

New Zealand Greyhound Racing Association

Independent Welfare Review

25 June 2013

Confidential

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1. Executive Summary



The key findings of the NZGRA independent review into the welfare of greyhounds and areas where the review team has made recommendations for improvement are detailed below:

Care and Welfare of Racing Greyhounds

The review team investigations found little evidence of issues relating to the care of greyhounds during their racing careers. Interviews with participants in the Greyhound Racing industry highlighted that many owners and trainers are committed to the welfare and safety of their dogs and care passionately about them throughout their lives. It is notable that, as far as we are aware, there has never been a conviction of a licenced person under the Animal Welfare Act.

Whilst the review team found little evidence of issues relating to the care of greyhounds during their racing careers, there are no formal minimum standards of welfare in place that have been approved by any external welfare bodies and there is both a lack of enforcement and awareness of welfare standards with 40% of trainers interviewed unaware of the NZGRA's Animal Welfare Policy.

Population Management

There are key issues facing the greyhound racing industry on population management that result in many non-competitive greyhounds facing a shorter than normal life expectancy with our analysis showing that more than 200 greyhounds each year do not make it to the race track. The greyhound racing industry's culture, systems and processes for tracking the lifecycle of the registered greyhound are inadequate with focus placed only on the racing career of the greyhound. Our analyses suggest that approximately 35% of greyhounds whelped never make it to the track. Due to a lack of effective reporting the review team was unable to establish what happens to these greyhounds.

There is also a lack of effective reporting and tracking of greyhounds at the end of their racing careers. As a result the review team had significant difficulty in identifying the outcome for greyhounds when they finish racing. 30% of the 2,305 greyhounds leaving racing between 2009 and 2012 are recorded as deceased by NZGRA with the potential for this number to be significantly higher due to the lack of effective tracking of retired greyhounds.

The issue of euthanasia of healthy greyhounds is a key welfare concern. Changes in community expectations on animal welfare have been highlighted by the Animal Welfare Strategy issued by the Ministry for Primary Industries in May 2013. The lack of transparency over the outcome for greyhounds leaving the racing industry along with the reported levels of euthanasia have led the review team to consider that the current situation is not sustainable for the industry given the indications of changing community expectations as outlined by the Government's Animal Welfare Strategy.

Track Safety Standards and Injuries

A further issue facing the greyhound racing industry is the incidence of injuries occurring during racing. Although there is veterinary attendance and at every race meeting, the practice of recording and monitoring injuries in NZ has been inadequate. However, with the coordination of the Racing Integrity Unit (RIU) a system has commenced to identify not only the nature of injuries but the specific likely cause such as racing collision or track surface. Further developments in the reporting and analysis of injuries are however

required.

There has been very little development of globally recognised optimum track standards for greyhound racing and as a consequence there is no reference point on areas such as optimum track surface, the optimum bend camber, distance of starting boxes to turns, and the ideal number of turns on a track. Consequently management of track issues will continue to be point of conflict until there are best practices researched and documented. The introduction of standards for moisture content and compaction readings for each track in New Zealand is a first step to establish measurable benchmarks.

Governance and Management of Welfare

A number of welfare actions have been initiated by NZGRA. However, the NZGRA Board has not prioritised actions or commitment to the goal of its strategic plan to have “world class” welfare resulting in many overseas jurisdictional successes in improved welfare and population management not being examined nor implemented. The creation of a welfare committee and the instigation of this review reflect an increased awareness and commitment by the NZGRA Board to address the gaps.

In the process of the review a culture of non-enforcement and non-compliance of welfare rules was evident. The industry must accept that the sport of greyhound racing is legitimised only by an Act of Parliament and the governing body must, as the custodian of the sport, introduce changes that ensure greyhound racing has that community approval.

It is a challenge for NZGRA as the governing body to lead a cultural change within the industry and to ensure welfare considerations outweigh any competitive or commercial consequences.

Recommendations for Improvement

Specific recommendations made by the review panel relate to:

- Education programs in breeding to manage the number of greyhounds whelped;
- Alternative racing programs to accommodate a greater range of dogs;
- Transparency and awareness of the tracking of the life-cycle of the greyhounds with improved database management and monitoring;
- Development of improved injury reporting;
- Development of formalised and contemporary welfare standards;
- Better enforcement of the current rules with regards to the retirement of the greyhound;
- A review of the service agreement with RIU;
- A review of the retirement options for greyhounds when not racing; and
- A different funding commitment by participants and industry to achieve better retirement outcomes.

2. Background



2.1 GREYHOUND RACING STRUCTURE IN NEW ZEALAND

2.1.1 HISTORY OF GREYHOUND RACING IN NEW ZEALAND

Greyhound racing in New Zealand was first established over 100 years ago. The National Coursing Association, the forerunner to the current New Zealand Greyhound Racing Association, was formed in 1908 as a way of uniting and strengthening greyhound racing clubs who were struggling to gain public interest in the sport. Coursing was banned in New Zealand in 1954 and the organisation then became the New Zealand Greyhound Racing Association.

Greyhound racing was awarded equalisator betting in August 1971 and in 1981 full off-site totalisator betting was introduced to greyhound racing. Public interest increased again in 1992 with the introduction of Trackside television.

