:

- The first report of the RSWG
- A copy of the RIRP TOR
- Minutes of the first RIRP meeting
- A copy of RIRP deliberations to be published with the October to December 2025 injury data

GRSA subsequently submitted Minutes from the December 2025 RSWG meeting showing the transition process from the RSWG to the RIRP.

GRSA submitted the RIRP TOR.

GRSA submitted Minutes from the first RIRP meeting.

GRSA submitted the RIRP deliberations to be published with the October to December 2025 injury data.

The GIRI reviewed the RIRP TOR and found it was consistent with the NSW model.

The GIRI requested to be advised once the RIRP deliberations were published within the quarterly injury report.

GRSA subsequently advised it had published the deliberations within the quarterly injury report on the GRSA website under the 'Integrity and Welfare' section.

The GIRI accessed the quarterly report on the GRSA website and verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In July 2026 the GIRI accessed the publicly available quarterly injury reports on the GRSA website and ensured the RIRP analysis remains published as part of the report.

RECOMMENDATION 25.8 – COMPLETED

GRSA implement the following track safety initiatives:

8. Injury analysis to include injury by greyhound trainer.

CONTEXT

Recommendation 25.8 is the eighth of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

Recommendation 25.8 should be read in conjunction with Recommendation 25.9.

“Injury by greyhound trainer” refers to injury data sorted on a per trainer basis.

The Ashton Report noted it has “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.”

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

3 October 2025

VERIFICATION PROCESS

GRSA submitted trainer injury-based data from January 2024 to June 2025. The spreadsheet contained comprehensive injury data and analysis regarding trainers including:

- number of runners.
- number of injuries.
- percentage of injuries against overall runners.
- category of injury.
- all details regarding the injury, race and race meeting.

The GIRI reviewed the data and analysis provided and verified the recommendation as complete.

REVISIT OF RECOMMENDATION

The GIRI requested GRSA provide the data produced from the initial recommendation verification date to June 2026.

GRSA provided updated trainer-based injury data and analysis.

The GIRI was satisfied that this analysis remained ongoing.

RECOMMENDATION 25.9 – COMPLETED

GRSA implement the following track safety initiatives:

- 9. Development of education program for trainers who have a high prevalence of injured greyhounds.**

CONTEXT

Recommendation 25.9 is the ninth of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

Recommendation 25.9 should be read in conjunction with Recommendation 25.8, Recommendation GRSA 1, Recommendation GRSA 15 and Recommendation RSPCA 24.

The Ashton Report noted that it has “been established after analysis that certain trainers have a higher proportion of injured greyhounds...” (Recommendation 25.8). Recommendation 25.9 covers the requirement to provide further education to these trainers.

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

22 June 2026

VERIFICATION PROCESS

GRSA advised of the development and commencement of a trainer education program titled ‘Keeping Your Hound Sound’, overseen by veterinary advisers. GRSA chose to have the program become a requirement for all licenced trainers rather than only trainers with higher rates of injuries. The program will be incorporated into ongoing participant education and licencing renewal processes.

GRSA submitted a copy of the injury prevention training presentation – ‘Preventing, Detecting and Managing Injuries’.

GRSA submitted a list of actions assigned to GRSA management arising from an ‘Injury Minimisation Summit’ conducted by GRSA for industry participants.

GRSA submitted the June 2026 edition of Kennel Capers advising the industry of the new GRSA injury prevention training program and requirements for trainers.

GRSA submitted examples of signage at racetrack venues advising of the requirement for trainers to complete the injury prevention training program and promoting delivery of injury prevention training sessions at four racetracks. The signage included a QR code to access the online modules.

GRSA submitted the completion records of all who participated in the injury prevention training program.

GRSA advised trainers were also able to complete the injury prevention training program through an online portal.

The GIRI accessed the online portal and confirmed its functionality.

The GIRI reviewed the documentation provided and verified the recommendation as complete.

Following verification, GRSA provided the GIRI with an updated spreadsheet of completion of the injury prevention training program by industry participants. GRSA also advised it intends to suspend licensees who have not completed the training by 7 July 2026.

RECOMMENDATION 25.10 – COMPLETED

GRSA implement the following track safety initiatives:

10. Greyhounds returning from long layoffs to be required to be the subject of a veterinary clearance pre-nomination.

CONTEXT

Recommendation 25.10 is the tenth of ten recommendations relating to the implementation of track safety initiatives. For the purpose of this report these partial recommendations (25.1 to 25.10) have been assessed individually, however still form one recommendation.

The Ashton Report advises that “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.”

Further context regarding this recommendation is included on pages 50 and 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

24 September 2025

VERIFICATION PROCESS

GRSA provided a paper submitted to its Board compiled by the GM Risk and Integrity proposing the establishment of a new Local Rule 69B.

GRSA submitted an extract from its August 2025 Board Minutes approving the adoption of Local Rule 69B.

GRSA submitted a screenshot from the GRSA website titled ‘Greyhound Racing SA Rules - Proposed Changes and Amendments’ showing the Local Rule had been posted for consultation by the industry.

GRSA submitted an updated copy of the Local Rules (effective 12 September 2025) including the new Local Rule 69B (see following).

69B Restriction on racing if unraced for 60 days or more (long layoff)

1. A greyhound which has not competed in an Event for 60 days or more (a long layoff) must not be nominated for an Event until:
 - a. It passes an approved examination conducted by a veterinarian; and
 - b. it completes a satisfactory trial in accordance with Rule 132 of the Rules.
2. For the avoidance of doubt, greyhounds returning from long layoffs are required to be the subject of a veterinary clearance pre-nomination, which must certify the greyhound is fit to compete and free from injury, illness, or condition

The GIRI reviewed GWIC rule (R185) which specified that a long layoff was considered six calendar months or more whereas GRSA Local Rule 69B defined a long layoff as 60 days or more.

Upon review of the documentation provided, the GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested a list of all greyhounds that have undergone veterinary clearance prior to returning from a long layoff since the introduction of the Local Rule.

GRSA provided a list of all greyhounds that have successfully trialled and been granted veterinary clearance following a long layoff (60 days or more) detailing the venue they trialled at and successful trial date.

RECOMMENDATION 26 – COMPLETED

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

CONTEXT

The Ashton Report noted the position of starting boxes relative to racetrack turns is an area worthy of analysis to reduce on-track injuries. The Review “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.”

Further context regarding this recommendation is included on page 51 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

3 February 2026

VERIFICATION PROCESS

GRSA submitted a Board Paper containing the analysis of Greyhounds Australasia’s data of South Australian racing injuries. The analysis reported no notable findings of injuries relative to starting box locations.

GRSA submitted an ‘SA Injury Rate Starting Box Location’ data and analysis document for all four tracks in SA. This included the following data points:

- starting box location compared to overall track injury rate
- track starting position compared to hock injury rate analysis
- track starting position compared to gracilis injury rate analysis
- track starting position compared to ulna injury rate analysis

GRSA submitted the source data from 2017 to 2024.

The GIRI conducted his own analysis on the data provided and observed that the analysis did not provide advice on the position of the starting box relative to the corner (i.e. just before the turn, in the middle of the turn, just after the turn) and noted the analysis also did not include:

- how close the boxes are to the turns (in metres)
- which ones start on the straight and how long the dogs race in a straight line before entry to a turn
- sharpness of the turns

The GIRI requested a more comprehensive analysis including the elements listed above and diagrams of starting locations.

GRSA subsequently submitted spreadsheets for all tracks and all distances indicating:

- the distance from the starting boxes to the turns
- identifying which boxes start on the straight
- the distance before the straight becomes a turn.

GRSA also submitted diagrams overlaid on satellite maps of all racetracks showing the above information.

The GIRI requested further information on the following:

- whether GRSA had identified a correlation between box location and injuries.
- the strategy GRSA have in place to reduce injuries arising from starting box location relative to turns.

GRSA subsequently advised that it undertook a further expanded review of injury data for the 2024 and 2025 calendar years.

GRSA submitted a spreadsheet of injury rates compared to starting box location between January 2024 and December 2025 for all distances at all tracks. The analysis identified that races commencing from bend starts exhibit a marginally higher injury rate than those commencing from straight starts. The analysis also observed the Angle Park 342 metre races recorded the highest relative injury rate, for distances with more than 1,000 starters.

Given this correlation, GRSA advised it would be:

- engaging track infrastructure specialists to review starting box geometry;
- repositioning the starting boxes closer to the outside rail to improve greyhound running angles into the first turn;
- adjusting lure operation to allow greater lead distance at box release, reducing convergence pressure approaching the turn; and
- establishing an Injury Minimisation Summit.

The GIRI reviewed the information received, noting the identification of the correlation and the works planned, and verified the recommendation as complete.

RECOMMENDATION 27 – COMPLETED

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

CONTEXT

A greyhound trial is a controlled, timed practice run on a racetrack.

The Ashton Report noted that “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.”

Further context regarding this recommendation is included on page 50 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

14 May 2026

VERIFICATION PROCESS

GRSA submitted injury data reports for December 2025 and January 2026. The reports detailed all injuries to greyhounds at all tracks including those sustained at trials. The reports also list injury categories and incapacitation periods.

GRSA submitted the November 2025 edition of Kennel Capers including a communication advising that injuries to greyhounds during trials now need to be properly recorded and published. GRSA also advised that “trainers and handlers must report all obvious injuries as soon as practicable to the GRSA person in attendance.” The communication also provided the relevant GRSA contact details.

GRSA submitted photos of signage at racetracks advising trainers and handlers of their requirement to report injuries incurred during trials and the location to report the injury at each track.

GRSA submitted a copy of the ‘Trial Injury And Incident Report’ form.

The GIRI requested GRSA resubmit once the trial injury data for all months was included in the published quarterly report.

GRSA subsequently submitted an analysis of greyhound racing injuries for the January – March 2026 quarter including trial injury data and Race Injury Review Panel analysis.

The GIRI visited the GRSA website and confirmed trial injury data was included within the quarterly injury report published online.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In July 2026 the GIRI inspected the most recent quarterly injury report and confirmed trial injury data was still being captured as part of this report.

RECOMMENDATION 28 – COMPLETED

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

CONTEXT

Recommendation 28 should be read in conjunction with Recommendation 29.

At the time of the Ashton Report, GRSA had a capacity of three staff performing welfare inspections, not including the Welfare and Rehoming Manager. The Ashton Report believed that “the number of staff is insufficient for the task” and recommended staffing levels be reviewed.

The Ashton Report observed that there was “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...”

Further context regarding this recommendation is included on page 54 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

4 June 2026

VERIFICATION PROCESS

GRSA submitted a paper titled ‘Welfare Workforce Calculation and FTE Determination’ which outlined the methodology to determine optimum staffing levels. The paper reviewed the number of shifts required to conduct property inspections and undertake non-property inspection duties and provided calculations based on a minimum of three property inspections per annum.

The GIRI conducted an analysis of the paper and requested additional information regarding:

- Current staffing levels
- Staffing levels at the time of the Ashton Review
- Clarification on targeted number of property inspections per year
- Scope for proactive welfare functions

GRSA subsequently advised the operating model had changed to enable a risk-based proactive approach, as follows:

- The welfare team FTEs had increased however, this figure did not reflect the new roles of Betting and Intelligence Analyst, Investigative Steward and Chief Veterinary Adviser, all which provided additional support to the welfare team.
- The Manager Welfare, Compliance and Traceability is now 1FTE increased from 0.5FTE.
- The welfare team now has access to a new Greyhound Traceability System (GTS) and soon a new intelligence and case management system (Clue).
- Welfare staff attending targeted property inspections had reduced from three staff per visit, to two staff per visit.

The GIRI was satisfied the welfare team was now sufficiently resourced to achieve a proactive function and verified this recommendation as complete.

RECOMMENDATION 29 – COMPLETED

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

CONTEXT

Recommendation 29 should be read in conjunction with Recommendation 17 and Recommendation 28. It is noted that the newly appointed GRSA analyst fulfils the requirements of both Recommendation 17 and Recommendation 29.

The Ashton Report observed there was “little capability in the team to be truly proactive when planning inspections. They do not have the services of analytical staff assisting inspection targeting. The welfare team 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.”

Further context regarding this recommendation is included on page 54 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

14 May 2026

VERIFICATION PROCESS

GRSA submitted a Position Description (PD) for the role of Intelligence and Betting Analyst and a Board Paper approving the PD for the GIRI’s consideration.

The GIRI noted the following:

- The wording of GRSA’s submission was to ‘strengthen its intelligence led and proactive investigative capability,’ which differed from the Ashton Report’s wording of Recommendation 29 to engage an analyst.
- The PD did not address the specific requirements of the recommendation (e.g. providing intelligence to enable proactive targeting by the welfare team).
- There was no demonstration of the type of work conducted by the new employee.
- There was no evidence of capabilities of the new employee.

The GIRI requested GRSA resubmit these documents addressing these anomalies.

GRSA subsequently submitted an updated PD for the new role, a signed Employment Agreement for the new appointment (commencing 29 January 2026) and a portfolio of documents prepared by the analyst demonstrating required capability.

Within this portfolio GRSA was able to provide analysis of internal and external data to identify welfare risk indicators, provision of intelligence to support proactive, risk-based inspection planning and support to the welfare team to prioritise compliance and inspection activity.

The GIRI noted the submission contained the correct wording of Recommendation 29.

The GIRI verified the recommendation as complete.

RECOMMENDATION 30 – COMPLETED

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.

CONTEXT

Recommendation 30 should be read in conjunction with Recommendation 38.

The Ashton Report advises that “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 oversight industry reforms.”

Further context regarding this recommendation is included on page 54 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

29 October 2025

VERIFICATION PROCESS

GRSA submitted confirmation of the appointment of a new General Manager Welfare who would transition to the position of General Manager Integrity and Welfare. This new appointee previously held the role of Chief Inspector at RSPCA SA.

GRSA advised the new role would be dual reporting to both the GRSA Board and Executive and the GIRI.

GRSA submitted Board Papers evidencing approval of the dual reporting function of the General Manager Integrity and Welfare.

GRSA submitted a copy of the Position Description for the General Manager Integrity and Welfare.

GRSA submitted an organisational chart showing reporting lines for the General Manager Integrity and Welfare.

GRSA submitted a Letter of Offer email from the CEO to the new General Manager Integrity and Welfare.

The GIRI reviewed the documentation and requested that GRSA provide evidence of how this appointment had been communicated to GRSA staff and the industry.

GRSA subsequently submitted the October 2025 edition of Kennel Capers advising of the dual reporting function of the General Manager Integrity and Welfare role.

GRSA submitted an Agenda from the October 2025 Industry Consultative Group meeting confirming advice to the industry regarding the appointment and dual reporting function.

GRSA submitted a memo sent to GAP staff regarding the appointment and dual reporting function.

GRSA submitted a copy of ‘A Message From The CEO’ memo to GRSA staff advising of the appointment and dual reporting function.

The GIRI has formally met with the General Manager Integrity and Welfare on a monthly basis since the General Manager’s appointment in October 2025. Ad hoc meetings and joint site visits have also been conducted as needed. The GIRI has had a direct line of communication with the General Manager throughout the reporting period, including on matters relating to Recommendation 38.

The GIRI verified the recommendation as complete.

RECOMMENDATION 31 – COMPLETED

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.

CONTEXT

Recommendation 31 should be read in conjunction with Recommendation 32.

GRSA staff regularly undertake welfare inspections at trainers' properties where they complete an inspection report form to document their visit specifying any non-compliant matters.

The Ashton Report noted 14 examples of important information which did not appear as prompts on the inspection form. These include:

- 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?

Further context regarding this recommendation is included on pages 59 and 60 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted the 'Annual Participants Questionnaire' form with questions amended to include the information required by the recommendation.

GRSA also submitted a copy of the 'Full Inspection/Greyhound Audit' form.

The GIRI advised GRSA that he required additional information and requested GRSA provide a copy of the amended 'Full Inspection/Greyhound Audit' form to include the following omitted information:

- Questions related to cleaning
- Questions related to exercise regime
- Questions which allow for more descriptive (text insertion) answers

GRSA subsequently submitted the amended 'Full Inspection/Greyhound Audit' form with the addition of the previously omitted elements listed above.

GRSA also submitted a document highlighting the inclusion of additional information included in the 'Full Inspection/Greyhound Audit' form and a copy of the previous version as a comparison.

GRSA submitted copies of recently completed 'Full Inspection/Greyhound Audit' forms.

The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested that GRSA provide copies of recently completed inspection record forms to ensure they continue to capture inspection history, welfare and overall management information, kennel descriptions and evidence of non-compliant items where required.

GRSA provided a sample of recently completed inspection records evidencing ongoing compliance.

RECOMMENDATION 32 – COMPLETED

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).

CONTEXT

Recommendation 32 should be read in conjunction with Recommendation 31.

GRSA staff regularly undertake welfare inspections at trainers' properties where the staff complete an inspection report form to document their visit specifying any non-compliant matters.

The Ashton Report noted "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."

Further context regarding this recommendation is included on pages 59 and 60 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted the 'Annual Participants Questionnaire' form with questions amended to include the information required by the recommendation.

GRSA also submitted a copy of the 'Full Inspection/Greyhound Audit' form.

The GIRI advised GRSA that he required additional information and requested that GRSA provide a copy of the amended 'Full Inspection/Greyhound Audit' form to include the following omitted information:

- How many dogs are registered to the participant prior to the audit
- How many dogs were located at the premises
- Explanation field for any discrepancies

GRSA subsequently submitted the amended 'Full Inspection/Greyhound Audit' form with the addition of the previously omitted elements listed above.

GRSA also submitted a document highlighting the inclusion of additional information included in the 'Full Inspection/Greyhound Audit' form and a copy of the previous version as a comparison.

GRSA submitted copies of recently completed 'Full Inspection/Greyhound Audit' forms.

The GIRI verified the recommendation as complete.

RECOMMENDATION 33 – COMPLETED

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.

CONTEXT

Recommendation 33 is a recommendation for which the Government is responsible.

Recommendation 33 should be read in conjunction with Recommendation RSPCA 19.

Recommendation 33 has alignment with the requirements of Recommendation 34 and Recommendation 36.

The Ashton Report notes “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 Ashton Report recommended “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.”

Further context regarding this recommendation is included on pages 78 to 80 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

30 April 2025

VERIFICATION PROCESS

The Minister for Climate, Environment and Water advised that the Department for Environment and Water (DEW) had completed a review of the *Animal Welfare Act 1985* and that the Animal Welfare Bill 2025 (the Bill) had passed through Parliament. The Bill included a provision for mandatory reporting of suspected breaches by GRSA staff and volunteers to the enforcement agency (RSPCA). The relevant part of the Bill is “Section 13 – Special Requirements for Greyhound Racing Entities.”

The new *Animal Welfare Act 2025* will become operational once the corresponding Regulations have been passed. DEW advised work is currently being undertaken to update the Animal Welfare Regulations.

Based on the information provided, the GIRI was able to confirm that the Government had considered the recommendation and actively taken steps to mandate the controlling authority for greyhound racing (GRSA) to report suspected breaches of the *Animal Welfare Act 2025* and Regulations to the RSPCA.

As the recommendation only required consideration, the GIRI verified this recommendation as complete.

RECOMMENDATION 34 – COMPLETED

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.

CONTEXT

Whilst Recommendation 34 was considered the responsibility of GRSA, the RSPCA also had involvement in the implementation of this recommendation.

Recommendation 34 has alignment with the requirements of Recommendation 33, Recommendation 36 and Recommendation RSPCA 19.

The Ashton Report noted “...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.”

The Ashton Report recommended “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.”

Further context regarding this recommendation is included on pages 78 to 80 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

11 May 2026

VERIFICATION PROCESS

GRSA submitted the Agenda from the initial meeting held between the Chief Inspector, RSPCA and General Manager Integrity, GRSA in June 2025 and provided a schedule of future bi-monthly meetings. GRSA advised that, at this point, the General Manager Integrity was fulfilling the duties of the General Manager Welfare and Integrity role.

GRSA submitted an email from the Chief Inspector, RSPCA confirming the meeting had been held, summarising the items discussed and scheduling forthcoming meetings.

The GIRI confirmed the occurrence of the first meeting, however advised this recommendation would not be verified as complete until evidence could be provided that the minimum of six regular meetings had occurred.

GRSA subsequently submitted Agendas and Minutes for meetings held between the Chief Inspector, RSPCA and the General Manager Integrity, GRSA in June 2025, and between the Chief Inspector, RSPCA and the General Manager Integrity and Welfare, GRSA in August 2025, October 2025, December 2025, February 2026 and May 2026.

The GIRI reviewed the documentation provided and verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested Minutes from the seventh meeting held between the Chief Inspector, the RSPCA and the General Manager Integrity and Welfare, GRSA.

GRSA provided these Minutes and the GIRI was able to confirm these meetings are ongoing.

The RSPCA also confirmed seven meetings had been held between the Chief Inspector, RSPCA and the General Manager Integrity and Welfare, GRSA.

The RSPCA advised the meetings were held to ensure information exchange about

- potential welfare issues;
- issues reported to, or investigated by, GRSA; and
- updates from the RSPCA on any issues the RSPCA may have investigated that GRSA had referred to the RSPCA.

RECOMMENDATION 35 – COMPLETED

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

CONTEXT

Recommendation 35 is a recommendation for which the Government is responsible. Whilst Recommendation 35 was considered the responsibility of the Government, the RSPCA also had involvement in the implementation of this recommendation.

The GIRI considered Recommendation 35 to encompass two distinct actions:

- Consideration of funding by the Government, and
- Consideration by the RSPCA to appoint a full-time animal welfare officer dedicated to greyhound welfare.

Further context regarding the RSPCA's role in greyhound welfare is included on pages 78 to 80 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

17 June 2025

VERIFICATION PROCESS

The Minister for Climate, Environment and Water advised that “The Department has a funding agreement with the RSPCA for the provision of the enforcement function of the animal welfare legislation. The government has committed an additional \$16.4 million over the next 4 years to the RSPCA for the enforcement function. This additional funding will provide capacity to the RSPCA to be able to follow up animal welfare complaints in relation to greyhound welfare as part of its general inspectorate operations.”

The RSPCA advised the GIRI that it does not plan to appoint an Inspector exclusively dedicated to greyhound welfare, however, it was actively increasing inspectorate resources overall to enable more effective workload management, expediting case resolutions and assuring timely prosecutions.

The RSPCA additionally advised it “aims to avoid potential familiarity or complacency that might arise from assigning one inspector solely to greyhound welfare.”

Based on the information provided, the GIRI was able to confirm that both the State Government and the RSPCA had considered the recommendation to allocate funding to appoint a full-time animal welfare officer at the RSPCA dedicated to greyhound welfare.

As the recommendation only required consideration, the GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In April 2026 the GIRI requested that the RSPCA provide a submission on progress of any recommendations for which the RSPCA had responsibility.

In June 2026 RSPCA advised the following in regards to Recommendation 35:

- “Having one person in that role means the person may be influenced by their ongoing contact with participants and employees of the industry.”
- The RSPCA “already investigate issues relating to the welfare of Greyhounds, as we do with all other animal species in South Australia.”
- “There are many industries that would benefit from a full-time animal welfare officer, so choosing only greyhounds would not represent a good or fair use of resources.”

RECOMMENDATION 36 – COMPLETED

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

CONTEXT

Recommendation 36 has alignment with the requirements of Recommendation 33, Recommendation 34 and Recommendation RSPCA 19.

Whilst Recommendation 36 was considered the responsibility of GRSA, the RSPCA also had involvement in the implementation of this recommendation.

A Memorandum of Understanding (MOU) is a non-legally binding written agreement that sets out the terms of the relationship and responsibilities between parties.

The GIRI considered Recommendation 36 to encompass two distinct actions:

- GRSA's consideration in amending the Local Rules, and
- GRSA's consideration in formalising an MOU with the RSPCA.

The Ashton Report noted GRSA may “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.”

Further context regarding this recommendation is included on pages 78 to 80 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

6 January 2026

VERIFICATION PROCESS

GRSA submitted a copy of a draft MOU that had been the subject of ongoing discussions between GRSA and the RSPCA.

GRSA advised the GIRI it had attempted to progress the formalisation of the MOU with the RSPCA but efforts had been unsuccessful.

The GIRI received direct confirmation from the CEO, RSPCA advising it “will not enter into a Memorandum of Understanding (MOU) with GRSA. This decision reflects our assessment that recent legislative changes, which mandate the reporting of animal welfare offences, negate the need for an MOU, as it would not provide additional operational or procedural benefits.”

GRSA subsequently submitted a draft version of proposed new Local Rule 131C.

131C Provision of information to external regulators and law enforcement

- (1) *The Controlling Body may provide any and all information provided under rule 131B to a person employed or engaged by Royal Society for the Prevention of Cruelty to Animals (SA) (RSPCA) who is an authorised officer under the Animal Welfare Act 2025 (SA) or the South Australia Police (SAPOL) for the purpose of investigation and enforcement action or otherwise to meet its obligations under the Animal Welfare Act 2025 (SA).*
- (2) *The Controlling Body may provide any and all information received or gathered by the Controlling Body in the exercise of its powers and functions under these Rules in relation to a suspected offence under rule 131 or the ill treatment of any greyhound, including images and recordings made of registered persons and private properties, to a person employed or engaged by Royal Society for the Prevention of Cruelty to Animals (SA) (RSPCA) who is an authorised officer under the Animal Welfare Act 2025 (SA) or the South Australia Police (SAPOL) for the purpose of investigation and enforcement action or otherwise to comply with its obligations under the Animal Welfare Act 2025 (SA).*

The GIRI was satisfied that the proposed Local Rule 131C would satisfy the intent of the recommendation if implemented. The GIRI requested GRSA to advise once the Local Rule had been implemented.

GRSA advised Local Rule 131C had subsequently been implemented.

The GIRI visited the GRSA website and viewed Local Rule 131C within the GRSA Local Rules document (dated 1 January 2026), confirming the implementation of the new Local Rule. The GIRI noted that, whilst meeting the requirements of Recommendation 36, Local Rule 131C also enables information sharing between GRSA and South Australia Police (SAPOL).

The GIRI accessed IWC Minutes from the November 2025 meeting evidencing in-principle support of Local Rule 131C.

The GIRI noted the changes to Local Rule 131C had been communicated to the industry through various sections of the GRSA website.

The GIRI was satisfied that Part 1 of the recommendation to amend the Local Rule had been completed.

As the recommendation only required consideration and the GIRI was satisfied both GRSA and the RSPCA had shown consideration toward the formalisation of the MOU and the intention of the recommendation had been met, the GIRI verified this recommendation as complete.

COMMENTARY

The Ashton Report notes “the relationship between GRSA and the RSPCA is critical if greyhound welfare is to be upheld in South Australia.”

In the GIRI’s view, the lack of willingness by the RSPCA to enter into an MOU with GRSA does not prohibit the implementation of Recommendation 36. The clear intent rests with GRSA to take accountability for the reporting/sharing of information with the RSPCA.

The new Local Rule achieves this, as does the proposed mandatory reporting requirements (Recommendation 33) and GRSA/RSPCA regular meetings (Recommendation 34).

It should be noted that the recommendation was for GRSA to “consider” amending the Local Rules, yet it went further by both considering and implementing. Similarly, the recommendation required GRSA to address information sharing with the RSPCA, yet it went further by including information sharing with SAPOL within the new Local Rule.

RECOMMENDATION 37 – COMPLETED

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

CONTEXT

GRSA publish IHP Hearing and Steward Inquiry outcomes publicly on its website within the ‘Integrity Reports’ section.

The Ashton Report contained significant commentary regarding this recommendation. The Report stated “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... 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.”

“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.”

Further context regarding this recommendation is included on pages 78 to 80 and 109 to 111 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

23 February 2026

VERIFICATION PROCESS

This recommendation has been the subject of ongoing communication between the GIRI and GRSA.

GRSA submitted advice that all IHP Hearings and Stewards Inquiries outcomes had been published and provided links to the relevant GRSA website pages where the outcomes could be accessed.

The GIRI requested GRSA provide a register listing all IHP Hearings and Stewards Inquiries to cross-reference against those published on the GRSA website.

GRSA subsequently submitted a consolidated hearing summary spreadsheet containing all matters, their outcomes and their publication status.

The GIRI requested GRSA provide additional information as to whether each matter contained in the spreadsheet related to either an IHP Hearing or a Stewards Inquiry. The GIRI also asked for GRSA to cross-reference the information contained in the spreadsheet against that in Table 2 on pages 109 to 111 of the Ashton Report.

GRSA subsequently submitted a cross-referenced version of the spreadsheet identifying matters contained in Table 2 in the Ashton Report.

The GIRI examined the material provided by GRSA, noting the following:

- Some entries in the spreadsheet could not be reconciled against specific entries in Table 2 in the Ashton Report.
- A number of individuals in the published outcomes were not named but referred to as ‘Registered Persons’.

The GIRI requested that GRSA clarify these anomalies.

GRSA subsequently re-submitted the spreadsheet addressing the above.

The GIRI re-examined the information presented to confirm the corrections had been made.

The GIRI also reviewed the Stewards Inquiry and IHP Hearing outcomes as published on the GRSA website to ensure these documents were being published as required in the recommendation.

The GIRI verified this recommendation as complete.

RECOMMENDATION 38 – COMPLETED

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

CONTEXT

The Ashton Report notes that “As the table shows, most matters have resulted in either a reprimand, suspended suspension, or closure with guidance/counselling and no charges laid.” The Report is referring to welfare related investigations and inquiries as represented in Table 2 on pages 109 to 111.

“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’.”

The involvement of the GIRI in this process provided another step of transparency and accountability over animal welfare investigations and inquiries before they were closed without charge.

The Ashton Report does not propose what the GIRI’s responsibility is when advice is received from GRSA in these types of matters (i.e. whether the GIRI should endorse GRSA’s proposed action against the participant or suggest the appropriate action). The GIRI views that to ‘be consulted’ is to be given its standard meaning (i.e. to be asked for advice, opinion or approval). On that basis, the GIRI provided his view on proposed action on cases presented through Recommendation 38 prior to their closure.

Further context regarding this recommendation is included on pages 78 to 80 and 109 to 111 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 October 2025

VERIFICATION PROCESS

GRSA submitted an initial case of a current animal welfare investigation intended to be closed without charge (Report A), seeking consultation from the GIRI on the proposed ‘no charge’ finding. GRSA also sought feedback on the proposed format and level of detail included in the file.

The GIRI provided advice on Report A as requested.

The GIRI also asked for additional information on other welfare-related cases that had occurred with no charges laid since the commencement of the GIRI’s term.

GRSA sent the GIRI a letter confirming adoption of the process to consult the GIRI on cases where no charges are proposed. GRSA also informed it had incorporated previous advice provided by the GIRI on this process.

GRSA submitted a copy of the Report A investigation report showing it had agreed to include the GIRI’s feedback and advice regarding the outcome of the investigation.

GRSA submitted its updated ‘Complaint Handling Policy’ and ‘Investigation Protocol’ confirming mandatory consultation with the GIRI regarding matters that fall under Recommendation 38.

GRSA submitted the updated IWC Charter confirming the need to consult with the GRI regarding matters that fall under Recommendation 38. An excerpt is included below.

3 Responsibilities of the IWC

3.3 Additional responsibilities

(k) Consulting with the Greyhound Industry Reform Inspector (GRI) as needed to perform its responsibilities and to comply, where lawful, with recommendations 38 and 57 of the Independent Inquiry into the Governance of the Greyhound Racing Industry (published 30th November 2023);

The GRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

Since the initial verification of this recommendation the GRI has been consulted on an additional five welfare-related matters that GRSA proposed to close without charge.

RECOMMENDATION 39 – COMPLETED

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

CONTEXT

This recommendation has alignment with Recommendation 44.

The GIRI identified Recommendation 39 as one of the most significant recommendations included in the Ashton Report. This recommendation was the subject of ongoing discussion between the GIRI and GRSA throughout the reporting period.

The Ashton Report noted “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 table 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...”

“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.”

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 ²
Minimum requirements for two greyhound			
Enclosure type	Minimum width	Minimum height	Total area
Pen (includes kennel)	2.4 metres	1.8 metres	7m ²
Mating Greyhounds Pen	3 metres	1.8 metres	3.5m ²
Minimum requirements for whelping greyhounds			
Enclosure type	Requirements / Area		
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 ²	
Whelping greyhounds housing pen (includes kennel)	One dam and her litter of pups aged over 8 weeks require an additional 15m ² of space.	30m ²	

Further context regarding this recommendation is included on pages 80 and 81 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

26 June 2026

VERIFICATION PROCESS

This recommendation has been the subject of ongoing discussions throughout the two-year reform period, as such, key dates have been included.

In June 2025 GRSA submitted a current version of its Animal Welfare Policy (AWP) (taking effect 23 April 2024) which included the table below with minimum space requirements at the time of the Ashton Report.

Kennels

Kennel type	Use	Recommended size (square metres)
Boarding	Boarding a single greyhound	4.8m ² with accessible yard of 5m ²
Day/spelling	Housing one or more greyhounds not in race training. Generally, has an attached or accessible yard.	4.8m ² with accessible yard of 5m ²
Isolation/quarantine	Housing a single greyhound that has a suspected/diagnosed infectious disease	4.8m ²
Racing	Housing a single greyhound only in race training. Secure facility and designed to encourage rest	Minimum 1m wide and at least 2.4m ²
Whelping	Enclosure with attached puppy yard. Designed for a breeding female to whelp a litter of pups. Whelped puppies generally housed in this area until four (4) months of age with breeding female to be removed from this area at weaning	6m ² with an accessible yard of 15m ²
Whelping box	A box used by a breeding female to whelp a litter. GRSA recommend that a crush rail is installed	Minimum 1.5m × 1.8m

GRSA also submitted the draft of an updated 2025 version of the AWP including minimum space requirements consistent with Recommendation 39. The two documents showed the adoption of the change in minimum space requirements of Recommendation 39.

GRSA submitted a cross-referenced AWP table indicating the changes between the previous and new versions of the AWP.

GRSA submitted a Steward's Notice advising the industry of the changes to minimum size requirements.

GRSA submitted a Board Paper detailing the IWC endorsement of the draft amended AWP and requesting Board approval of the document. GRSA submitted Board Minutes evidencing Board approval of the draft AWP.

The GIRI requested that GRSA provide evidence of the actions it had undertaken to implement this requirement on existing kennels.

In November 2025 GRSA subsequently advised the GIRI that Recommendation 39 remained in progress including communication with industry and Board discussions. An initial review of kennel sizes indicated approximately 2,000 kennels throughout the state with 50% estimated as being compliant.

In December 2025 GRSA advised the GIRI that the industry is still being consulted with an intention that participants must comply with the new minimum size requirements by 1 July 2026 or not be permitted to house greyhounds in non-compliant kennels.

In January 2026 GRSA advised the GIRI that Recommendation 39 was still in progress and GRSA was offering a rebate scheme to participants conducting works to make their kennels compliant with the new minimum space requirements.

In March 2026 GRSA provided an update on the implementation of Recommendation 39 advising that of 1,935 kennels, 44.03% were compliant with the new minimum space requirements. GRSA also provided more detailed information on the rebate scheme.

The GIRI advised GRSA that Recommendation 39 (along with Recommendation 44) would involve the GIRI conducting kennel inspections at registered properties to ensure compliance with the AWP.

In May 2026 GRSA submitted an updated spreadsheet containing kennel compliance details for all registered properties.

In June 2026 The GIRI conducted random, unannounced inspections and measured kennels at properties in Two Wells, Lewiston, Ettrick, Murray Bridge East, Macclesfield, Callington, Penola, Millicent, Allendale East, Glencoe, German Creek, Compton, Mount Gambier, Worrolong and Tarpeena.

The GIRI measured and found that some kennels subject to Recommendation 39 and 44 were non-compliant with the AWP despite being previously approved by GRSA (as detailed in its May 2026 compliance spreadsheet).

GRSA advised it would re-measure every registered kennel to ensure accuracy of measurements and compliance with minimum space requirements.

GRSA subsequently provided a copy of the 'Kennel Compliance and Welfare Rebate Scheme Policy' and Board Papers evidencing Board approval of the policy.

GRSA submitted a copy of a Board Paper detailing progress on the current rebate scheme claims provided to upgraded kennels.

GRSA submitted a Board Paper identifying trainers at risk of continued non-compliance with minimum space requirements contained in the AWP and strategies taken to reduce or mitigate the risk.

GRSA advised 1,902 kennels had been re-checked.

GRSA provided an updated spreadsheet detailing a complete list of registered properties including the total number of kennels at each property and their compliance status.

The GIRI advised GRSA he would be undertaking further random kennel inspections to audit GRSA's updated kennel compliance data.

The GIRI visited registered properties in Ettrick, Strathalbyn, Palmer, Lewiston and Two Wells to audit and verify GRSA's subsequent measurements.

GRSA provided the GIRI with photos of kennels at properties in the Mount Gambier region. From these photos the GIRI was able to verify the appropriate upgrades had been made to ensure compliance with minimum space requirements.

The GIRI was satisfied that GRSA had adopted the minimum size kennel requirements as detailed in the updated AWP and that this change had been communicated to the industry. The GIRI witnessed evidence of registered participants that had conducted works to upgrade their kennels to fulfil the new requirements, evidencing implementation of the requirements of the updated AWP by the industry.

The GIRI advised GRSA this recommendation was verified as complete.



RECOMMENDATION 40 – COMPLETED

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.

CONTEXT

GRSA describes tethering in its AWP as “...the practice of securing a greyhound to a stationary object or stake in the ground with a rope, chain, or similar restraint to restrict the greyhound’s movement within a specified area. Tethering is sometimes used for various reasons, including temporary restraint during outdoor activities or as a part of training exercises.”

The Ashton Report noted “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.”

Further context regarding this recommendation is included on page 82 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted Minutes from its April 2024 Board meeting approving the draft amendment to the AWP covering tethering.

GRSA submitted Minutes from its October 2024 Board meeting approving Recommendation 40 as adopted, amended and completed.

GRSA provided a copy of the amended AWP including the following updated tethering requirements:

*The practice of tethering is **not a standard or recommended method** of restraint. However where tethering is considered necessary:*

- *Greyhounds must be under continuous supervision by a registered person when tethered. This ensures that any distress or entanglement can be properly addressed, minimising the risk of injury or discomfort to the greyhound. Greyhounds must not be tethered for more than two hours per day. This limitation is in place to prevent undue stress and to ensure that the greyhounds have ample opportunity for free movement, social interaction, and rest.*

Greyhounds must not be tethered in any circumstances that could be detrimental to their health and welfare. This includes, but is not limited to:

- *Extreme weather conditions (eg, excessive heat, cold, or during severe weather events)*
- *Areas without access to adequate shelter, water, or shade.*
- *Surfaces that could cause injury to the dog (eg, overly rough or hot surfaces)*

Failure to adhere to this policy will result in disciplinary action, which may include proceedings for breach of L131 of the Local Rules.

The GIRI confirmed the amendments to the AWP in relation to tethering achieved the requirements of the recommendation.

The GIRI verified the recommendation as complete.

RECOMMENDATION 41 – COMPLETED

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.**

CONTEXT

The Ashton Report noted “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.”

“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.”

Further context regarding this recommendation is included on page 82 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted Minutes from its April 2024 Board meeting approving a draft amendment to the AWP covering pest control.

GRSA submitted Minutes from its October 2024 Board meeting approving Recommendation 41 as adopted, amended and completed.

GRSA provided a copy of the amended AWP including the following updated pest control section:

Pest Control

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, prioritising the well-being of greyhounds and compliance with relevant health and safety regulations.

ORDER

All pesticides must be kept in their original container and must be commercially available and registered by the Australian Pesticides and Veterinary Medicines Authority (APVMA). The use and storage of pesticides must be in accordance with the manufacturer's instructions. Pesticides are not to be stored in food preparation areas or in any circumstances whereby they could be consumed by greyhounds or children.

Greyhounds must be removed from any areas where and while noxious pesticides are being used to ensure their safety and welfare. Adequate ventilation must be ensured in areas recently treated with pesticides before allowing greyhounds to return.

Expert advice from a person holding a pesticide license should be sought before pest control operations are carried out to ensure that the chosen methods are safe, effective, and compliant with current regulations. A veterinarian should be consulted regarding the pesticides and their ingredients to ensure that none of the ingredients are prohibited or harmful to the greyhounds.

The use of traps for pest control must not contravene the Animal Welfare Act 1985 (SA). Traps used must be humane and checked regularly to prevent unnecessary suffering to captured animals.

Regular monitoring of pest control measures must be conducted to assess their effectiveness and safety.

The GIRI confirmed the amendments to the AWP in relation to pest control achieved the requirements of the recommendation.

The GIRI verified the recommendation as complete.

RECOMMENDATION 42 – COMPLETED

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.

CONTEXT

Recommendation 42 should be read in conjunction with Recommendation 43.