In 1991, the majority of meetings held were non tote meetings and only 7 tote meetings were run each month. In 2001, 288 race meetings were run. Today, over 400 race meetings are completed each year and the vast majority of these races are being exported into the Australian market.

In 2012 Greyhound racing provided 42.4% of races run in New Zealand, outnumbering the equine codes of thoroughbred and harness racing (29.1% and 28.5% respectively). There are currently 10 Greyhound Racing Clubs in New Zealand with races regularly run on 7 greyhound racing tracks.

In 2012 NZGRA generated betting revenue of \$217,905,728. NZGRA's total revenue consisting of distributions and proceeds from betting revenue, subscriptions and other income totalled \$19.7m.

2.1.2 GOVERNANCE OF GREYHOUND RACING

Role of the New Zealand Racing Board

The racing industry is governed by the New Zealand Racing Board (NZRB) in accordance with the Racing Act 2003 and the NZRB provides the liaison between the three racing codes and the Minister for Racing. The NZRB is required to provide governance and oversight to the industry and the NZGRA through approval of the annual NZGRA statement of intent and business plan.

A New Zealand Racing Industry Chart is presented below:

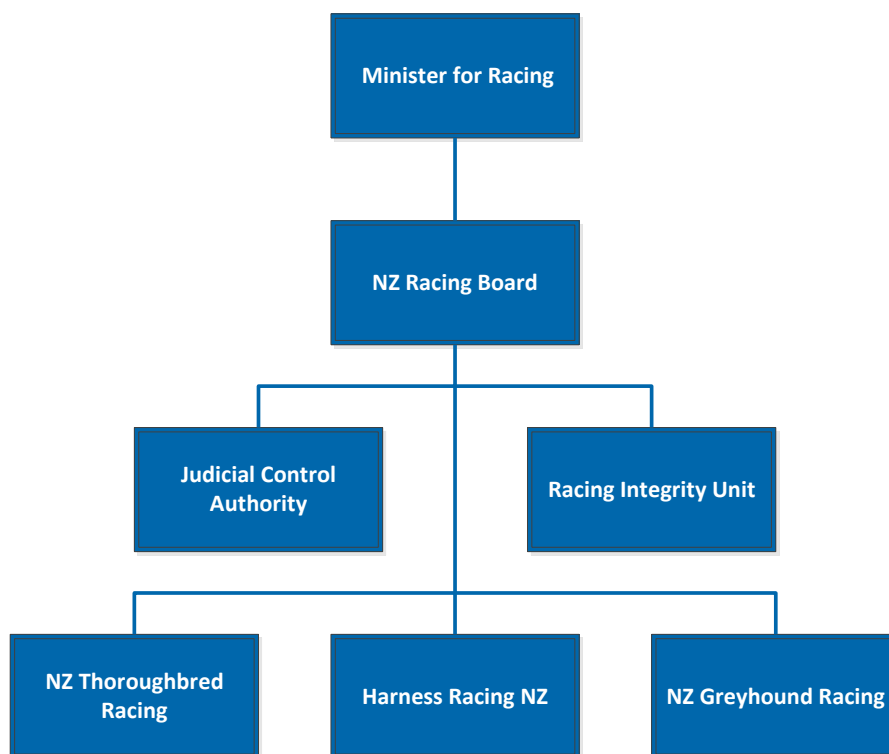


Table 1

Role of the NZGRA Board

NZGRA is an incorporated society consisting of the 10 registered member greyhound racing clubs in New Zealand. The Association was established to promote and advance greyhound racing, registration, breeding, safety and welfare in New Zealand and to formulate and administer rules and regulations governing these aspects. GRNZ is also responsible for the effective conduct of greyhound race meetings.

The NZGRA Board is responsible for setting the strategic direction of NZGRA in accordance with its ultimate responsibility, that being to promote and advance greyhound racing, registration, breeding, safety and welfare in New Zealand.

With regard to welfare, an Animal Welfare Committee was set up in 2012 with responsibility to ensure that “all greyhounds in New Zealand are protected and promoted by the adoption and development of sound animal welfare standards and practices.” The committee reviews matters relating to animal welfare across all aspects of the industry and meets on a quarterly basis. It has held two meetings since its inception in 2012.

Racing Integrity Unit

The New Zealand Racing Integrity Unit Ltd (RIU) created in February 2011 is an independent organisation responsible for integrity matters in the NZ racing industry.

With the establishment of the RIU, a clear delineation has been established between the agencies responsible for rule making (the three codes – harness, thoroughbred and greyhound racing), policing (the RIU), and the judiciary for integrity issues (the Judicial Control Authority).

Each of the three codes and the New Zealand Racing Board has a 25% shareholding in the RIU which has a

separate constitution and Board. The RIU is funded entirely by the New Zealand racing industry.

An Integrity Services Agreement exists between the racing codes and the RIU.

2.1.3 RULES AND LEGISLATION

Policies and Rules

NZGRA is governed by the Racing Act 2003 and the Rules of Racing. The Rules of Racing are determined by the Clubs and are subject to annual amendment at the Annual General Meeting. These Rules cover the constitutional rules of the NZGRA and its clubs, regulations for the conduct of greyhound race meetings and breeding regulations.