The Ashton Report noted “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.”

“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.”

Further context regarding this recommendation is included on page 83 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 July 2025

VERIFICATION PROCESS

GRSA submitted a copy of the 2021 AWP.

GRSA submitted a draft version of the 2025 AWP to come into effect 30 June 2025.

The updated ‘Exercise, Socialisation and Enrichment’ section included the following amendment:

ORDER

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.

GRSA submitted a cross-referenced AWP table indicating the changes between the 2021 and 2025 versions of the AWP, with specific references to Ashton Report recommendations.

GRSA submitted a Steward’s Notice to the industry via the GRSA website, advising of the new AWP on 31 July 2025.

GRSA submitted an extract from its April 2025 Board meeting approving proposed amendments to the AWP.

The GIRI confirmed the updated AWP included changes made to requirements for the exercise, socialisation and enrichment of greyhounds.

The GIRI verified this recommendation as complete.

RECOMMENDATION 43 – COMPLETED

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

CONTEXT

Recommendation 43 should be read in conjunction with Recommendation 42.

The Ashton Report noted “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.”

Further context regarding this recommendation is included on page 83 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 July 2025

VERIFICATION PROCESS

GRSA submitted a copy of the 2021 AWP.

GRSA submitted a draft version of the 2025 AWP to come into effect 30 June 2025.

The updated ‘Exercise, Socialisation and Enrichment’ section included the following amendment:

ORDER

Exercise, socialisation and enrichment recommendations are mandatory, and non-compliance may constitute a disciplinary offence.

GRSA submitted a cross-referenced AWP table indicating the changes between the 2021 and 2025 versions of the AWP with specific references to Ashton Report recommendations.

GRSA submitted a Steward’s Notice to the industry via the GRSA website, advising of the new AWP on 31 July 2025.

GRSA submitted an extract from the April 2025 Board meeting approving proposed amendments to the AWP.

The GIRI confirmed the changes in the AWP in regards to exercise, socialisation and enrichment had been updated from recommendations to mandatory requirements.

The GIRI verified this recommendation as complete.

RECOMMENDATION 44 – NOT COMPLETED

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.

CONTEXT

This recommendation has alignment with Recommendation 39.

GRSA defines a retired greyhound in its AWP as “...a greyhound that has been retired from the industry (no longer racing or breeding) ... Any retired greyhound on a registered facility or in the custody or control of a responsible person is bound by this Policy.”

GRSA defines ‘spelling’ in its AWP as “...a period of rest for a greyhound, for any reason.”

The Ashton Report noted that “Due to a number of current environmental factors, GAP is having challenges in achieving its stated goal of rehoming 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.”

The Ashton Report observed greyhounds “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 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 context regarding this recommendation is included on pages 84 and 85 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

Not considered as complete.

VERIFICATION PROCESS

This recommendation has been the subject of ongoing discussions throughout the two-year reform period, as such, key dates have been included.

In February 2025 GRSA advised it had completed a review of the AWP. The policy would be amended to include a 3.5m² minimum space requirement for greyhound kennels as recommended in the NSW Greyhound Welfare and Integrity Commission Code of Practice. The new AWP also stated retired and spelling greyhounds retained by participants would be required to be transitioned to housing of a minimum of 15m².

GRSA advised it was reviewing all registered kennels for compliance with the new standard.

In July 2025 the GIRI provided feedback in relation to Recommendation 44 and requested evidence of GRSA's enforcement of its AWP. The GIRI also reinforced Recommendation 44's requirement for urgent implementation.

In December 2025 GRSA advised the GIRI it was communicating to industry participants that, as of 1 July 2026, non-compliance with the minimum size requirements would result in dogs being removed from their care.

GRSA also advised the GIRI that a proposed assistance package ('Kennelling Compliance and Welfare Fund Policy') would be put to its Board for its approval.

In March 2026 GRSA updated the GIRI on progress against Recommendation 44, advising it had undertaken the following actions.

- July 2025 – AWP updated and effective, including incorporation of mandatory standards.
- December 2025 – Industry-wide written communication issued (via email and Kennel Capers) advising all participants of the adopted minimum space requirements and access to the proposed Kennel Compliance and Welfare Rebate Scheme.
- December 2025 to January 2026 – Direct telephone contact made with all participants with registered kennels to confirm compliance status and intended pathway (upgrade, decommission, reduce capacity or exit).
- January 2026 – Summary of non-compliant kennels and proposed rectification pathways presented to the IWC.
- January 2026 – Kennel Compliance summary presented to the GRSA Board.
- February 2026 – Draft Kennel Compliance and Welfare Rebate Scheme finalised (progressing through approval process).
- February 2026 – Follow-up telephone engagement with participants who had not yet completed required upgrades to confirm plans, clarify timeframes, and reinforce requirements. Advised that GRSA will maintain monthly contact with these participants.

GRSA advised compliance oversight would be maintained through a Kennel Measurement Register and on-site inspections would continue to verify completed upgrades. At that time GRSA advised a total of 44.03% registered kennels were deemed to be compliant with the AWP.

In March 2026 the GIRI advised GRSA that Recommendation 44 (along with Recommendation 39) would involve the GIRI conducting random kennel inspections at registered properties to ensure compliance with the AWP.

In May 2026 GRSA submitted an updated spreadsheet containing kennel compliance details for all registered properties.

In June 2026 the GIRI conducted random, unannounced inspections and measured kennels at trainer properties in Two Wells, Lewiston, Ettrick, Murray Bridge East, Macclesfield, Callington, Penola, Millicent, Allendale East, Glencoe, German Creek, Compton, Mount Gambier, Worrolong and Tarpeena.

The GIRI measured and found that some kennels subject to Recommendation 39 and 44 were non-compliant with the AWP despite being previously approved by GRSA (as detailed in GRSA's May 2026 compliance spreadsheet).

GRSA advised it would re-measure every registered kennel to ensure accuracy of measurements and compliance with minimum space requirements.

GRSA subsequently provided a copy of the 'Kennel Compliance and Welfare Rebate Scheme Policy' and Board Papers evidencing Board approval of the policy.

GRSA submitted a copy of a Board Paper detailing progress on the current rebate scheme claims provided to upgraded kennels.

GRSA submitted a Board Paper identifying trainers at risk of continued non-compliance with minimum space requirements contained in the AWP and strategies taken to reduce or mitigate the risk.

GRSA advised 1,902 kennels had been re-checked.

GRSA provided an updated spreadsheet detailing a complete list of registered properties including the total number of kennels at each property and their compliance status.

The GIRI advised GRSA he would be undertaking further kennel inspections to audit GRSA's updated kennel compliance data.

The GIRI visited registered properties in Ettrick, Strathalbyn, Palmer, Lewiston and Two Wells to audit and verify GRSA's subsequent measurements.

ASSESSMENT

The GIRI considered Recommendation 44 as two parts:

11. The enforcement of the AWP.

As GRSA's enforcement of this recommendation did not commence until 1 July 2026, the GIRI was not able to witness any evidence of enforcement prior to the completion of the reform period on 7 July 2026. Throughout the two-year period, GRSA has not submitted evidence of any enforcement actions arising from the non-compliance of the AWP, in relation to Recommendation 44.

12. The requirement to enforce the AWP "urgently."

The Ashton Report was concerned with the welfare of South Australian greyhounds and saw an urgent need to enforce kennelling standards.

GRSA has been aware of the Ashton Report recommendations since November 2023, when the Report was released. There has been no evidence of any urgency being applied to the enforcement of this recommendation.

Accordingly, the GIRI does not consider this recommendation as complete.

RECOMMENDATION 45 – NOT COMPLETED

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

CONTEXT

The Ashton Report noted that “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.”

“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.”

“...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.”

Further context regarding this recommendation is included on pages 84 and 85 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

Not considered as complete.

VERIFICATION PROCESS

This recommendation has been the subject of ongoing discussions throughout the two-year reform period, as such, key dates have been included.

GRSA initially submitted a feasibility study for a proposed GAP facility at Murray Bridge as part of the Murray Bridge Greyhound Racing Club precinct. The feasibility study proposed the facility would house between 100 and 120 greyhounds.

In October 2024, GRSA subsequently advised the GIRI it was continuing to assess various options for a GAP facility. GRSA had appointed a third-party contractor to consider options at both Murray Bridge and Angle Park. The Angle Park alternative included shorter and longer-term housing options.

GRSA advised that the GRSA Board resolved to support a fast-tracked preparation of detailed plans and a business case for an under-grandstand short-term housing option at Angle Park with the provision for 25 kennels.

GRSA subsequently provided an update on the proposed Angle Park construction to house approximately 30 greyhounds. The update included an acoustic design report and business case.

In March 2025, GRSA advised it was also pursuing additional options to complement the Angle Park kennels. The potential options discussed were the purchase of land for a stand-alone GAP facility and the leasing of land proximate to the Virginia coursing track. GRSA proposed to hold at least 100 greyhounds at these facilities within blocks of 20-30 kennels.

GRSA advised the option for a Murray Bridge facility was also continuing with plans being drawn and ongoing discussions with the local council.

In November 2025, GRSA advised work had commenced on the Angle Park site to construct kennels. The kennels were expected to be operational by May 2026.

In December 2025, GRSA advised plans for a Murray Bridge facility were continuing and other alternatives were not being pursued.

In January 2026, GRSA advised the GIRI that discussions remained ongoing regarding the proposed Murray Bridge facility. However, GRSA had given its approach to rehoming broader consideration and believed the following methods would address the needs of the greyhounds and prepare them for rehoming:

- Continue the prison rehoming program and expand it into other prisons;
- Enhance the fostering process, identifying appropriate people and assist them to prepare the dogs for adoption;
- Provide training to better prepare trainers who hold dogs for an extended period of time to prepare them for adoption.

GRSA sought advice from the GIRI as to whether the Angle Park kennels, in combination with the proposed approach to rehoming (i.e. prisons/foster homes/trainer education) and the redevelopment of a GAP-leased facility would satisfy the requirements of this recommendation.

The GIRI advised GRSA that any alternate proposal to acquiring a new facility (i.e. Angle Park short-term option) would not satisfy the requirements of this recommendation, and requested this feedback be communicated to the GRSA Board.

In February 2026, GRSA confirmed the Angle Park kennels (now referred to by GRSA as the ‘Pet Placement Centre’) would house 30 dogs and the May 2026 completion date was still expected. It was also advised the proposed Murray Bridge facility would house 24 dogs, with the plans to expand to 48, and was estimated to be completed by November 2026.

In April 2026, GRSA advised the planning of a proposed Murray Bridge facility continued. GRSA also raised the possibility of purchasing a property in the Adelaide Plains area as an alternative option for a dedicated GAP facility. The GIRI conducted a preliminary site visit at the Adelaide Plains property where it was observed that the site already had some existing kennel facilities.

In May 2026, the GIRI conducted a site visit of the Angle Park Pet Placement Centre (PPC). The kennels were still under construction and not yet operational.

In June 2026, GRSA submitted this recommendation to the GIRI for completion. GRSA had identified and begun the process for the purchase of a property in the Adelaide Plains region for the development of a dedicated GAP facility. GRSA advised this facility would be supported by the PPC under construction at Angle Park (now due for completion in August 2026). Current Council approval at the Adelaide Plains property was initially for 20 kennels and the settlement date for purchase was in June 2026.

GRSA provided:

- Board approval via Circular Resolution for the purchase of the Adelaide Plains property.
- Copy of signed Contract of Sale for the Adelaide Plains property.
- Email from the Local Council confirming the existing approval for 20 dogs and kennels.

The GIRI requested the further additional information from GRSA:

- Confirmation on the final settlement of the Adelaide Plains property.
- Advice on how many existing kennels on the property can be used.
- Advice on further plans to increase the number of kennels on site.
- Advice regarding the expected construction commencement date and when the facility is expected to be operational.
- The number of dogs awaiting rehoming at present and how they would be housed when the Angle Park and Adelaide Plains facilities are in operation.

GRSA subsequently submitted correspondence which confirmed the Adelaide Plains property settlement had occurred in June 2026.

GRSA also advised:

- The Adelaide Plains property currently has 14 kennels which were compliant with the AWP minimum size requirements.
- Council approval is for a maximum of 20 kennels on site, which GRSA intended to be operational by 31 July 2026.
- Proposed future expansion aims to house 50 kennels, 40 of which will be utilised for GAP dogs.
- GRSA reported a current total of 420 greyhounds awaiting rehoming with 257 currently in trainers' care, an additional 22 within the prison program, 90 with foster carers and 51 with GRSA-contracted kennels.
- The Adelaide Plains property would complement the Angle Park PPC as part of GRSA's rehoming strategy.



In July 2026, the GIRI conducted a full site tour of the Adelaide Plains property and observed that while the existing kennels met the AWP minimum size requirements, they required remedial works prior to being operational.

In July 2026, GRSA provided a final submission advising the Adelaide Plains property had now been cleared to support commencement of remediation work. GRSA advised the intent would be to allow between six and 14 greyhounds to be housed within the facility by August 2026 with a long-term intention to expand to 50 kennels. It was advised that additional Council approval would need to be sought for expansion to house more than 20 dogs.

ASSESSMENT

The Ashton Report was clear as to the intent behind the recommendation, including the concerns with GRSA-leased GAP facilities. In this respect, the recommendation requires GRSA to “acquire a stand-alone facility.”

In response GRSA has commenced construction of an Angle Park PPC and purchased a property in the Adelaide Plains region and submitted that these address the requirements of Recommendation 45.

Angle Park PPC

It is the GIRI's assessment that whilst this facility is able to contribute to GRSA's strategic plans regarding rehoming, it does not have any bearing on the completion of this recommendation as it was neither acquired nor is it a stand-alone facility. Even if it was considered to be acquired or a stand-alone facility, at the completion of the reform period, the Angle Park PPC remained under construction and not yet operational. Once completed, it is expected that the PPC will house up to 30 greyhounds, however it does not appear to substantially address GRSA's rehoming needs.

Adelaide Plains Property

The GIRI is satisfied GRSA has acquired a stand-alone property, with the intention of it becoming a dedicated GAP facility. Nonetheless, at the conclusion of the reform period, it was not yet operational nor was suitable to house any greyhounds.

Therefore, at the conclusion of the reform period, neither the Angle Park PPC nor the Adelaide Plains rehoming facility are housing greyhounds.

For these reasons, this recommendation is not verified as complete.

COMMENTARY

The GIRI notes the observations and criticisms outlined on pages 84 and 85 of the Ashton Report. The Report details the challenges that GAP has in rehoming all eligible greyhounds. The Report referred to dedicated GAP facilities in NSW and Victoria which had addressed these challenges and thus informed Recommendation 45.

During the reform period, the GIRI visited dedicated greyhound rehoming and adoption facilities in New South Wales, Queensland and New Zealand. The GIRI also had previous knowledge of the GAP facility in Seymour, Victoria. The GIRI observed Angle Park PPC did not provide any resemblance to the other rehoming facilities, and the Adelaide Plains property would require significant investment to reach the same standards.

At the time of the Ashton Review, there were a total of 186 dogs requiring rehoming. In June 2026, GRSA advised that there are currently 257 dogs awaiting rehoming, not including those with third parties. The GIRI accepts the Angle Park PPC is a positive initiative and part of a broader strategy by GRSA. However, the Angle Park PPC and the Adelaide Plains property do not currently provide confidence that GRSA will satisfy its immediate or future GAP housing needs for dogs awaiting rehoming.

GRSA holds major accountability in greyhound welfare and rehoming. To this end, Recommendation 45 was an opportunity for GRSA to display leadership by prioritising efforts to complete this recommendation. The non-completion of this recommendation raises doubts that GRSA placed the expected emphasis on rehoming as part of its organisational responsibility.

RECOMMENDATION 46 – COMPLETED

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.

CONTEXT

The Ashton Report observed that GRSA's AWP should contain enforceable directives, rather than just guidelines. This observation is also reflected in other recommendations.

Further context for this recommendation can be found on pages 84 and 85 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 July 2025

VERIFICATION PROCESS

GRSA submitted a copy of the 2021 AWP.

GRSA submitted a draft version of the 2025 AWP (effective 30 June 2025).

The updated AWP included the following section on page 5:

Guidance in this policy that uses the terms:

- (i) **Are to, are not to, is to and is not**, requires compliance with and is not to be departed from; and, and failure to adhere to these requirements may result in discipline action being taken;*
- (ii) The standards enforced by GRSA under this Policy that are recommendations (including the terms “recommend”, “recommended” and “recommendation” are mandatory requirements. Failure to adhere to these requirements may result in discipline action being taken.*

RECOMMENDATIONS → MANDATORY REQUIREMENTS

The updated AWP also changes the wording of 'recommended' to 'mandatory' throughout the document.

GRSA submitted a cross-referenced AWP table indicating the changes between the 2021 and 2025 versions of the AWP with reference made to Ashton Report recommendations.

GRSA submitted a Steward's Notice to the industry published on the GRSA website advising of the new AWP on 31 July 2025.

GRSA submitted an extract from its April 2025 Board meeting approving proposed amendments to the AWP.

The GIRI confirmed the updated AWP included the necessary changes of upgrading recommendations to mandatory requirements as required by Recommendation 46.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested that GRSA provide a list of all animal welfare-related breaches since the initial recommendation verification date.

GRSA submitted a list of Stewards Inquiries and penalties recorded against participants for welfare-related matters since the initial recommendation verification date.

The GIRI confirmed the recommendation was ongoing.

RECOMMENDATION 47 – COMPLETED

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.

CONTEXT

Recommendation 47 is to be read in conjunction with RSPCA Recommendation 9.

The Australian Veterinary Association (AVA) website advises:

“Surgical AI has been used in dogs for many years as an intrauterine insemination technique. It involves general anaesthesia of the animal, laparotomy, exteriorisation of the uterus and transuterine wall introduction of (typically) frozen thawed semen into the uterine lumen. This is then followed by replacement of the uterus into the abdomen, and closure of the laparotomy site.”

The Ashton Report states “The current GRSA animal welfare policy does not cover the current industry practice of artificial insemination (AI).”

“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.”

TCI refers to Transcervical Artificial Insemination – an alternative method of insemination in the greyhound which does not involve surgery.

The Ashton Report noted “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.”

In September 2024, Greyhounds Australasia, as the greyhound racing industry peak body, announced the use of Surgical Artificial Insemination (SAI) in registered greyhounds would cease from 1 January 2026.

Further context for this recommendation can be found on page 86 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

1 July 2025

VERIFICATION PROCESS

This recommendation was described by the Ashton Report as “immediate” and, as such, key dates have been included.

In September 2024 GRSA advised the GIRI it was moving to ban SAI in-line with the national GA ban of 1 January 2026. The GIRI drew attention to the word “immediately” in the wording of Recommendation 47 and advised this proposed action would not be supported.

GRSA also provided supporting information detailing GA’s approach to banning SAI nationally, including copies of:

- GA Report ‘Considerations for The Phase Out of Surgical AI and Transition to Transcervical AI’
- GA ‘SAI Phase Out Working Group Draft Terms of Reference’

In March 2025 GRSA provided the GIRI with a draft copy of a proposed Local Rule banning SAI. The GIRI reminded GRSA of the immediacy of this recommendation and advised it was required to:

- immediately ban its usage; and
- subject participants to disciplinary measures if they directly or indirectly use this method of breeding.

In May 2025 GRSA submitted this recommendation (along with Recommendation RSPCA 9) for completion. The following documents were included:

- An April 2025 Board Decision Paper including new Local Rule L41, addressing both Recommendation 47 and RSPCA 9.
- Extract from April 2025 Board Minutes endorsing implementation of a new Local Rule (L41) banning SAI.
- Extract from the March 2025 edition of Kennel Capers advising the industry of the new ban.

The new Local Rule states:

41 Prohibition of Surgical Artificial Insemination

- (1) A person commits an offence if they do, attempt to do, or cause to be done, any of the following acts, including any such act to a greyhound:*
 - (a) perform, facilitate, or arrange for the performance of surgical artificial insemination (SAI) on a greyhound within South Australia;*
 - (b) transport, or cause a greyhound to be transported, outside of South Australia for the purpose of undergoing SAI;*
 - (c) own, have custody of, or control a greyhound that has undergone SAI in contravention of this rule.*
- (2) Where a greyhound is, or is reasonably suspected to have been, subjected to SAI in breach of subrule (1), the Controlling Body or Stewards may take any of the following actions:*
 - (a) refuse the naming of the greyhound;*
 - (b) prohibit the greyhound from being nominated for any Event;*
 - (c) order the greyhound be scratched from any Event;*
 - (d) disqualify the greyhound from any Event;*
 - (e) require the forfeiture of any bonuses, incentives, or prizemoney derived or realised from the greyhound;*
 - (f) prohibit a greyhound from being registered;*
 - (g) refuse or cancel the registration of a litter;*
 - (h) cancel the registration of the greyhound;*
 - (i) take any other action deemed necessary in the interests of greyhound welfare and integrity.*
- (3) Any person who breaches subrule (1) may be penalised in accordance with the Rules.*
- (4) For the purposes of this rule, a person shall be deemed responsible for a greyhound undergoing SAI if they:*
 - (a) own, lease, or otherwise have custody or control of the greyhound at the time of the procedure; or*
 - (b) arrange for, facilitate, or direct that the procedure be carried out, regardless of where it occurs.*
- (5) Any person registered with Greyhound Racing SA Limited, including owners, trainers, breeders, and veterinarians, is subject to this rule, and ignorance of its provisions shall not be considered a defence.*
- (6) For the purposes of this rule:*
 - (a) “greyhound” means a breeding female and includes progeny thereof;*
 - (b) “Surgical Artificial Insemination (SAI)” means a procedure in which semen is implanted into a greyhound via a surgical incision, typically requiring general anaesthesia and an invasive abdominal procedure.*
- (7) In assessing the registration of a greyhound in South Australia, Greyhound Racing SA Limited may require the person requesting the registration to provide a certificate from the treating veterinarian confirming that the service of the breeding female was not performed by SAI.*
- (8) This rule commences on 1 July 2025.*

The GIRI verified the updated Local Rules had been published on the GRSA website and the communication had been provided to the industry through the latest edition of Kennel Capers.

The GIRI advised GRSA that all the necessary information had been provided but it could not verify the completion of the recommendation until the ban became effective on 1 July 2025.

The GIRI verified this recommendation as complete on 1 July 2025.

REVISIT OF RECOMMENDATION

In June 2026, the GIRI requested further advice regarding any participants who have been the subject of a disciplinary offence for using SAI since the introduction of the ban. GRSA advised there had been no breaches of this rule.

RECOMMENDATION 48 – COMPLETED

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).

CONTEXT

Recommendation 48 relates to the publishing of prohibited substance inquiry outcomes and promotes transparency and integrity of the industry.

The Ashton Report notes “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...”

Further context for this recommendation can be found on pages 87 to 90 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

23 May 2025

VERIFICATION PROCESS

GRSA submitted to the GIRI its Board approval of the new IHP decision form template containing all 12 factors contained in Recommendation 48.

GRSA submitted five recent IHP decision outcomes concerning prohibited substance inquiries evidencing alignment with the factors listed within Recommendation 48.

The GIRI reviewed these five decisions and confirmed that they cover the 12 factors listed within Recommendation 48. The GIRI also confirmed these decisions had been published on the GRSA website.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested updated outcomes for all Prohibited Substance Inquiries since the initial recommendation verification date.

GRSA submitted a spreadsheet of all prohibited substance inquiry outcomes from June 2025 to July 2026.

The GIRI confirmed GRSA had continued to use the template when producing IHP substance inquiry outcomes and these had been published online.

However, the GIRI noted that the ‘Concentration/mass’ section within the form was declared as “not available” or “Detected without quantification” in all accessible substance inquiry outcomes.

RECOMMENDATION 49 – COMPLETED

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.

CONTEXT

Recommendation 49 should be read in conjunction with Recommendation RSPCA 7.

The Ashton Report notes “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.”

“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.”

Further context for this recommendation can be found on pages 87 to 90 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted a copy of the updated IWC Charter which details the IWC’s responsibilities to include:

- (b) *Reviewing decisions of the IHP for the preceding period, to consider –*
 - (i) *if the penalty aligns with GRSA guidance on penalty (**Penalty Guidelines**) in force at the time;*
 - (ii) *if the penalty, objectively, serves as an adequate deterrent to industry.*

The GIRI requested copies of the IWC Agenda and Minutes showing review of penalty outcomes.

GRSA subsequently submitted IWC Minutes from its October 2024 meeting which included review of penalty outcomes.

The GIRI confirmed the recommendation was included as a standing item - Inquiries (Integrity Hearings Panel and Stewards) Update and Review. Through the Minutes of the standing item the GIRI was able to confirm penalty outcomes of recent inquiries were discussed.

The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested updated IWC Agendas from the initial recommendation verification date to determine regular review of penalty outcomes at IWC meetings.

GRSA advised the outcomes of all Steward Inquiries and IHP hearings are included on the IWC Agenda as a standing item each meeting.

GRSA provided IWC Minutes for each meeting held since the initial verification date. The GIRI confirmed review of penalty outcomes remained a standing item at the January 2025, March 2025, May 2025, July 2025, September 2025, November 2025, January 2026 and April 2026 meetings.

GRSA advised that the penalty guidelines were subsequently reviewed and approved by the GRSA Board at the October 2025 meeting, with a request for further review against interstate penalty guidelines.

GRSA advised that the penalty guidelines were re-reviewed at the December 2025 Board meeting and approved.

GRSA advised that the penalty guidelines will now be reviewed every 12 months, with the next review scheduled to occur in December 2026.

The GIRI confirmed the actions of this recommendation remained ongoing.

RECOMMENDATION 50 – COMPLETED

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.

CONTEXT

The Ashton Report notes “Table 3 on page 112 outlines the obligations of participants in relation to rehoming and euthanasia of greyhounds (whether raced or unraced).”

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 be re-homed privately. If the greyhound is sold or ownership transferred in circumstances where the registered person's rights over or hound has been surrendered and the greyhound can no longer be licenced or exist in detrimental conditions, the registered person is guilty of a Serious Offence.	LR 130(r) LR 130(a)
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 222(h)
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 recommendations. If further assessment required, greyhound must be presented to GAP for further testing and assessment.	LR 130(n), (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(c). A person must notify GRSA at least 10 working days before the euthanasia procedure. GRSA can make alternate directions to the 10-working-day timeframe if necessary.	LR 130(o) and 106A
Relevant greyhound has been euthanised by vet on the grounds above	Vet certificate and the prescribed form must be lodged by the Responsible Person with GRSA within 7 days of the euthanasia procedure.	LR 130(r) GAR 270(h)
When any greyhound is so seriously ill or injured and beyond treatment in the opinion of a vet that euthanasia is the only option and prior assessment by GAP is not practicable	Participant must comply with GAR 222(f)(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 overrides GAR 222(h) 10-day requirement).	LR 130(s) LR 130(n)

Scenario	Obligation	LR - Local Rule / GAR - Greyhound Australasia Rules
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(1A,A)
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 the euthanasia procedure.	LR 130(1A,A)(ii)

“...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.”

“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.”

Further context for this recommendation can be found on pages 90, 91 and 112 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

26 June 2025

VERIFICATION PROCESS

GRSA submitted a final copy of its ‘Re-Homing and Euthanasia Obligations Factsheet’.

GRSA submitted its February 2025 IWC Minutes showing discussion of the factsheet and its May 2025 IWC Minutes showing approval of the factsheet for submission to its Board.

GRSA submitted a June 2025 Circular Board Resolution showing its Board’s approval of the factsheet.

The GIRI checked the GRSA website and ensured the factsheet was accessible to the industry.

The GIRI confirmed the factsheet outlined participants’ obligations consistent with GAR 22 and LR 130 and verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In July 2026 the GIRI reviewed the GRSA website and found the Re-Homing and Euthanasia Obligations Factsheet remained publicly accessible.

RECOMMENDATION 51 – COMPLETED

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

CONTEXT

The Ashton Report noted “...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 bests (sic) 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.”

Further context for this recommendation can be found on pages 90 and 91 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

23 May 2025

VERIFICATION PROCESS

GRSA submitted its Governance and Risk Committee approval of amended Local Rule 130 from the November 2024 meeting.

GRSA submitted excerpts from its December 2024 Board meeting showing consideration of proposed changes to Local Rule 130 (Greyhound Welfare and Rehoming).

GRSA submitted the IWC Minutes from its January 2025 meeting approving the amended Local Rule 130.

GRSA submitted an extract from the Board Minutes from its February 2025 Board meeting approving amendments to Local Rule 130.

GRSA submitted an updated copy of the Local Rules with pages 39 and 40 showing amendments to Local Rule 130, as follows:

130 Greyhound rehoming obligations

- (1) Application of this rule*
 - a. This rule outlines obligations to ensure that greyhounds are properly retired and rehomed according to accepted welfare standards and community expectations.*
 - b. In this rule, possession by a responsible person includes direct or indirect custody, control or possession and includes ownership or equitable interest in a greyhound. There can be more than one responsible person for a greyhound.*
 - c. This rule applies to all responsible persons and greyhounds in their possession.*

(2) Notification Requirements

- a. *This rule is in addition to any other notification requirements in the Rules.*
- b. *A responsible person intending to:*
 - i. *Retire a greyhound; or;*
 - ii. *Euthanase a greyhound (except due to illness or injury in the greyhound's best interests), must notify the Controlling Body at least three (3) business days before taking such action.*
- c. *In cases of euthanasia due to illness or injury (e.g., catastrophic injury or terminal illness where immediate veterinary intervention is required to end pain and suffering), the responsible person must notify the Controlling Body in accordance with R22 of the Rules and sub-rule (6) of this rule.*

(3) Rehoming responsibility

- a. *Unless otherwise intended by written agreement between responsible persons, the owner of the greyhound bears the primary duty to rehome the retired greyhound in accordance with this rule. This primary duty, however, does not excuse the duty of any other responsible person for the retired greyhound to rehome the retired greyhound in accordance with this rule.*
- b. *Before rehoming a retired greyhound as a pet to another person or a recognised adoption agency, for export or surrender to another entity, the responsible person must:*
 - i. *Notify GAP SA of the intended rehoming of the retired greyhound;*
 - ii. *If required by the Controlling Body (including GAP SA), present or otherwise make available the retired greyhound for evaluation by GAP SA for rehoming suitability; and,*
 - iii. *If the retired greyhound is suitable for rehoming, make all reasonable efforts to place that retired greyhound as a pet with another person or a recognised adoption agency .*
- c. *A retired greyhound must not be kept by the responsible person, rehomed, or otherwise transferred to any other person or entity, where the responsible person knows or should reasonably know, the greyhound will likely:*
 - i. *Be euthanised (except as permitted under this rule); or,*
 - ii. *Live in conditions detrimental to the greyhound's welfare.*

(4) Health and dental treatment

- a. *Unless the retired greyhound is rehomed to GAP SA or another recognised adoption agency that performs preventive health and dental treatment (GAP work):*
 - i. *The responsible person must ensure the retired greyhound undergoes GAP work by a veterinarian before rehoming; and,*
 - ii. *A certificate or other evidence of GAP work from a veterinarian must accompany the notification of retirement to the Controlling Body.*
- b. *This sub-rule is effective on and from a date prescribed under Stewards' Notice.*

(5) Restrictions on euthanasia

- a. *Euthanasia of a greyhound is only permitted:*
 - i. *Under sub-rule (2)(c); or,*
 - ii. *Where GAP SA deems the greyhound unsuitable for rehoming on veterinary or behavioural grounds and despite other reasonable efforts, suitable rehoming options cannot be found, and no other viable alternatives exist.*
- b. *Where euthanasia is intended to be performed under sub-rule (5)(a)(ii), notice must be given to the Controlling Body under sub-rule (2)(b)(ii).*
- c. *Euthanasia must be performed humanely by a veterinarian.*
- d. *A responsible person is guilty of an offence of ill-treatment of a greyhound if that greyhound is killed contrary to this sub-rule.*

(6) Documentation Requirements

For all euthanasia procedures, the responsible person must lodge with the Controlling Body the following to comply with R22 of the Rules:

- a. Written notice of euthanasia prescribed by the Controlling Body;*
- b. A veterinary certificate of euthanasia (either separately or as a part of the prescribed form); and,*
- c. Written consent of the responsible person for the Controlling Body to access the veterinary file for the greyhound.*

(7) Prohibition against circumvention

- a. A responsible person must not use retirement, transfer, or any other rehoming to circumvent welfare obligations by:*
 - i. Transferring a retired greyhound to themselves or others for the purpose of subsequent euthanasia or killing; or,*
 - ii. Failing to provide accurate information about the greyhound's welfare or future care or keeping.*
- b. The Controlling Body may investigate any retirements that appear intended to avoid rehoming requirements.*

(8) Penalties for non-compliance

A responsible person who commits a breach or otherwise fails to comply with this rule commits a serious offence and subject to penalties under the Rules including suspension and disqualification.

GRSA submitted the April 2025 edition of Kennel Capers advising the industry of their obligations under amended Local Rule 130.

The GIRI assessed the information provided as sufficient to satisfy the intention of the recommendation, however it should be noted that this recommendation required urgent action.

The GIRI verified this recommendation as complete.

RECOMMENDATION 52 – COMPLETED

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

CONTEXT

The Ashton Report noted “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.”

Further context for this recommendation can be found on pages 93 to 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

1 April 2026

VERIFICATION PROCESS

GRSA submitted its 2026 ‘Greyhounds As Pets Marketing Strategy Overview’ document.

GRSA submitted a Board Decision Paper approving an increased marketing investment and proposed budget of \$100,000 (\$38,000 of which was previously unbudgeted) supporting the delivery of:

- Paid media.
- Website redevelopment requirements.
- Marketing assets and photography.
- Events and promotional activation.
- Restructuring and increased investment in the GAP team – an additional FTE and increase in total remuneration.
- Expansion of foster and community pathways.

GRSA submitted an overview and the organisational structure of the GAP team indicating an increase of full-time equivalent (FTE) positions from eight to nine and an increase in total remuneration.

The GIRI requested that GRSA provide further information on previous financial expenditure in GAP marketing and evidence that the marketing strategy is being actively implemented.

Subsequently GRSA submitted financial expenditure for each year from FY22/23 to FY25/26 showing increased GAP marketing spend year-on-year.

GRSA submitted a copy of the updated marketing strategy and examples of ‘campaign creatives’ (social media posts).

GRSA submitted Facebook posts including adopter testimonial videos and an introduction from the GAP Manager.

GRSA submitted photos and advertising from a GAP Adoption Day.

GRSA submitted collateral (billboards, campaign locations, digital advertising) from an external advertising campaign from March to April 2026.

The GIRI verified this recommendation as complete.

RECOMMENDATION 53 – COMPLETED

That GRSA cease setting GAP annual targets for rehoming greyhounds.

CONTEXT

The Ashton Report stated “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 rehoming. 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 rehoming 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.”

Further context for this recommendation can be found on pages 93 to 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 February 2026

VERIFICATION PROCESS

GRSA advised the GIRI it had ceased setting annual rehoming targets as of January 2026.

GRSA submitted Board Papers from June to September 2025 showing GAP program statistics over the last three years. The Board Papers were prepared by the GAP Manager for Board review.

GRSA submitted a Position Description for a GAP Foster and Adoption Officer, dated October 2025.

GRSA submitted a copy of its Strategic Plan 2025 – 2027.

The GIRI observed that none of these documents referred to annual GAP rehoming targets.

The GIRI requested additional information regarding documentation that referred to previous annual rehoming targets so it could be evidenced that GRSA had “ceased” setting targets.

GRSA subsequently provided GAP reports submitted to its Board in March and June 2023, referring to a previous annual rehoming target.

The GIRI was satisfied with the new information provided and verified the recommendation as complete.

RECOMMENDATION 54 – COMPLETED

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

CONTEXT

This recommendation should be read in conjunction with Recommendation GRSA 17, Recommendation RSPCA 14 and Recommendation AJP 9.

The Ashton Report noted “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.”

Further context for this recommendation can be found on pages 93 to 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

4 March 2026

VERIFICATION PROCESS

GRSA submitted a Board Decision Paper from the August 2025 meeting including a spreadsheet with details of an in-person audit undertaken by the GRSA welfare team of every registered property in SA to determine where greyhounds are placed or housed. The audit also included fostered and retired dogs.

The GIRI noted the spreadsheet was an audit on the number of dogs at each registered property, while the Ashton Report expressed the need to conduct the audit to determine where all greyhounds are placed or housed.

The GIRI requested GRSA submit a full audit of all dogs (each named) and where they reside (differentiating between racing and non-racing dogs), and evidence this has been published publicly.

GRSA subsequently re-submitted the audit spreadsheet with the requested information now added. This included names of dogs, status and microchip numbers amongst other details.

GRSA advised a redacted version of the audit spreadsheet (redacting identifying participant details) was publicly accessible on the GRSA website. The GIRI accessed a copy of the spreadsheet under the heading of ‘Retired and Non-Raced Audit 2025’.

The GIRI verified this recommendation as complete.

RECOMMENDATION 55 – COMPLETED

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.

CONTEXT

Recommendation 55 should be read in conjunction with Recommendation AJP 8.

The Ashton Report noted “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.”

Further context for this recommendation can be found on pages 93 to 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

7 July 2026

VERIFICATION PROCESS

GRSA advised how it determined the numbers for the interstate transfer cap and breeding cap (Recommendation 55 and Recommendation AJP 8) by analysing racing population data (starters, race meetings, average starts, retirement and rehoming data, interstate greyhound data) used to determine the optimum number of unique starters per financial year.

GRSA explained how that figure was the basis for establishing a cap of 900 interstate-bred dogs. GRSA explained that enforcement would be measured through OzChase, monitored internally, reported monthly to the GRSA Board and also published to the industry.

GRSA submitted a ‘Transfer and Breeding Cap Modelling’ spreadsheet, providing historical analysis of breeding data, utilisation rates and interstate transfers from 2019 to 2025.

GRSA submitted a paper used to determine future modelling of annual caps (breeding and interstate transfers).

GRSA submitted an extract from its June 2026 Board Minutes showing discussion of the progress of this recommendation.

The GIRI requested GRSA provide further information regarding:

- How the cap would be introduced
- When the cap will be introduced or commence
- How the cap will be communicated to the industry

GRSA subsequently provided responses including that the cap would commence on 1 July 2026 and would be communicated to the industry shortly thereafter.

On 7 July 2026 GRSA released a public statement on its website confirming the new population management framework which detailed the new interstate transfer cap.

The GIRI verified this recommendation as complete.

COMMENTARY

The GIRI notes the recommendation required GRSA to consider introducing an interstate transfer cap however GRSA took action to effectively implement a cap on the interstate transfer of greyhounds.

RECOMMENDATION 56 – COMPLETED

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.

CONTEXT

Recommendation 56 is a recommendation for which the Government is responsible.

The Point of Consumption Tax (POCT) or the Betting Operations Tax was introduced in 2017 and is applied at a rate of 15 per cent of the net state wagering revenue of betting operators offering services in South Australia, regardless of the jurisdiction in which the operator is registered.

The three racing codes (Racing SA, GRSA and HRSA) are then provided 20 per cent return of the POCT annually as a grant paid by the State Government. This is distributed amongst the codes based on their market share.

The Ashton Report noted “...the amount of Point of Consumption Tax (POCT) on gambling retained by the industry in South Australia is also the lowest in the country.”

“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.”

The Ashton Report provided the table below as a comparison of POCT rates between jurisdictions.

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	\$37.5	\$6.8

Further context for this recommendation can be found on page 96 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

26 August 2025

VERIFICATION PROCESS

In August 2025 the South Australian Treasurer submitted the Government’s analysis of providing an increased share of the POCT to GRSA.

Following analysis, the Treasurer determined that “In recognition that an increased allocation of tax revenue would be inequitable to the other industry codes and the recent doubling of grant funding support to the industry, an increased share of betting operations tax to GRSA is not recommended at this stage.”

The GIRI confirmed the Government had undertaken an analysis of the appropriateness of providing an increased share of the POCT to GRSA and verified the recommendation as complete.

RECOMMENDATION 57 – COMPLETED

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.

CONTEXT

Recommendation 57 is a recommendation for which the Government is responsible.

The Ashton Report recommended “...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.”

Further context for this recommendation can be found on page 98 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

7 July 2026

VERIFICATION PROCESS

This recommendation has been considered in parts.

1. Establishing the role of GIRI.

Mr Sal Perna AM was appointed as the GIRI and commenced his duties on 8 July 2024. The Ashton Report set out the roles and responsibilities of the GIRI. The GIRI was based out of the Office for Recreation, Sport and Racing (ORSR) and his work was supported by two 0.5 FTE staff from ORSR.

The *Greyhound Industry Reform Inspector Act 2024* (the GIRI Act) (proclaimed on 27 February 2025) also prescribed certain functions of the role. Relevant sections are included below.

4 - Greyhound Industry Reform Inspector

1. *There will be a Greyhound Industry Reform Inspector (the Inspector).*
2. *The Inspector will be a person employed in the Public Service of the State.*
3. *The Inspector -*
 - a. *must be independent of the controlling authority and not involved in the greyhound racing industry; and*
 - b. *must not have been involved in the Report; and*
 - c. *must not accept any office or role relating to greyhound racing in this or another jurisdiction.*

5 - Functions of Inspector

1. *The Inspector has the following functions:*
 - a. *to oversee and assess the implementation of the Report recommendations by the controlling authority;*
 - b. *to receive reports from the controlling authority on matters relating to integrity and welfare, at a frequency to be determined by the Inspector and in accordance with any requirements prescribed by the regulations;*
 - c. *to facilitate collaboration between the controlling authority and the Minister in implementing reforms;*
 - d. *to gather information relating to greyhound racing and the racing controlling authority;*
 - e. *to provide reports on any aspect of the Inspector's functions at the request of the Minister or on the Inspector's own initiative;*
 - f. *to prepare and provide the report required under section 18 to the Minister which outlines their assessment of the reform progress;*
 - g. *any other functions conferred on the Inspector by or under this or any other Act or by the Minister.*
2. *The Inspector is not subject to Ministerial direction in respect of the exercise of their functions under this Act.*

6 - Staff

The Inspector's staff consists of the authorised officers and any Public Service employees assigned to assist the Inspector in the administration and enforcement of this Act.

2. GIRI to have unfettered access to GRSA.

The GIRI Act also provided the GIRI with have powers to access information from GRSA.

8 - Power to require information

1. *The Inspector or an authorised officer may, by notice in writing, require the controlling authority, or an officer or employee of the controlling authority, to provide them such information or documents, or classes of information or documents, as may be specified in the notice (being information or documents*

in the possession of the person or body that is reasonably required for the performance of the Inspector's functions).

2. *The person or body required to provide information or documents under subsection (1) must give the specified information or documents to the Inspector within the period specified in the notice (which must be reasonable).*
3. *The Inspector or an authorised officer may, for the purposes of subsection (1), by notice in writing served on a person, require the person to attend at a specified time and place.*
4. *A person who –*
 - a. *refuses or fails to comply with a notice under subsection (1); or*
 - b. *without reasonable excuse, refuses or fails to attend at the time and place specified in a notice under subsection (3) (or some other time and place allowed by an authorised officer),*

is guilty of an offence.

Maximum penalty: \$10,000.
5. *For the purposes of this section, a person is an employee of the controlling authority if the person carries out work, or has previously carried out work –*
 - a. *under a contract for services for the controlling authority; or*
 - b. *as a volunteer for the controlling authority; or*
 - c. *of a prescribed kind, or in prescribed circumstances, for the controlling authority.*

9 - Powers to enter and inspect etc

1. *Subject to this section, the Inspector or an authorised officer may, as reasonably required for the administration and enforcement of this Act–*
 - a. *enter or, on the authority of a warrant issued by a magistrate in accordance with subsection (4), break into premises, using only such force as is reasonably necessary for the purpose; and*
 - b. *inspect or search the place or anything in the place; and*
 - c. *require any person in the place to –*
 - i. *produce any documents that are in the person's custody or control; and*
 - ii. *answer any questions; and*
 - iii. *facilitate the examination of any systems or procedures used; and*
 - d. *examine, copy or take extracts from documents or records so produced or require a person to provide a copy of any such document or record; and*
 - e. *retain any documents produced for so long as is reasonably necessary for the purpose of copying or taking extracts from them; and*
 - f. *enter or, on the authority of a warrant issued by a magistrate in accordance with subsection (4), break into any vehicle or vessel, using only such force as is reasonably necessary for the purpose, and search the vehicle or vessel; and*
 - g. *take photographs, films or audio or visual recordings; and*
 - h. *require a person reasonably suspected of having knowledge of matters in respect of which information is reasonably required for the performance of functions under this Act to answer questions in relation to those matters; and*
 - i. *give such directions as are reasonably necessary for, or as are incidental to, the effective exercise of any powers under this Part.*
2. *The Inspector or an authorised officer may only exercise the power of entry under this section in respect of premises being used in the course of, or in relation to, greyhound racing.*

3. *The Inspector or an authorised officer may not exercise the power of entry under subsection (2) in relation to premises that are not owned or operated by the controlling authority except on the authority of a warrant issued by a magistrate in accordance with subsection (4).*
4. *A magistrate cannot issue a warrant under this section unless satisfied that the warrant is reasonably required in the circumstances.*
5. *The Inspector or an authorised officer may, in exercising powers under this section, be accompanied by such assistants as are reasonably necessary for the purpose.*

The GIRI did not need to exercise these powers during the reform period as GRSA met all requests for access to people, information, documents and sites.

3. GIRI to be entirely independent.

The GIRI was wholly independent and had no connections to the racing industry in South Australia.

The GIRI had no involvement in the Ashton Report.

4. GIRI to establish a Greyhound Racing Reforms Advisory Group (GRRAG).

The GRRAG was established in September 2024, meeting for the first time that month.

The GRRAG consisted of:

- David Sharpe OAM APM
- Alan Clayton PSM
- Dr Michelle Ledger BVSc MSc (IAWEL) MANZCVS (Animal Welfare)
- Zane Turner

The GRRAG members provided extensive expertise in the fields of animal welfare, gambling regulation, greyhound industry and sports regulation.

The GRRAG members were consulted (either individually or collectively) regularly throughout the reform period.

5. The General Manager Integrity and Welfare at GRSA should have a dual reporting line to the GIRI.

This requirement of Recommendation 57 should be read in conjunction with Recommendation 30, which was verified on 29 October 2025.

The GIRI formally met with the General Manager Integrity and Welfare, GRSA on a monthly basis since the General Manager's appointment in October 2025. Ad hoc meetings and site visits were also conducted where required.

The GIRI had a direct line of communication with the General Manager throughout the reporting period, including on matters relating to Recommendation 38.

6. GIRI to determine frequency and mode of reporting from GRSA.

It was originally agreed that GRSA would provide monthly progress reports and have monthly meetings with the GIRI. This was later changed to ad hoc meetings as required and written submissions by GRSA as recommendations were completed. The GIRI had an open line of communication with both the GRSA Executive and the Board.

7. GIRI to report regularly to the Minister for Racing.

Throughout the reporting period the GIRI reported to three different Ministers as they each took carriage of the Recreation, Sport and Racing portfolio – Hon Katrine Hildyard MP (8 July 2024 – 29 January 2025), Hon Emily Bourke MLC (29 January 2025 – 19 September 2025) and Hon Rhiannon Pearce MP (19 September 2025 – present).

The GIRI provided monthly written reports to each Minister updating them on progress of the recommendations and significant milestones.

The GIRI met regularly in-person with each Minister. The GIRI had open lines of communication with each Minister and their offices.

8. GIRI to provide a final report.

This section of the recommendation will be achieved when the final report is submitted to the Minister.

The GIRI Act prescribes the following regarding the final report:

18 – Final Report

- 1. The Inspector must submit to the Minister a final report on the implementation of the Report recommendations by the controlling authority before the second anniversary of the commencement of this section, or such later date as the Minister may allow.*
- 2. The Minister must, within 12 sitting days after receiving a final report under this section, cause a copy of the final report to be laid before both Houses of Parliament.*

This recommendation is verified as complete (subject to the finalisation of this report).

RECOMMENDATION 58 – COMPLETED

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).

CONTEXT

Recommendation 58 was not captured within the ‘Consolidated Report Recommendations’ section from pages 12 to 21 of the Ashton Report and was only included within the body of the report on page 34. Although this recommendation was unnumbered by the Ashton Report, the GIRI considered this as Recommendation 58.

Recommendation 58 stems from the 2017 McGrathNicol report.

Recommendation 58 should be read in conjunction with Recommendation RSPCA 22.

The Ashton Report noted “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.”

Further context for this recommendation can be found on page 34 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

2 July 2025

VERIFICATION PROCESS

GRSA submitted its updated Board Charter showing amendments to the ‘Composition and Structure of Board’ section outlining the requirement that at least one Director is to have a background in animal welfare and at least one Director is to have a background in integrity (noting the same person could hold both roles). The Board Charter is also available publicly on the GRSA website.

The Board Charter amendments read as follows:

Composition and Structure of the Board

The composition of the Board will be as follows:

- *one Director must have experience in the greyhound racing industry and may be a Licensed Person.*

All other Directors must be independent of the greyhound racing industry as referenced in Clause 37 of the GRSA Constitution. Of these Directors:

- *at least one must have qualifications and experience in financial management;*
- *at least one must have qualifications in marketing;*
- *at least one must have qualifications and experience in carrying on a business;*
- *at least one must have qualifications and experience as a legal practitioner;*
- *at least one must have qualifications and experience in animal welfare;*
- *at least one must have qualifications and experience in integrity; and*
- *at least one must have qualifications and/or experience determined by the Directors’ Selection Panel to be necessary to address existing and/or emerging governance and integrity issues, relevant to the Company.*

Consistent with Clause 37.1 of the GRSA Constitution, a single Independent Director may satisfy more than one of the qualification and experience requirements outlined above.

GRSA submitted its updated Constitution showing amendments to Part 5, Section 37 outlining the requirement that at least one Director is to have a background in animal welfare and at least one Director is to have a background in integrity (noting the same person could hold both roles). The Constitution is also available publicly on the GRSA website.

The amendment to the Constitution reads as follows:

37. Qualification to be a director

37.1 There must be at least 4 Independent Directors, who must collectively hold the qualifications and experience as follows:...

- e. at least one Independent Director must have qualifications and experience in animal welfare;*
- f. at least one Independent Director must have qualifications and experience in integrity;*

37.2 For the purposes of clause 37.1, a single Independent Director may satisfy more than one of the qualification and experience requirements set out in clauses 37.1(a) to (g).

GRSA submitted the Minutes from its Annual General Meeting (AGM) held in June 2025 evidencing company members had voted in favour of amending the Constitution to include the updates.

The GIRI viewed the GSRA Board Charter and Constitution and confirmed the requirements to have Board Directors with experience in animal welfare and integrity are now included within these documents. The GIRI verified this recommendation as complete.

RECOMMENDATION GRSA 1 – COMPLETED

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.

CONTEXT

Recommendation GRSA 1 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

Recommendation GRSA 1 should be read in conjunction with Recommendation GRSA 15. Recommendation GRSA 1 and Recommendation GRSA 15 both have the objective of creating a new approach to licencing (including education and training). The difference between the two is that Recommendation GRSA 1 is aiming at working with other state controlling bodies while Recommendation GRSA 15 is aimed at working with Greyhounds Australasia (GA). Both recommendations are aimed at developing a standardised and unified licencing framework.

Other recommendations which address improving training and education include Recommendation 25.9 and Recommendation RSPCA 24.

RECOMMENDATION VERIFICATION DATE

26 June 2026

VERIFICATION PROCESS

GRSA submitted emails between GRSA and GA evidencing discussions with controlling bodies.

GRSA submitted a spreadsheet containing a comparison study between each Australian state and territory controlling body and New Zealand. This included IT licencing systems, licence categories, system owners, numerous categories of industry participants and training and education requirements in each jurisdiction.

GRSA submitted the ‘SA Greyhound Industry Participant Licence Framework’ document providing a framework for assessing, approving, monitoring and regulating industry participants who apply for, hold or are required to hold a licence in greyhound racing.

GRSA submitted a June 2026 Circular Board Resolution Decision Paper approving the Framework.

GRSA advised it had also:

- utilised NSW and VIC training material to develop GRSA training content
- attempted to work towards a unified licencing system but was unable to achieve this due to state-based processes and differing statutory requirements at a jurisdictional level
- integrated the new Framework with the new GRSA education requirements
- communicated the new Framework to the industry via Facebook.

The GIRI reviewed the documents and confirmed GRSA had worked 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.

The GIRI also noted that Recommendation GRSA 1 required GRSA to “work in partnership with controlling bodies”. The GIRI determined there was sufficient evidence to indicate that this work had occurred.

The GIRI verified this recommendation as complete.

RECOMMENDATION GRSA 3 – COMPLETED

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.

CONTEXT

Recommendation GRSA 3 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

Recommendation GRSA 3 is a recommendation for which the Government is responsible.

RECOMMENDATION VERIFICATION DATE

1 July 2026

VERIFICATION PROCESS

The GRI considered correspondence from the Minister for Consumer and Business Affairs who advised that the Government considered legislative amendment to Section 36 of the *Authorised Betting Operations Act 2000* unnecessary.

In July 2026 GRSA advised the GRI that it had introduced an amendment to the Local Rules. The new Local Rule 132A reads:

132A Requirement of an On Track Veterinarian

(1) The Controlling Body must not conduct a meeting unless there is a veterinarian, registered under the Veterinary Practice Act 2023 (SA), officiating at the meeting.

The GRI noted Recommendation GRSA 3 was a Government recommendation that had not been actioned.

The GRI observed that GRSA had undertaken to achieve the same practical outcome (making it mandatory to have a veterinarian at each race meeting) by introducing a Local Rule, rather than by legislative amendment.

The GRI noted that, while the relevant accountable body for this recommendation did not action the recommendation, GRSA (which originally submitted the recommendation) had taken steps to implement the recommendation and ensure the intent of the recommendation was met.

The GRI verified this recommendation as complete.

RECOMMENDATION GRSA 4 – COMPLETED

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.

CONTEXT

Recommendation GRSA 4 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

Dogs And Cats Online (DACO) is South Australia's central database for pet registration, microchipping records, breeder information and council compliance management. DACO is managed by the Dog and Cat Management Board (DCMB) within the Department for Environment and Water.

RECOMMENDATION VERIFICATION DATE

28 October 2025

VERIFICATION PROCESS

GRSA submitted Agendas and Minutes from two meetings held between GRSA and DCMB in May and August 2025.

GRSA submitted a letter to the GIRI detailing the embedding of the collaboration between GRSA and DCMB. GRSA advised a further meeting between GRSA and DCMB had taken place in September 2025. GRSA advised a workshop between GRSA and DCMB was being planned for November 2025. GRSA advised a Memorandum of Understanding (MOU) between GRSA and DCMB was being drafted.

The GIRI reviewed the documentation provided and requested that GRSA provide a copy of the draft MOU.

GRSA subsequently submitted a copy of the draft MOU.

The GIRI noted the draft MOU was a step towards formalising the relationship between GRSA and DCMB and verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested that GRSA provide an update on collaboration with DCMB.

GRSA advised it continued to engage with DCMB and provided a copy of an email from DCMB to GRSA which confirmed that GRSA staff had access to DACO for the purpose of updating racing greyhound records.

RECOMMENDATION GRSA 5 – COMPLETED

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.

CONTEXT

Recommendation GRSA 5 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

Dogs And Cats Online (DACO) is South Australia's central database for pet registration, microchipping records, breeder information and council compliance management. DACO is managed by the Dog and Cat Management Board (DCMB) under the Department for Environment and Water.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted its revised 'Animal Welfare Policy 2021'. The update to the policy reads:

LOCAL COUNCIL OBLIGATIONS

ORDER

All greyhounds under the jurisdiction of GRSA, including those kept for racing and breeding purposes, must be registered with the Dog and Cat Management Board (DCMB). This requirement applies to both newly acquired greyhounds and those already approved for breeding.

Owners, including breeders, must complete the registration process through the DCMB's established procedures. This includes the submission of necessary documentation and adherence to any additional requirements stipulated by the DCMB.

Proof of registration with the DCMB must be presented to GRSA upon request and during any inspections or audits conducted as part of GRSA's ongoing welfare and compliance checks.

Failure to comply with the mandatory registration requirement may result in disciplinary action, including fines, suspension of racing or breeding privileges, or any other sanctions deemed appropriate by GRSA.

ORDER

All greyhounds (registered and retired) on a registered facility are to be registered pursuant to the Dog and Cat Management Act 1995 (SA), with the local council. This may be in the form of a permit that allows participants to house a certain number of greyhounds on a property or a registration (a coloured tag) for each individual greyhound. Participants are to provide GRSA with proof of registration (paperwork or the coloured tag) upon kennel inspections.

GRSA submitted its April 2024 Board Minutes showing in-principle approval of the updated Animal Welfare Policy 2021.

The GIRI confirmed the update to the policy and requested that GRSA provide a copy of the Local Rules showing the amendment that explicitly states that all greyhounds, including those intended for breeding, must be registered with the DCMB.

GRSA subsequently provided an updated copy of the Local Rules, with the new Local Rule reflecting the requirements of the recommendation.

The new Local Rule reads:

Division 7 Registration of greyhounds

34 (LR28) Greyhound registration (within South Australia or outside South Australia and purchased by South Australia resident)

3) Greyhounds domiciled in South Australia (including those within South Australia or transferred to South Australia from another state and including greyhounds intended for breeding) must be registered in accordance with section 33 of the Dog and Cat Management Act 1995 (SA).

GRSA submitted its October 2024 Board Minutes showing approval of the proposed amendment to the Local Rules.

The GIRI visited the GRSA website and observed the Local Rules and the Animal Welfare Policy, ensuring they are accessible to the public and industry.

The GIRI verified this recommendation as complete.

RECOMMENDATION GRSA 8 – COMPLETED

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.

CONTEXT

Recommendation GRSA 8 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

RECOMMENDATION VERIFICATION DATE

1 July 2026

VERIFICATION PROCESS

GRSA submitted a February 2026 Board Paper approved by its Board titled ‘Procurement of Clue Case Management and Intelligence System’ approving the purchase of Clue and exempting it from the procurement process. GRSA advised it had foregone the procurement process as Greyhound Racing Victoria (GRV) had recently undergone the same process and provided all relevant information.

GRSA submitted a June 2026 Circular Board Resolution approving the implementation of Clue CMS as GRSA’s dedicated complaint, case management and intelligence system.

GRSA submitted evidence of communications between GRSA and GRV showing discussion of the operation, procurement and evaluation of the Clue system.

GRSA submitted ‘Terms of Reference for the National Partners – Integrity and Welfare Forum (NPIF)’ listing all state controlling bodies as participating organisations. The objectives of the NPIF are to:

- Discuss and review emerging integrity issues across jurisdictions.
- Share intelligence, trends, and risks relating to racing, welfare, and compliance.
- Coordinate responses to integrity-related matters that have national significance.
- Promote best practice and continuous improvement in integrity operations.

GRSA submitted Agendas and Minutes from NPIF meetings held in December 2025, February 2026 and April 2026.

GRSA also advised the GIRI that Clue would operate alongside the new Greyhound Traceability System (GTS) and both would go live on 19 June 2026.

The GIRI reviewed the information received and asked for an in-person demonstration of the functionality of the Clue system.

The GIRI attended GRSA and received an in-person demonstration of the system by GRSA.

GRSA submitted further information advising that Clue had successfully gone live on 29 June 2026 and was in operation.

GRSA subsequently submitted an email received from the software administrator Clue Software confirming the system was live.

The GIRI verified this recommendation as complete.

RECOMMENDATION GRSA 9 – COMPLETED

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

CONTEXT

Recommendation GRSA 9 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

This recommendation should be read in conjunction with Recommendation 16 and Recommendation GRSA 9 regarding complaint handling.

Safe2Say is an anonymous integrity hotline developed by Crime Stoppers WA.

The Ashton Report advised “...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...”

Further context regarding this recommendation is included on pages 42 to 44 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

14 January 2025

VERIFICATION PROCESS

GRSA provided a signed software licence agreement for use of the Safe2Say system executed between GRSA and Crimestoppers WA.

GRSA submitted its December 2024 Board Minutes evidencing Board approval of the implementation of Safe2Say.

GRSA submitted the December 2024 edition of Kennel Capers including an article on the commencement of Safe2Say, showing communication to the industry of the new Safe2Say system.

GRSA submitted an example of an automated email receipt from a mock Safe2Say form submission.

The GIRI accessed the ‘Contact GRSA’ webpage and submitted a mock enquiry through Safe2Say.

The GIRI noted the Board approval and communication to the industry and that the new Safe2Say system was in use on the GRSA website.

The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In July 2026 the GIRI re-accessed the ‘Contact GRSA’ webpage and confirmed the Safe2Say system was still in use.

RECOMMENDATION GRSA 13 – NOT COMPLETED

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

CONTEXT

Recommendation GRSA 13 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

Recommendation GRSA 13 can be read alongside Recommendation GRSA 14 as part of GRSA's plans for alternative fostering and adoption processes.

The Ashton Report noted “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...”

At the time of the Ashton Review, GRSA advised 16 GAP kennels were in use at Mobilong Prison as well as eight kennels at Adelaide Women's Prison. GRSA also advised of its plans to expand the program to Mount Gambier Prison.

Further context regarding this recommendation is included on pages 93 to 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

Not considered as complete.

VERIFICATION PROCESS

The GIRI observed the operations of the GAP program within prisons by visiting Mobilong Prison (August 2024) and Adelaide Women's Prison (February 2026).

GRSA submitted a document titled 'Mount Gambier Prison Discussion Document' outlining the responsibilities of GRSA and Mount Gambier Prison when establishing a GAP program within Mount Gambier Prison.

GRSA submitted an email from Mount Gambier Prison to GRSA indicating support for the establishment of the GAP program at Mount Gambier Prison.

GRSA submitted a document titled 'GAP Pre-Release Project Proposal' discussing plans to establish the GAP program at the Adelaide Pre-Release Centre.

GRSA submitted the GAP prison program training document – 'Calm Foundations – Greyhound Foundation Training Program'.

In April 2026 the GIRI advised GRSA that, while there was evidence of initial progress and planning of the development of the GAP prison program at Adelaide Pre-Release Centre and Mount Gambier Prison, this recommendation cannot be considered as complete as the program was not yet operational at either prison.

GRSA subsequently submitted concept designs of kennelling plans for Adelaide Pre-Release Centre.

GRSA submitted an email from Mount Gambier Prison to GRSA indicating commitment to the GAP program, subject to approval from the Department of Correctional Services.

GRSA advised greyhounds would be transferred and housed within Adelaide Pre-Release Centre by early July 2026.

The GIRI witnessed the GAP program at Adelaide Pre-Release Centre in July 2026, observing two kennels in operation.

ASSESSMENT

The GIRI noted that, while the GAP program had been expanded generally (to include Adelaide Pre-Release Centre), at the conclusion of the reform period it had not been expanded to Mount Gambier Prison as prescribed in the wording of the recommendation.

RECOMMENDATION GRSA 14 – COMPLETED

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.

CONTEXT

Recommendation GRSA 14 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

Recommendation GRSA 14 can be read alongside Recommendation GRSA 13 as part of GRSA's plans for alternative fostering and adoption processes.

Further context regarding this recommendation is included on pages 93 to 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

5 March 2026

VERIFICATION PROCESS

GRSA submitted a signed 'Greyhound Rehoming Agreement' between GRSA and Bridging the Gap Greyhound Rehoming SA (BTG) for BTG to rehome retired racing greyhounds on behalf of GRSA. BTG is a private greyhound rehoming group.

GRSA submitted an August 2025 Board Paper advising the Board of a formalised partnership with BTG.

The GIRI reviewed the information provided and noted that the recommendation requires GRSA to explore alternative options including non-GAP SA agencies. The GIRI endorsed that the BTG agreement indicated GRSA had explored one alternative option, however, there was no indication that there has been an enhancement to fostering and adoption programs through pursuing any other options.

The GIRI requested that GRSA provide further information regarding rehoming options.

GRSA subsequently submitted a proposal between GRSA and the Police Association of SA (PASA) formalising the 'Greyhounds as Mates' program. GRSA submitted emails between GRSA and the PASA agreeing to the content of the proposal.

GRSA submitted an extract from 'The National Firefighter' magazine's 2025 Summer Edition with an article on a partnership between GRSA, Greyhounds Australasia, the PASA and the United Firefighters Union of SA (UFUSA) providing emergency service workers priority access to retired racing greyhounds.

GRSA submitted a 'Partnership Proposal' between GAP SA and TAFE SA to support improved rehoming outcomes for retired racing greyhounds and provide hands-on learning opportunities for students.

GRSA submitted a copy of communication between GRSA and TAFE SA agreeing in-principle to the partnership program framework.

The GIRI accepted GRSA has "evolved" and "improved" by further exploring alternative rehoming options with organisations including PASA, UFUSA, TAFE SA and BTG.

The GIRI verified this recommendation as complete.

RECOMMENDATION GRSA 15 – COMPLETED

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.

CONTEXT

Recommendation GRSA 15 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

Recommendation GRSA 15 should be read in conjunction with Recommendation GRSA 1. Recommendation GRSA 1 and Recommendation GRSA 15 both have the objective of creating a new approach to licencing (including education and training). The difference between the two is that Recommendation GRSA 1 is aiming at working with other state controlling bodies while Recommendation GRSA 15 is aimed at working with Greyhounds Australasia (GA). Both recommendations are aimed at developing a standardised and unified licencing framework.

Other recommendations which address improving training and education include Recommendation 25.9 and Recommendation RSPCA 24.

RECOMMENDATION VERIFICATION DATE

26 June 2026

VERIFICATION PROCESS

GRSA submitted emails between GRSA and GA, with GA advising that there is presently “no appetite to unify greyhound licencing at a national level” citing state-based processes and differing statutory requirements at a jurisdictional level.

GRSA submitted a spreadsheet containing a comparison study between each Australian state and territory controlling body and New Zealand. This included IT licencing systems, licence categories, system owners, numerous categories of industry participants and training and education requirements in each jurisdiction.

GRSA submitted the ‘SA Greyhound Industry Participant Licence Framework’ document providing a framework for assessing, approving, monitoring and regulating industry participants who apply for, hold or are required to hold a licence in greyhound racing.

GRSA submitted a June 2026 Board Paper by Circular Board Resolution approving the ‘SA Greyhound Industry Participant Licence Framework’.

GRSA advised it had also:

- utilised NSW and VIC training material to develop GRSA training content.
- integrated the new Framework with the new GRSA education requirements.
- communicated the new Framework to the industry via Facebook.

The GIRI reviewed the documents and confirmed GRSA had worked to create a unified and standardised approach to licencing within the greyhound industry including defining the necessary education, training, and skill requirements for different roles held by licensees. The GIRI also noted that Recommendation GRSA 15 required GRSA to work “with Greyhounds Australasia, as facilitator with other Controlling Bodies”. The GIRI determined there was sufficient evidence to indicate that this work had occurred.

The GIRI verified this recommendation as complete.

RECOMMENDATION GRSA 16 – COMPLETED

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

CONTEXT

Recommendation GRSA 16 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report. Penalty Guidelines are used as an aid to set consistent and proportionate penalties for offences of a comparable nature.

RECOMMENDATION VERIFICATION DATE

12 February 2026

VERIFICATION PROCESS

GRSA submitted an extract from its December 2025 Board Minutes approving the implementation of the revised Penalty Guidelines.

GRSA submitted a copy of the revised Penalty Guidelines, effective 1 January 2026. GRSA advised the Guidelines were revised using the NSW Greyhound Welfare and Integrity Commission (GWIC) Penalty Guidelines as a basis, with additional provisions made to cover a broad range of breaches relevant to GRSA's regulatory and welfare framework.

GRSA submitted an extract from the January 2026 edition of Kennel Capers to evidence communication to the industry of implementation of the revised Guidelines from 1 January 2026.

The GIRI visited the GRSA website and accessed the revised Penalty Guidelines.

The GIRI noted that GRSA had not provided a copy of the previous Penalty Guidelines. As the recommendation requires GRSA to broaden its minimum guidelines, the GIRI requested GRSA provide a copy of the previous Guidelines to enable comparison and provide clarity as to what changes had been made.

GRSA subsequently submitted a copy of the previous Penalty Guidelines, dated February 2023.

The GIRI undertook a comparison of the January 2026 Penalty Guidelines with the February 2023 Penalty Guidelines and found the following:

- Expanded scope and structure in the 2026 version. The 2023 version largely centred on prohibited substances and welfare.
- New offence groupings introducing four categories (welfare; compliance; prohibited substances; behaviour) with detailed tables and listed offences not included in 2023.
- Extension of cross-category repeat offending rule (i.e. an aggravation principle that prior breaches in any category can increase penalties)
- Introduction of behaviour and compliance application e.g. significant additions of conduct detrimental to racing, attempting to influence officials, corrupt conduct and lay betting.
- Introduction of a suspended penalties policy adding rules on when suspensions can be imposed and how new offences during suspension are dealt with (cumulative sentencing).

Through this comparison the GIRI was able to confirm that the Penalty Guidelines had been broadened as intended.

The GIRI verified this recommendation as complete.

RECOMMENDATION GRSA 17 – COMPLETED

GRSA implement the eTrac greyhound traceability system.

CONTEXT

Recommendation GRSA 17 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

Recommendation GRSA 17 should be read in conjunction with Recommendation RSPCA 14 and Recommendation AJP 9 as all relate to the implementation of a greyhound traceability system.

These recommendations essentially require GRSA to implement a traceability system, albeit each uses slightly different terminology:

- Recommendation GRSA 17 – “...the eTrac greyhound traceability system.”
- Recommendation RSPCA 14 – “...birth to death traceability system.”
- Recommendation AJP 9 – “...whole-of-life tracking to monitor the welfare of greyhounds in the industry.”

The Ashton Report noted that 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.”

Further context for this recommendation can be found on page 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

26 June 2026

VERIFICATION PROCESS

In January 2026 GRSA advised it had been in communication with GWIC since November 2023 regarding eTrac being implemented in SA. However, GRSA advised that GWIC did not have authority to commercialise or supply eTrac services outside New South Wales. The proposed arrangement required approval from the New South Wales Government, and that approval was not obtained within a timeframe to allow GRSA to meet the Ashton Report implementation program.

GRSA therefore progressed with the development of an alternative system, the Greyhound Traceability System (GTS), designed to deliver the same traceability, welfare and regulatory outcomes as eTrac.

GRSA submitted a Capability Statement for the GTS.

In January 2026, the GIRI advised GRSA that if the GTS replicated the functionality of eTrac, its development and implementation would satisfy Recommendations GRSA 17, RSPCA 14 and AJP 9.

The GIRI advised GRSA that the GTS should include the following capabilities raised in Recommendation GRSA 17, Recommendation RSPCA 14 and Recommendation AJP 9:

- Tracking from birth to death
- Tracking of circumstances, location, ownership, and fate of individual greyhounds throughout their lifecycles
- Tracking to monitor the welfare of each greyhound
- Tracking including beyond retirement
- Transferring of manual processes to automated processes
- An intuitive system
- Tracking of import/export of greyhounds
- Data recording breeding/supply
- Current ‘whereabouts’ of each greyhound.

GRSA subsequently advised that the GTS had been developed and was fully operational for GRSA staff as of 1 April 2026. The system supported real-time capture of greyhound lifecycle events across property inspections and race meetings, and provided improved visibility of greyhound location, status and movement. The GTS was integrated with OzChase and combined with historical datasets to create a centralised and controlled system to support whole-of-life traceability.

The GRI noted the progress update and advised GRSA he would require an in-person demonstration of the new system.

GRSA subsequently submitted an extract from its December 2025 Board Minutes showing Board approval for Evolving Solutions to build and manage the GTS.

GRSA submitted a January 2026 Decision Paper by Circular Board Resolution approving development of the GTS and the appointment of Evolving Solutions to build and manage the GTS.

GRSA submitted a GTS Proactive Disclosure Statment (*sic*) of a GRSA Board Director detailing their association with Evolving Solutions.

GRSA submitted Software Licence Contracts between GRSA and Evolving Solutions. The documentation includes a Software Maintenance Agreement, Maintenance Agreement Schedule and Facilities Management Agreement and an Addendum for GTS Capability, Acceptance and Availability.

The GRI reviewed the documents provided and requested more information on the procurement process.

GRSA subsequently submitted further information and clarification to the GRI regarding the procurement of GTS.

GRSA submitted a ‘Flowbuilders Onboarding Compatibility Brief’ outlining the compatibility of GRSA’s greyhound welfare and compliance processes to the GTS.

GRSA submitted a ‘GTS Implementation Report’ outlining the steps involved to implement the GTS to provide traceability from birth to death of all greyhounds that reside or had resided in SA.

In June 2026 the GRI received an in-person demonstration of the GTS at the GRSA office guided by GRSA staff. GRSA advised the public interface of GTS was not yet live. The GRI advised GRSA he would need to be advised when the GTS was made publicly accessible on the GRSA website.

The GRI also requested GRSA provide evidence of communication to industry of the establishment of the GTS.

In June 2026 GRSA advised the GRI the GTS public interface was now live.

GRSA subsequently submitted an all-staff email advising of the new GTS.

GRSA submitted a screenshot of a GRSA Facebook post addressed to “GRSA Trainers and Breeders” advising participants of the new GTS.

GRSA submitted a screenshot of the GRSA website showing the new tab ‘Greyhound Traceability’.

Once the GTS public interface was confirmed as live, the GRI undertook a reconciliation of randomly selected greyhounds to confirm full capability. The GRI found that several greyhounds did not appear when searched. The GRI advised GRSA of this discrepancy.

GRSA confirmed 100 greyhounds had not been correctly loaded into the system. GRSA advised the issue would be rectified within the next day.

The GRI was subsequently advised the issue had been rectified. The GRI conducted another random search and confirmed all greyhounds searched were now listed as required.

The GRI verified this recommendation as complete.

COMMENTARY

While the GRI acknowledges GSRA was unable to acquire eTrac as prescribed in the recommendation, the GRI has confirmed that the GTS replicates the functionality of eTrac and is satisfied that the intent of Recommendation GRSA 17 has been achieved.

RECOMMENDATION GRSA 18 – COMPLETED

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

CONTEXT

Recommendation GRSA 18 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

RECOMMENDATION VERIFICATION DATE

23 May 2025

VERIFICATION PROCESS

GRSA advised it had met with the New South Wales Greyhound Welfare and Integrity Commission (GWIC), Greyhound Racing Victoria (GRV) and Racing Victoria Limited (RVL) to assist in developing training programs.

GRSA submitted a draft training program detailing training requirements for both stewards and track curation staff.

GRSA advised that track curation staff training commenced in the last week of September 2024.

The GIRI reviewed the draft training program and provided feedback to GRSA on further content inclusions.

GRSA submitted a detailed overview of the training programs to assist stewards and racetrack curation staff to better perform their functions, with the GIRI's feedback incorporated.

GRSA submitted its March 2025 Board approval for all training, noting an annual budget had also been approved for the delivery of the training.

GRSA submitted completed training schedules for both the track staff and stewarding staff.

GRSA submitted a training record for programs already conducted with the track curation staff, with three staff attending GRV training and due to graduate in October 2025. GRSA noted a training record for stewards would also be produced when training commences in July 2025.

The GIRI noted the documentation provided and was satisfied GRSA had implemented accredited training programs. The GIRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested that GRSA provide a list of all stewards and track curation staff who have completed the training programs over the reform period and the dates they were completed.

GRSA provided evidence of track curation staff having completed a Certificate III in Racing Services through GRV. GRSA also advised track curation staff had undertaken internal training regarding the new track maintenance equipment.

GRSA provided evidence of stewarding staff having completed internal training. However, GRSA advised it now expects race-day stewards to undertake lower-level inquiries with more significant investigations to be led by the Investigative Steward instead.

GRSA advised that steward training now focuses on current role requirements including communication, conflict management, de-escalation, professional inquiry conduct and basic statement taking and writing.

GRSA advised accredited training programs (including Certificate IV in Government Investigations and Certificate II in Workplace Skills) are no longer required for stewards but may be supported by GRSA where relevant to future development of staff.

RECOMMENDATION GRSA 19 – COMPLETED

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.

CONTEXT

Recommendation GRSA 19 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted an updated Integrity and Welfare Committee (IWC) Charter including the responsibility for the IWC to:

Review reports from the Race Injury Review Panel (RIRP), for the preceding period, with the aim to detect any discernible patterns or factors that could be significant contributing factors to the significant racing injuries or deaths.

The GIRI requested that GRSA provide an IWC Agenda and Minutes showing the new standing item included within meetings. The GIRI also requested evidence of Board approval of the updated IWC Charter.

GRSA submitted a March 2024 Circular Resolution of Directors showing Board approval of the updated IWC Charter. GRSA also submitted its March 2024 Board Minutes showing Board approval of the updated IWC Charter.

GRSA submitted the Agendas and Minutes from the July 2024 and October 2024 IWC meetings showing the discussion of injury data analysis.

The GIRI was satisfied the recommendation had been implemented and verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested copies of all IWC Agendas since the initial verification of Recommendation GRSA 19.

GRSA provided the Agendas and Minutes of all IWC meetings held since October 2024.

The GIRI confirmed that this remains as a regular item at all IWC meetings.

RECOMMENDATION GRSA 20 – COMPLETED

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.

CONTEXT

Recommendation GRSA 20 is one of 14 recommendations submitted by GRSA and accepted by the Ashton Report.

RECOMMENDATION VERIFICATION DATE

24 June 2025

VERIFICATION PROCESS

GRSA submitted the 'Code of Conduct and Practice for the Greyhound Racing Sector' document and a link to where the Code of Conduct was displayed on the GRSA website.

GRSA submitted the updated 2023 Local Rules with the inclusion of new Local Rule 176A which binds all registered participants to the Code of Conduct, makes compliance a condition of ongoing participation within the industry, deems breaches of the Code as breaches of the Local Rules and enables investigation and disciplinary action under existing inquiry provisions. New Local Rule 176A states:

176A Code of conduct and practice

1) Application and Compliance

- a. *The Code of Conduct and Practice is binding on all registered participants within the greyhound racing sector, including but not limited to owners, trainers, handlers, breeders, stewards, race officials, and any other licensed persons engaged in greyhound racing activities.*
- b. *Compliance with the Code of Conduct and Practice is a mandatory condition of participation in greyhound racing and associated activities.*

2) Obligations of Participants

- a. *All participants must acknowledge and adhere to the standards, principles, and obligations outlined in the Code of Conduct and Practice.*
- b. *Any breach of the Code of Conduct and Practice shall constitute a breach of the Local Rules and may result in disciplinary action, including but not limited to fines, suspension, disqualification, or exclusion from greyhound racing activities.*

3) Enforcement and Disciplinary Measures

- a. *The Controlling Body shall have the power to investigate and impose penalties for any failure to comply with the Code of Conduct and Practice.*
- b. *Disciplinary proceedings shall be conducted in accordance with the relevant provisions of the Rules.*

4) Review and Amendments

- a. *The Code of Conduct and Practice shall be reviewed periodically to ensure alignment with industry best practices, regulatory requirements, and animal welfare standards.*
- b. *Participants must remain informed of any amendments and updated obligations arising from changes to the Code of Conduct and Practice.*

GRSA submitted its April 2025 Board approval of the Code of Conduct and new Local Rule 176A.

The GIRI reviewed the May 2025 edition of Kennel Capers and confirmed that the new Code of Conduct had been communicated to the industry.

The GRI reviewed the Code of Conduct document and noted it had been embedded into the GRSA Local Rules. The GRI was satisfied that the Code of Conduct provides the industry with guidance on animal welfare practices based on the Five Domains Model. The Code of Conduct advised this Model “provides a framework by which animal welfare can be measured and provides clarity of expectations for animal welfare and development.” The Five Domains are good nutrition, good environment, good health, appropriate behaviour and positive mental state.

The GRI verified the recommendation as complete.

RECOMMENDATION RSPCA 1 – UNABLE TO BE VERIFIED

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.

CONTEXT

Recommendation RSPCA 1 is one of 10 recommendations submitted by the RSPCA and accepted by the Ashton Report.

This recommendation can be read in conjunction with Recommendation AJP 3.

The Ashton Report states “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.”

Further context regarding this recommendation is included on page 98 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

Unable to be verified.

VERIFICATION PROCESS

This recommendation is considered an RSPCA SA policy position and does not provide any specific action which can be attributed to a particular party. It is not a recommendation that can be objectively measured. It is a general statement which requires a subjective judgement to be made, considering a variety of factors. This is equally applied to defining the recommendation’s qualifying words of “significant”, “entrenched” and “inherent.”

The RSPCA SA has raised numerous concerns around greyhound welfare. Many of these have been recognised by the Ashton Report and form the basis of recommendations. Several recommendations centred on animal welfare have been addressed and verified by the GIRI.

Animal welfare aspects specifically and generally have been taken into consideration by the GIRI throughout this report. A judgement on whether the industry should be supported is contained in the final decision of this report in respect to Recommendation 57.

RECOMMENDATION RSPCA 3 – COMPLETED

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.

CONTEXT

Recommendation RSPCA 3 is one of 10 recommendations submitted by the RSPCA and accepted by the Ashton Report.

Recommendation RSPCA 3 should be read alongside Recommendation 4, Recommendation 9 and Recommendation 10 for more information on GRSA's interests management processes.

Further context regarding this recommendation is included on pages 35, 38 and 39 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

3 July 2025

VERIFICATION PROCESS

GRSA submitted a copy of the GRSA Constitution and drew attention to Clause 37 which limits the number of Directors with a racing background and Clause 79.5 which prohibits a Licensed Person or someone affiliated with an Industry Body in the previous five years from being appointed to the Board as an Independent Director.

37 Qualification to be a director

37.1 There must be at least 4 Independent Directors, who must collectively hold the qualifications and experience as follows:

- a) at least one Independent Director must have qualifications and experience in financial management;*
- b) at least one Independent Director must have qualifications and experience in marketing;*
- c) at least one Independent Director must have qualifications and experience in carrying on a business;*
- d) at least one Independent Director must have qualifications and experience as a legal practitioner;*
- e) at least one Independent Director must have qualifications and experience in animal welfare;*
- f) at least one Independent Director must have qualifications and experience in integrity; and*
- g) at least one Independent Director must have such qualifications and/or experience determined by the Directors' Selection Panel to be necessary to address existing and/or emerging governance and integrity issues relevant to the Company.*

37.2 For the purposes of clause 37.1, a single Independent Director may satisfy more than one of the qualification and experience requirements set out in clauses 37.1(a) to (g).

37.3 There must be one director with experience in the greyhound racing industry, and who may be a Licensed Person.

37.4 A director must not hold any appointment as an officer of any Industry Body at any time during the term of their appointment as a director, unless it is directly relevant to the performance of their role as a director to do so.

The Constitution defines an Independent Director as:

79.5 Independent Director means a director of the Company who is not, and has not in the 5 years immediately prior to the relevant time been:

- a) a Licensed Person;*
- b) or in any capacity, an officer, representative or member of any Industry Body; provided that the person will not be taken to be an officer, representative or member of an Industry Body solely*

because they served on a committee, subcommittee, panel or working group of an Industry Body (including, without limitation, an integrity and welfare committee, a governance and risk committee, or an integrity hearings panel).

GRSA submitted a copy of the Board Charter which formalised Board composition (limiting greyhound backgrounds) and introduced a vetting process, referring to industry affiliations, transparency, due diligence and independence.

The updated GRSA Board Charter reads as follows:

Board Appointment Vetting Process

To uphold the independence and integrity of GRSA's governance, the Directors' Selection Panel will be responsible for:

- *Conducting due diligence on prospective board and regulatory body members.*
- *Assessing any existing or prior affiliations with the greyhound racing industry.*
- *Ensuring that appointments comply with GRSA's independence requirements as outlined in the Constitution.*
- *Maintaining transparency and accountability in the selection process.*

This process ensures that GRSA's governance remains independent, objective, and free from industry influence.

GRSA advised it had created a new Director Selection Panel (DSP) Terms of Reference (TOR). GRSA submitted an extract from its May 2025 Board Minutes showing Board approval of the DSP TOR.

The GRI observed the updated GRSA Constitution and Board Charter on the GRSA website.

The GRI reviewed the documentation provided and requested that GRSA provide a copy of the new DSP TOR so the GRI could confirm its existence and review the content for alignment with the recommendation.

GRSA subsequently submitted the new DSP TOR.

The GRI noted the contents of the TOR outlined the DSP Board Director vetting process, including the following aspects:

- Conflict of Interest Declarations for past or present involvement in the greyhound racing industry.
- Exclusion of any Independent Director nominee with affiliations in the past five years.
- The requirement that nominees do not benefit from affiliations with the greyhound racing industry (exempting the one non-Independent Director with greyhound racing experience, as specified in Clause 37 of the Constitution).

The GRI verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GRI requested GRSA provide information on the vetting processes of the appointments of any Board Directors since the initial recommendation verification date of 3 July 2025.

GRSA advised there had been one appointment (Director 1) and one re-appointment (Director 2) to the Board since the verification of this recommendation.

GRSA advised the process to appoint Director 1 was finalised under the prior Constitution.

GRSA advised the DSP appointment process, DSP documentation under the revised Constitution, and the DSP TOR were put in place in July 2025. The new process was followed for the re-appointment of Director 2.

GRSA provided documentation which confirmed the processes followed to appoint Director 1 and re-appoint Director 2.

COMMENTARY

The GRI noted that, while a vetting process has been established, the DSP TOR creates an exemption for the appointment of a non-Independent Director with greyhound industry experience.

The GRI also notes GRSA had processes in place regarding declarations of interests and conflicts. Recommendation 4, Recommendation 9 and Recommendation 10 provide further information on GRSA's governance processes.

RECOMMENDATION RSPCA 6 – COMPLETED

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

CONTEXT

Recommendation RSPCA 6 is one of 10 recommendations submitted by the RSPCA and accepted by the Ashton Report.

The *Animal Welfare Act 2025* (SA) defines the illegal practice of live baiting as “an activity in which -

- a) a live animal is introduced into an area for the purpose of being chased by 1 or more dogs or training a dog to chase real or simulated animals; or
- b) the carcass or any part of an animal is introduced into an area or moved around an area (or both) for the purpose of being chased by 1 or more dogs or training a dog to chase real or simulated animals...”

Section 159, Subsection 1 of the Greyhounds Australasia Rules also lists offences relevant to luring and live baiting.

RECOMMENDATION VERIFICATION DATE

9 June 2026

VERIFICATION PROCESS

GRSA advised the GIRI that it had created a new Investigative Steward position, introduced new investigation procedures, engaged a licenced drone operator and previously enforced strong penalties.

GRSA submitted an ‘Employment Agreement’ between GRSA and the new Investigative Steward.

GRSA submitted an ‘Employment Agreement’ between GRSA and the new Intelligence and Betting Analyst.

GRSA submitted the ‘Position Description’ for the new Intelligence and Betting Analyst.

GRSA submitted an ‘Investigation and Surveillance Procedure’ document which refers to the recent additions of body-worn cameras and aerial surveillance and recognises the Intelligence Analyst’s role in identifying high-risk participants on the “basis of potential live baiting activities”.

GRSA submitted a Stewards Notice reporting the result of investigation of ill-treatment breaches by two participants (June 2024), confirming the significant sanctions imposed.

GRSA submitted a ‘GRSA Intelligence Report (Participant Profile)’ prepared by the Intelligence and Betting Analyst. The report provided a risk assessment conducted into identified participants alleged of serious welfare concerns.

The GIRI reviewed the documentation provided and requested that GRSA provide further information regarding the engagement of a licenced drone operator. The GIRI also asked GRSA to provide further information on strong penalties for animal welfare breaches since June 2024.

GRSA subsequently submitted further detailed information regarding the engagement and usage of a drone operator. GRSA also advised that the drone operator had been provided with a Steward’s Authority to undertake activities where directed.

GRSA submitted a list of penalties handed down for animal welfare breaches from June 2024 to April 2026 in addition to a list of penalties arising from Stewards Inquiries from July 2024 to March 2026.

The GIRI reviewed the documentation provided and requested that GRSA provide a copy of the Steward’s Authority as referenced in the information provided to the GIRI. The GIRI also asked GRSA to confirm the spreadsheet represents penalties handed down by the IHP and to further confirm that there had been no other animal welfare penalties handed down since June 2024.

GRSA subsequently submitted a copy of the Steward's Authority granted to the drone operator and an 'Instrument of Appointment' under Greyhounds Australasia Rule 16 authorising the drone operator relevant powers regarding surveillance and investigation.

GRSA confirmed that the previous spreadsheet provided represented all breaches/penalties handed down by Integrity Hearings Panel (IHP)/Stewards Inquiries.

GRSA submitted a list of all animal welfare breaches that had incurred fines and were not submitted to the GIRI previously.

The GIRI confirmed that the information GRSA had provided in this submission and previous submissions supported the view that GRSA had increased its efforts regarding animal welfare investigations, surveillance and enforcement of penalties.

The GIRI verified this recommendation as complete.

COMMENTARY

The GIRI noted a longer period of time will be required to fully determine whether there is a consistency of penalties and the full identification of serious breaches such as live baiting.

The GIRI observed GRSA Integrity and Welfare staff using body worn cameras during kennel inspections.

GRSA advised it had conducted aerial surveillance in relation to an allegation of live baiting during the reform period.

RECOMMENDATION RSPCA 7 – COMPLETED

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.

CONTEXT

Recommendation RSPCA 7 is one of 10 recommendations submitted by the RSPCA and accepted by the Ashton Report.

Recommendation RSPCA 7 should be read in conjunction with Recommendation 49.

RECOMMENDATION VERIFICATION DATE

31 October 2024

VERIFICATION PROCESS

GRSA submitted an updated Integrity and Welfare Committee (IWC) Charter with two amendments aligning with the recommendation. The two updates are as below.

3.3 Additional Responsibilities

(b) Reviewing decisions of the IHP for the preceding period, to consider –

(ii) if the penalty, objectively serves as an adequate deterrent to the industry...

(h) Monitor and review effectiveness of Stewards' programs on regulation of prohibited substances and prohibited methods, as defined in the Greyhounds Australasia Rules

GRSA also submitted its October 2024 Board Minutes showing its Board's approval of the updated IWC Charter.

The GIRI reviewed the documents provided and requested that GRSA provide further evidence of the increased monitoring and application of penalties.

GRSA subsequently submitted the Agenda and Minutes from the July 2024 IWC meeting. GRSA also submitted an IWC paper providing an update on stewards and Integrity Hearings Panel (IHP) inquiries with an attachment showing details of each banned substance inquiry including name, forum, allegation, charge(s), status, timeframe, publication status, penalty review and notification. These documents showed IWC discussion and approval of the new regular reporting format for updating the IWC on banned substance inquiries.

The GIRI was satisfied the monitoring and application of penalties in banned substance inquiries had increased and verified the recommendation as complete.

REVISIT OF RECOMMENDATION

In June 2026 the GIRI requested a list of all participants charged with prohibited substance breaches and the penalties applied since the initial recommendation verification date. The GIRI also asked for copies of IWC Minutes since that date.

GRSA provided a list of all participants charged with prohibited substance breaches and the penalties applied since the initial recommendation verification date.

GRSA provided IWC Minutes from the January 2025, March 2025, May 2025, July 2025, September 2025, November 2025, January 2026 and April 2026 meetings. The GIRI noted that relevant Agenda items were included in most meeting Minutes but were not listed as a standing item in the January and the April 2026 meeting Minutes.

RECOMMENDATION RSPCA 9 – COMPLETED

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.

CONTEXT

Recommendation RSPCA 9 is one of 10 recommendations submitted by the RSPCA and accepted by the Ashton Report.

Recommendation RSPCA 9 should be read in conjunction with Recommendation 47. However, it should be noted that Recommendation 47 states that Surgical Artificial Insemination (SAI) should be placed under an “immediate ban” while Recommendation RSPCA 9 only prohibits the “routine use of surgical artificial insemination” and does not include a timeframe for implementation.

The Australian Veterinary Association (AVA) advises:

“Surgical AI has been used in dogs for many years as an intrauterine insemination technique. It involves general anaesthesia of the animal, laparotomy, exteriorisation of the uterus and transuterine wall introduction of (typically) frozen thawed semen into the uterine lumen. This is then followed by replacement of the uterus into the abdomen, and closure of the laparotomy site.”

The Ashton Report stated “The current GRSA animal welfare policy does not cover the current industry practice of artificial insemination (AI).”

“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.”

TCI refers to Transcervical Artificial Insemination – an alternative method of insemination in the greyhound which does not involve surgery.

The Ashton Report further stated “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.”

In September 2024, Greyhounds Australasia, as the National greyhound racing industry peak body, announced the use of Surgical Artificial Insemination (SAI) in registered greyhounds would cease from 1 January 2026.

Further context for this recommendation can be found on page 86 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

1 July 2025

VERIFICATION PROCESS

GRSA advised the GIRI it was moving to ban SAI in-line with the national GA ban of 1 January 2026. The GIRI drew attention to the word “immediately” in the wording of Recommendation 47 and advised this proposed action would not be supported. As a result, GRSA then opted to bring in an SA-based SAI ban before the national ban.

GRSA submitted an email detailing GA’s approach to banning SAI nationally, including copies of:

- A GA Report titled ‘Considerations for The Phase Out of Surgical AI and Transition to Transcervical AI’
- GA’s ‘SAI Phase Out Working Group Draft Terms of Reference’

GRSA provided the GIRI with a draft copy of a proposed Local Rule banning SAI. The GIRI reminded GRSA of the immediacy of Recommendation 47 and advised it was required to:

- Immediately ban its usage; and
- Subject participants to disciplinary measures if they directly or indirectly use this method of breeding.

GRSA submitted this recommendation (along with Recommendation 47) for completion. The following documents were included:

- An April 2025 Board Decision Paper including new Local Rule L41, addressing both Recommendation 47 and Recommendation RSPCA 9.
- Extract from the April 2025 Board Minutes endorsing implementation of a new Local Rule (L41) banning Surgical Artificial Insemination.
- Extract from the March 2025 edition of Kennel Capers advising the industry of the new ban.

The new Local Rule states:

41 Prohibition of Surgical Artificial Insemination

- (1) A person commits an offence if they do, attempt to do, or cause to be done, any of the following acts, including any such act to a greyhound:*
 - (a) perform, facilitate, or arrange for the performance of surgical artificial insemination (SAI) on a greyhound within South Australia;*
 - (b) transport, or cause a greyhound to be transported, outside of South Australia for the purpose of undergoing SAI;*
 - (c) own, have custody of, or control a greyhound that has undergone SAI in contravention of this rule.*
- (2) Where a greyhound is, or is reasonably suspected to have been, subjected to SAI in breach of subrule (1), the Controlling Body or Stewards may take any of the following actions:*
 - (a) refuse the naming of the greyhound;*
 - (b) prohibit the greyhound from being nominated for any Event;*
 - (c) order the greyhound be scratched from any Event;*
 - (d) disqualify the greyhound from any Event;*
 - (e) require the forfeiture of any bonuses, incentives, or prizemoney derived or realised from the greyhound;*
 - (f) prohibit a greyhound from being registered;*
 - (g) refuse or cancel the registration of a litter;*
 - (h) cancel the registration of the greyhound;*
 - (i) take any other action deemed necessary in the interests of greyhound welfare and integrity.*
- (3) Any person who breaches subrule (1) may be penalised in accordance with the Rules.*
- (4) For the purposes of this rule, a person shall be deemed responsible for a greyhound undergoing SAI if they:*
 - (a) own, lease, or otherwise have custody or control of the greyhound at the time of the procedure; or*
 - (b) arrange for, facilitate, or direct that the procedure be carried out, regardless of where it occurs.*
- (5) Any person registered with Greyhound Racing SA Limited, including owners, trainers, breeders, and veterinarians, is subject to this rule, and ignorance of its provisions shall not be considered a defence.*

(6) *For the purposes of this rule:*

(a) **“greyhound”** means a breeding female and includes progeny thereof;

(b) **“Surgical Artificial Insemination (SAI)”** means a procedure in which semen is implanted into a greyhound via a surgical incision, typically requiring general anaesthesia and an invasive abdominal procedure.

(7) *In assessing the registration of a greyhound in South Australia, Greyhound Racing SA Limited may require the person requesting the registration to provide a certificate from the treating veterinarian confirming that the service of the breeding female was not performed by SAI.*

(8) *This rule commences on 1 July 2025.*

The GIRI confirmed that the updated Local Rules had been published on the GRSA website and that communication had been provided to the industry through Kennel Capers.

The GIRI advised GRSA that all the necessary information had been provided but he could not verify the recommendation had been implemented until the ban was put in place on 1 July 2025.

The GIRI verified this recommendation as complete on 1 July 2025.

REVISIT OF RECOMMENDATION

In June 2026, the GIRI requested further advice regarding any participants who have been the subject of a disciplinary offence for using SAI since the introduction of the ban. GRSA advised that there had been no breaches of this rule.

RECOMMENDATION RSPCA 14 – COMPLETED

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

CONTEXT

Recommendation RSPCA 14 is one of 10 recommendations submitted by the RSPCA and accepted by the Ashton Report.

Recommendation RSPCA 14 should be read in conjunction with Recommendation GRSA 17 and Recommendation AJP 9. However, Recommendation RSPCA 14 specifically prescribes the implementation of a “birth to death traceability system.”

These recommendations essentially require GRSA to implement a traceability system, albeit each uses slightly different terminology:

- Recommendation GRSA 17 – “...the eTrac greyhound traceability system”.
- Recommendation RSPCA 14 – “...birth to death traceability system.”
- Recommendation AJP 9 – “...whole-of-life tracking to monitor the welfare of greyhounds in the industry”

The Ashton Report noted that GRSA “lack a system sufficient for tracking greyhounds.”

Further context for this recommendation can be found on page 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

29 June 2026

VERIFICATION PROCESS

GRSA advised it had been exploring the development of a greyhound traceability system since 2023. These discussions involved the acquisition of the NSW eTrac system but this did not come to fruition.

GRSA therefore progressed with the development of an alternative system, the Greyhound Traceability System (GTS), designed to deliver the same traceability, welfare and regulatory outcomes as eTrac.

GRSA submitted a Capability Statement for the GTS.

The GIRI advised GRSA that GTS should include the following capabilities raised in Recommendation GRSA 17, Recommendation RSPCA 14 and Recommendation AJP 9:

- Tracking from birth to death
- Tracking of circumstances, location, ownership, and fate of individual greyhounds throughout their lifecycles
- Tracking to monitor the welfare of each greyhound
- Tracking including beyond retirement
- Transferring of manual processes to automated processes
- An intuitive system
- Tracking of import/export of greyhounds
- Data recording breeding/supply
- Current ‘whereabouts’ of each greyhound.

GRSA subsequently advised that the GTS had been developed and was fully operational for GRSA staff as of 1 April 2026. The system supported real-time capture of greyhound lifecycle events across property inspections and race meetings, and provided improved visibility of greyhound location, status and movement. The GTS was integrated with OzChase and combined with historical datasets to create a centralised and controlled system to support whole-of-life traceability.

The GRI noted the progress update and advised GRSA he would require an in-person demonstration of the new system.

GRSA subsequently submitted an extract from its December 2025 Board Minutes showing Board approval for Evolving Solutions to build and manage the GTS.

GRSA submitted a January 2026 Decision Paper by Circular Board Resolution approving development of the GTS and the appointment of Evolving Solutions to build and manage the GTS.

GRSA submitted a GTS Proactive Disclosure Statment (*sic*) of a GRSA Board Director detailing their association with Evolving Solutions.

GRSA submitted Software Licence Contracts between GRSA and Evolving Solutions. The documentation includes a Software Maintenance Agreement, Maintenance Agreement Schedule and Facilities Management Agreement, and Addendum for GTS Capability, Acceptance and Availability.

The GRI reviewed the documents provided and requested more information on the procurement process.

GRSA subsequently submitted further information and clarification to the GRI regarding the procurement of GTS.

GRSA submitted a ‘Flowbuilders Onboarding Compatibility Brief’ outlining the compatibility of GRSA’s greyhound welfare and compliance processes to the GTS.

GRSA submitted a ‘GTS Implementation Report’ outlining the steps involved to implement the GTS to provide traceability from birth to death of all greyhounds that reside or had resided in SA.

In June 2026 the GRI received an in-person demonstration of the GTS at the GRSA office guided by GRSA staff. GRSA advised the public interface of GTS was not yet live. The GRI advised GRSA he would need to be advised when the GTS was made publicly accessible on the GRSA website.

The GRI also requested GRSA provide evidence of communication to industry of the establishment of the GTS.

In June 2026 GRSA advised the GRI the GTS public interface was now live.

GRSA subsequently submitted an all-staff email advising of the new GTS.

GRSA submitted a screenshot of a GRSA Facebook post addressed to “GRSA Trainers and Breeders” advising participants of the new GTS.

GRSA submitted a screenshot of the GRSA website showing the new tab ‘Greyhound Traceability’.

Once the GTS public interface was confirmed as live, the GRI undertook a reconciliation of randomly selected greyhounds to confirm full capability. The GRI found that several greyhounds did not appear when searched. The GRI advised GRSA of this discrepancy.

GRSA confirmed 100 greyhounds had not been correctly loaded into the system. GRSA advised the issue would be rectified within the next day.

The GRI was subsequently advised the issue had been rectified. The GRI conducted another random search and confirmed all greyhounds searched were now listed as required.

At this point the GRI verified Recommendation GRSA 17 and Recommendation AJP 9 as complete. However, the GRI requested GRSA provide further information as the wording of Recommendation RSPCA 14 specifically refers to a “birth to death traceability system that tracks (greyhounds)... throughout their life cycle.” This raised the question of how GRSA would trace dogs following their racing careers and exit from the racing industry.

GRSA subsequently advised the GRI that if a retired racing greyhound remained in the care of an industry participant, the greyhound would continue to remain under GRSA oversight and could be traced through the GTS.

GRSA advised it had very limited oversight of greyhounds which have exited the industry through transfer to a non-industry participant owner or adopter, as that person is not licenced or registered by GRSA and is not subject to the same reporting obligations as an industry participant.

GRSA advised it had written to the Department for Environment and Water (DEW) proposing that the Dog and Cat Management Regulations be amended to grant GRSA access to the Dogs and Cats Online (DACO) database to support post-adoption traceability and greater GRSA visibility of the ownership and location of greyhounds after transfer to third-party adopters.

GRSA submitted a response from DEW where DEW declined the proposal, advising that the current legislative framework supports information sharing on a case-by-case basis where there is a lawful purpose and appropriate legal authority, however direct or ongoing access by GRSA to personal information in DACO without a legal basis would be inconsistent with Information Privacy Principles.

The GIRI was satisfied that GRSA has taken all actions available to implement “birth-to-death” traceability of greyhounds through the current regulatory framework.

The GIRI verified this recommendation as complete.

RECOMMENDATION RSPCA 15 – COMPLETED

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

CONTEXT

Recommendation RSPCA 15 is one of 10 recommendations submitted by the RSPCA and accepted by the Ashton Report.

There is a typographical error in the wording of Recommendation RSPCA 15 and the recommendation should read “Verify all third-party adoptions (i.e., adoptions not through organisations like GAP) and follow up those that are **not** genuine.”

RECOMMENDATION VERIFICATION DATE

4 March 2026

VERIFICATION PROCESS

GRSA submitted a ‘Third Party Rehoming Spreadsheet’ showing reconciliation and follow-up of all third-party greyhound adoptions that took place from FY 2019 – 20 to FY 2024 – 25.

GRSA further advised two former owners of greyhounds rehomed to a third-party did not provide the identity and contact details of the new owners. GRSA submitted a ‘Letter of Reprimand’ issued to one of the owners for breaching rehoming obligations. GRSA also submitted a copy of the outcome of a Stewards Inquiry where the other owner was charged with failing to notify the controlling body of the intention to rehome retired greyhounds.

The GIRI conducted an analysis of the rehoming spreadsheet and requested that GRSA provide further information in relation to a number of third-party adoptions. The GIRI noted the spreadsheet contained missing dates of verification, unverified entries or instances where the new location of greyhounds had not been followed up.

The GIRI also requested that GRSA provide third-party rehoming verification information for the FY 2025 – 26 year.

GRSA subsequently submitted an updated spreadsheet with updated data.

The GIRI confirmed that all anomalies from the initial spreadsheet had been rectified.

The GIRI was satisfied that GRSA had made all efforts to verify all third-party adoptions and follow up those that were not genuine.

The GIRI verified this recommendation as complete.

RECOMMENDATION RSPCA 19 – COMPLETED

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

CONTEXT

Recommendation RSPCA 19 is one of 10 recommendations submitted by the RSPCA and accepted by the Ashton Report.

Recommendation RSPCA 19 should be read in conjunction with Recommendation 33.

Recommendation RSPCA 19 has alignment with the requirements of Recommendation 34 and Recommendation 36.

The Ashton Report notes “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 Ashton Report recommended “...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.”

Further context regarding this recommendation is included on pages 78 to 80 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

1 October 2025

VERIFICATION PROCESS

GRSA advised it had implemented the intent of Recommendation RSPCA 19 as an internal policy requirement, embedding mandatory reporting into its ‘Complaints Handling Policy’, ‘Investigation Protocol Policy’, Integrity and Welfare Committee (IWC) Charter and meeting framework with the RSPCA.

GRSA submitted its Complaint Handling Policy and Investigation Protocol Policy, which mandate the reporting of welfare-related complaints and investigations to the RSPCA.

GRSA advised that its Governance & Risk Committee (GRC) considered and approved the policies, which codify the procedure for mandatory reporting to the RSPCA.

GRSA submitted a September 2025 Board Paper which recognises that the State Government has taken action to include mandatory reporting within the new *Animal Welfare Act 2025* (the Act).

The Act includes a provision for mandatory reporting of suspected breaches by GRSA staff and volunteers to the enforcement agency (RSPCA SA). The relevant part of the Act is “Section 13 – Special Requirements for Greyhound Racing Entities.”

The Act will become operational once the corresponding Regulations have been passed. DEW advised work is currently being undertaken to update the Animal Welfare Regulations.

The GIRI confirmed the information received satisfied the intention of the recommendation and verified this recommendation as complete.

REVISIT OF THE RECOMMENDATION

In June 2026 the GIRI requested that GRSA provide a list of referrals made to the RSPCA regarding animal welfare issues, and participants leaving the industry from October 2025 to June 2026.

GRSA submitted a list of all referrals made to the RSPCA between October 2025 and June 2026 and the outcomes advised by the RSPCA. This list did not include information regarding participants who had left the industry.

The GIRI observed that 'Participants leaving industry' is a standing item discussed at regular meetings between GRSA and the RSPCA.

RECOMMENDATION RSPCA 22 – COMPLETED

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

CONTEXT

Recommendation RSPCA 22 is one of 10 recommendations submitted by RSPCA and accepted by the Ashton Report.

Recommendation RSPCA 22 should be read in conjunction with Recommendation 58.

The Ashton Report notes “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.”

Further context for this recommendation can be found on page 34 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

25 June 2025

VERIFICATION PROCESS

GRSA submitted a letter to the GIRI advising of the appointment of Mark Townend AM as a Board Director. Mr Townend’s background includes a 19-year period as CEO of RSPCA Queensland. GRSA also attached a copy of Mr Townend’s ‘Director and Advisory Board Profile’.

GRSA submitted a copy of a letter to the Minister for Recreation, Sport and Racing advising of the appointment of Mr Townend.

The GIRI was satisfied Mr Townend’s appointment fulfilled the requirements of the recommendation and verified the recommendation as complete.

RECOMMENDATION RSPCA 24 – COMPLETED

Requirement for industry participants to undertake training in animal welfare.

CONTEXT

Recommendation RSPCA 24 is one of 10 recommendations submitted by RSPCA and accepted by the Ashton Report.

Recommendation RSPCA 24 should be read alongside Recommendation 25.9, Recommendation GRSA 1 and Recommendation GRSA 15. It should also be noted that Recommendation 25.9 was endorsed as being completed on 22 June 2026 and the GRI observed that the education program was made a) mandatory, b) part of the licensing process for current and future trainers, and c) applied to all trainers, not just those with higher rates of injury.

RECOMMENDATION VERIFICATION DATE

24 June 2026

VERIFICATION PROCESS

GRSA advised the GRI that animal welfare training for industry participants had been developed via both in-person and online modules.

GRSA submitted a slide pack of training module ‘Part 1 – Animal Welfare’ prepared for licence holders. Slide 2 specifically refers to Recommendation RSPCA 24.

GRSA submitted the June 2026 edition of Kennel Capers informing the industry of their requirements under the new mandatory training.

GRSA submitted a photo of racing club digital signage advising the industry of the mandatory training.

GRSA submitted a ‘Participant Completion Summary’ showing a record of all licenced industry participants and whether they had undertaken the training.

GRSA also advised it intends to suspend the licence of any persons who have not completed training by 7 July 2026.

The GRI confirmed the documentation provided evidenced GRSA met the requirements of the recommendation. The GRI verified this recommendation as complete.

REVISIT OF THE RECOMMENDATION

In June 2026 GRSA provided an updated list of licenced industry participants and their status of training completion.

RECOMMENDATION AJP 3 (ACCEPTED WITH RESPECT TO GREYHOUND WELFARE) – UNABLE TO BE VERIFIED

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

CONTEXT

Recommendation AJP 3 is one of five recommendations submitted by the AJP and accepted by the Ashton Report.

This recommendation can be read in conjunction with Recommendation RSPCA 1.

The Ashton Report noted “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.”

The Ashton Report further observes that “Animal welfare is the primary issue affecting the ongoing viability of greyhound racing in South Australia.”

“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.”

Further context regarding this recommendation is included on pages 5, 6, 25 and 26 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

Unable to be verified.

VERIFICATION PROCESS

This recommendation is considered a position statement and does not provide any specific action which can be attributed to a particular party. It is not a recommendation that can be objectively measured. It is a general statement which requires a subjective judgement to be made, considering a variety of factors. The GIRI was not provided any specific evidence by any party to satisfy the completion of this recommendation.

Specific welfare concerns are addressed in multiple recommendations throughout the Ashton Report. The Ashton Report discusses greyhound welfare issues from pages 53 to 91.

Animal welfare aspects specifically and generally have been taken into consideration by the GIRI in the final decision of this report in respect to Recommendation 57.

RECOMMENDATION AJP 7 – COMPLETED

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

CONTEXT

Recommendation AJP 7 is one of five recommendations submitted by the AJP and accepted by the Ashton Report.

Recommendation AJP 7 is a recommendation for which the Government is responsible.

RECOMMENDATION VERIFICATION DATE

17 June 2025

VERIFICATION PROCESS

The Minister for Climate, Environment and Water advised that enforcement of the animal welfare legislation is a responsibility for the RSPCA and pursuing prosecutions is a decision for the RSPCA to make.

The GIRI wrote to the RSPCA SA requesting an update on progress made on recommendations responsible to RSPCA – Recommendation 34, Recommendation 35, Recommendation 36, Recommendation RSPCA 19 and Recommendation AJP 7.

RSPCA advised of the following:

“RSPCA SA reiterates our firm commitment to actively pursuing prosecution in every instance where evidence substantiates a breach of the Animal Welfare Act... Our prosecution policy is clear; where sufficient evidence is available, cases will be vigorously pursued to the full extent of the law.”

The GIRI was satisfied the intent of the recommendation had been met based on the information provided by the Government and the RSPCA.

The GIRI verified this recommendation as complete.

REVISIT OF RECOMMENDATION

In April 2026 the GIRI requested that the RSPCA provide an update on the recommendations for which the RSPCA held responsibility.

In June 2026 the RSPCA advised the following in regards to Recommendation AJP 7:

“Any alleged welfare breaches by participants in the Greyhound racing industry are investigated in the same way that all other alleged breaches of the state’s Animal Welfare Act are investigated. Realistically however, due to the way the industry operates it is unlikely that breaches of the state’s Animal Welfare Act will be detected and reported to the RSPCA.”

RECOMMENDATION AJP 8 – NOT COMPLETED

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

CONTEXT

Recommendation AJP 8 is one of five recommendations submitted by the AJP and accepted by the Ashton Report.

Recommendation AJP 8 should be read in conjunction with Recommendation 55.

The Ashton Report stated “...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.”

Further context for this recommendation can be found on pages 8, 93, 94 and 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

Not considered as complete.

VERIFICATION PROCESS

GRSA initially advised it estimated 600 SA-bred pups to be an appropriate static annual breeding cap as a maximum annual limit. GRSA further advised the cap would be introduced as of 1 July 2026 for a five-year period, following which the number would be reviewed.

GRSA provided advice of breeding numbers since FY21 to present.

GRSA submitted a May 2026 Circular Board Resolution Decision Paper regarding the introduction of a breeding cap of 600 SA-bred pups per year from 1 July 2026. The paper was approved by the GRSA Board. The GIRI noted the paper stated the cap would be implemented subject to GIRI endorsement.

GRSA submitted a paper titled ‘Historical Breeding, Racing Population and Retirement Data’ containing statistics regarding breeding activity, racing population, retirement and observations from 2019 to 2026.

The GIRI reviewed the advice and documentation and requested GRSA respond with further information to provide insight into how GRSA arrived at the 600-dog figure. GRSA was asked to provide further information on population modelling, adoption and rehoming, sustainability and method of enforcement.

GRSA subsequently advised the GIRI of how it determined the numbers for the interstate transfer and breeding caps (Recommendation 55 and Recommendation AJP8) which included racing population data (starters, race meetings, average starts, retirement and rehoming data, interstate greyhound data) used to determine the optimum number of unique starters per financial year. GRSA explained how that figure was the basis for establishing a maximum cap of 600 SA-bred dogs per year. GRSA explained that enforcement would be measured through OzChase, monitored internally, reported monthly to the GRSA Board and published externally to the industry.

GRSA advised that the breeding cap and interstate transfer cap would now be in place for an initial three years then reviewed.

GRSA advised that the breeding cap will have a longer-term impact (the next 18 months) while the cap on interstate transfers (Recommendation 55) will have an immediate impact.

GRSA submitted historical analysis of breeding data, utilisation rates and interstate transfers from 2019 to 2025.

GRSA submitted a paper used to determine future modelling of both annual breeding and interstate transfer caps.

GRSA submitted an extract from its June 2026 Board Minutes showing discussion of the progress of this recommendation.

The GRI requested GRSA provide further information regarding:

- How the cap would be introduced.
- When the cap will be introduced or commence.
- How the cap will be communicated to the industry.

GRSA subsequently provided responses including that the cap would commence on 1 July 2026 and would be communicated to the industry shortly thereafter.

GRSA noted industry communication would not be circulated until GRSA received the GRI's verification of the breeding cap.

The GRI advised that his endorsement was not required prior to the introduction of the breeding cap.

On 7 July 2026 GRSA advised the GRI that the annual breeding cap had been introduced and communicated to the industry.

ASSESSMENT

Recommendation AJP 8 requires GRSA to take two distinct actions:

- Introduce a breeding cap, and
- Enforce the breeding cap.

The GRI is satisfied by the information provided that a breeding cap was developed and introduced.

However, as the breeding cap was introduced on 1 July 2026 and communicated to the industry on 7 July 2026 (the final day of the reform period), there could be no evidence of enforcement of the breeding cap.

RECOMMENDATION AJP 9 – COMPLETED

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

CONTEXT

Recommendation AJP 9 is one of five recommendations submitted by the AJP and accepted by the Ashton Report.

Recommendation AJP 9 should be read in conjunction with Recommendation GRSA 17 and Recommendation RSPCA 14 as all relate to the implementation of a greyhound traceability system.

These recommendations essentially require GRSA to implement a traceability system, albeit each uses slightly different terminology:

- Recommendation GRSA 17 – “...the eTrac greyhound traceability system.”
- Recommendation RSPCA 14 – “...birth to death traceability system.”
- Recommendation AJP 9 – “...whole-of-life tracking to monitor the welfare of greyhounds in the industry.”

The Ashton Report noted that GRSA “lack a system sufficient for tracking greyhounds.”

Further context for this recommendation can be found on page 95 of the Ashton Report.

RECOMMENDATION VERIFICATION DATE

26 June 2026

VERIFICATION PROCESS

GRSA advised it had been exploring the development of a greyhound traceability system since 2023. These discussions involved the acquisition of the NSW eTrac system but this did not come to fruition.

GRSA therefore progressed with the development of an alternative system, the Greyhound Traceability System (GTS), designed to deliver the same traceability, welfare and regulatory outcomes as eTrac.

GRSA submitted a Capability Statement for the GTS.

In January 2026, the GIRI advised GRSA that, if GTS replicates the functionality of eTrac, its development and implementation would satisfy Recommendations GRSA 17, RSPCA 14 and AJP 9.

The GIRI advised GRSA that GTS should include the following capabilities raised in Recommendation GRSA 17, Recommendation RSPCA 14 and Recommendation AJP 9:

- Tracking from birth to death
- Tracking of circumstances, location, ownership, and fate of individual greyhounds throughout their lifecycles
- Tracking to monitor the welfare of each greyhound
- Tracking including beyond retirement
- Transferring of manual processes to automated processes
- An intuitive system
- Tracking of import/export of greyhounds
- Data recording breeding/supply
- Current ‘whereabouts’ of each greyhound.

GRSA subsequently advised that the GTS had been developed and was fully operational for GRSA staff as of 1 April 2026. The system supported real-time capture of greyhound lifecycle events across property inspections and race meetings, and provided improved visibility of greyhound location, status and movement. The GTS was integrated with OzChase and combined with historical datasets to create a centralised and controlled system to support whole-of-life traceability.

The GIRI noted the progress update and advised GRSA he would require an in-person demonstration of the new system.

GRSA subsequently submitted an extract from its December 2025 Board Minutes showing Board approval for Evolving Solutions to build and manage the GTS.

GRSA submitted a January 2026 Decision Paper by Circular Board Resolution approving development of the GTS and the appointment of Evolving Solutions to build and manage the GTS.

GRSA submitted a GTS Proactive Disclosure Statment (*sic*) of a GRSA Board Director detailing their association with Evolving Solutions.

GRSA submitted Software Licence Contracts between GRSA and Evolving Solutions. The documentation includes a Software Maintenance Agreement, Maintenance Agreement Schedule and Facilities Management Agreement and Addendum for GTS Capability, Acceptance and Availability.

The GIRI reviewed the documents provided and requested more information on the procurement process.

GRSA subsequently submitted further information and clarification to the GIRI regarding the procurement of GTS.

GRSA submitted a 'Flowbuilders Onboarding Compatibility Brief' outlining the compatibility of GRSA's greyhound welfare and compliance processes to the GTS.

GRSA submitted a GTS Implementation Report outlining the steps involved to implement the GTS to provide traceability from birth to death of all greyhounds that reside or had resided in SA

In June 2026 the GIRI received an in-person demonstration of the GTS at the GRSA office guided by GRSA staff. GRSA advised the public interface of GTS was not yet live. The GIRI advised GRSA he would need to be advised when the GTS was made publicly accessible on the GRSA website.

The GIRI also requested GRSA provide evidence of communication to industry of the establishment of the GTS.

In June 2026 GRSA advised the GIRI the GTS public interface was now live.

GRSA subsequently submitted an all-staff email advising of the new GTS.

GRSA submitted a screenshot of a GRSA Facebook post addressed to "GRSA Trainers and Breeders" advising participants of the new GTS.

GRSA submitted a screenshot of the GRSA website showing the new tab 'Greyhound Traceability'.

Once the GTS public interface was confirmed as live, the GIRI undertook a reconciliation of randomly selected greyhounds to confirm full capability. The GIRI found that several greyhounds did not appear when searched. The GIRI advised GRSA of this discrepancy.

GRSA confirmed 100 greyhounds had not been correctly loaded into the system. GRSA advised the issue would be rectified within the next day.

The GIRI was subsequently advised the issue had been rectified. The GIRI conducted another random search and confirmed all greyhounds searched were now listed as required.

The GIRI verified this recommendation as complete.

RECOMMENDATION AJP 13 – COMPLETED

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

CONTEXT

Recommendation AJP 13 is one of five recommendations submitted by the AJP and accepted by the Ashton Report.

Recommendation AJP 13 is a recommendation for which the Government is responsible.

The legislation relevant to this recommendation is the *Freedom of Information Act 1991* (SA) (the FOI Act).

Freedom of information is an administrative process that enables members of the public to apply to access information held by Government Agencies, Local Councils, Universities and Minister's Offices.

Agencies subject to the FOI Act are defined in Section 4 of the Act. Private organisations are not subject to the FOI Act. Accordingly, as a Company Limited by Guarantee, GRSA is not subject to the FOI Act.

RECOMMENDATION VERIFICATION DATE

7 July 2026

VERIFICATION PROCESS

The Attorney-General advised that the Crown Solicitor's Office was engaged to determine whether the racing controlling authorities named under the *Authorised Betting Operations Act 2000* (SA) might already fall within the definition of "agency" in the FOI Act and, if not, the legal scope to prescribe these bodies as agencies under the FOI Act under paragraph (g) of the FOI Act definition of "agency".

The Attorney-General provided detailed consideration of this recommendation and the *Freedom of Information (Greyhound Racing Transparency) Amendment Bill 2025*. The Attorney-General determined that any amendment to the FOI Act was not necessary, in part, as there were better/existing alternatives for achieving transparency within the greyhound racing industry.

The Attorney-General also advised any amendments to include racing bodies could potentially cause inconsistencies in the treatment of private entities.

It can be assumed that the intention of this recommendation is to make GRSA (along with other racing bodies) subject to the requirements of the FOI Act. However, it is noted that GRSA does not fall within the FOI Act definition of "agency," and consequently it cannot be made exempt, as it is not captured by Act. Therefore, this recommendation is unable to be actioned.

The GIRI verified the Government had provided its consideration of this recommendation following which it decided not to take any further action. The GIRI is satisfied no current exemptions exist within the FOI Act which apply to the racing industry.

This recommendation is verified as complete.

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