With regard to welfare, NZGRA has published an Animal Welfare Policy. The policy was initially issued in 2008. The current version was issued in 2012. Its purpose is to formalise and express the greyhound racing industry's commitment to its animal welfare obligations with a view to achieving consistency and improvement in current practices.

Welfare-Related Legislation

The key pieces of legislation with regard to the welfare of greyhounds that have been considered in this review are the Dog Control Act 1996, the Animal Welfare Act 1999 and the Animal Welfare (Dogs) Code of Welfare 2010.

- The Dog Control Act 1996 contains obligations for all dog owners regarding the care and control of their dogs.¹
- The Animal Welfare Act 1999 establishes the obligations on those responsible for the care of animals and the standard of conduct expected towards animals generally. The Act specifies that owners and persons in charge of animals (including dogs) must meet the needs of animals in their care.²
- The Animal Welfare (Dogs) Code of Welfare 2010 sets minimum standards for the care and management of dogs. The code applies to all persons responsible for the welfare of dogs and applies to all dogs, including racing greyhounds.³

2.2 OBJECTIVES AND TERMS OF REFERENCE OF THE REVIEW

The Steering Committee for the review was engaged by NZGRA to perform an independent review into the welfare of racing greyhounds. The terms of reference for the review were as follows:

- Evaluate the current standards, and enforcement, that govern the welfare of racing Greyhounds. The review will encompass the lifecycle of racing Greyhounds, including race track safety, health and veterinary considerations, and retirement.
- Evaluate the breeding industry regulations.

¹ Dog Control Act 1996 Section 5(1)

² Animal Welfare Act 1999 Part 1 Section 9(2)

³ Animal Welfare (Dogs) Code of Welfare 2010 Section 1

- Review NZGRA's mechanism for tracking racing Greyhounds and make recommendations for the improvement of their national database.
- Review the industry's awareness of Greyhound welfare and propose options for educating industry participants on minimum welfare standards.
- Make recommendations as to what changes are needed in respect of NZGRA's Strategic Plan, Animal Welfare Policy, the industry Code of Practice and the Rules of Racing.

NZGRA has stated that the review is intended to provide the basis for a renewed impetus from the industry to ensure that the welfare of racing Greyhounds is being appropriately managed. This includes looking at the whole lifecycle of racing Greyhounds and will cover a number of crucial aspects of the industry including breeding, injuries and treatment, life after racing, NZGRA tracking of dogs and the responsibilities of owners, trainers and clubs.

2.3 REVIEW TEAM

The review team was led by a dedicated steering committee to undertake the review by independent process. The structure and personnel for the review team was:

Steering committee:

- Bill Colgan – Chairman
Bill is a Racing Consultant with detailed knowledge of the Racing Industry. He is a former Interim Chief Executive of the New Zealand Racing Board.
- Craig Neil – Panel Member
Craig is an independent consultant and previously worked for the Office of the Auditor-General as an Assistant Auditor-General.
- Les Foy – Panel Member
Les is the Managing Principal of the WHK New Zealand Audit and Assurance practice.

WHK was engaged to perform the research, analytical and investigative work of this review and worked with the steering committee to develop a report on the findings and recommendations of the review. This work was undertaken by senior WHK staff.

2.4 INFORMATION GATHERING PROCESS

Whilst the review team could not take responsibility for exhaustively contacting every organisation and individual that may have an interest in greyhound racing, we took upon the task of interviewing and obtaining information from a wide-range of industry participants, stakeholders and other parties with an interest in greyhound and dog welfare.

Additionally, invitations to submit information and comments to the review team were published in the NZGRA's magazines and on its website.

Information for the review process was gathered by the following means:

- The project team interviewed and received responses from 47 owners, trainers and breeders ranging from small hobby trainers with only one or two dogs to major professional trainers with over 100 dogs

held on their properties.

- The owners, trainers and breeders interviewed covered a geographical cross-section of New Zealand with interviews undertaken at race meetings in Auckland, Cambridge, Wanganui, Christchurch, Dunedin and Invercargill and on trainers' properties.
- Overall, the interviews covered the owners or trainers of 58% of current racing greyhounds and 52% of all greyhounds held on licensed persons' properties.
- A standard interview questionnaire was used to obtain consistent, comparable information. The interview questionnaires were designed to obtain first hand information from interviewees own experiences, opinions and actions and not to obtain conjecture or hearsay on what others involved in the industry may or may not do.

Respondents and interviewees were assured of personal confidentiality but, nevertheless, the nature of interview based evidence lends itself to potential bias. The review team was nevertheless encouraged by the frankness of responses and has attempted, as far as possible, to avoid any bias in this report and, where possible, to rely on actual evidence rather than conjecture.

In addition to these owners, trainers and breeders, individual interviews were held with and information was received from numerous industry participants, stakeholders and other interested parties. These are listed in Appendix 2.

- In order to establish best practices in welfare, a significant number of formal policies, procedures and acts of legislation relevant to greyhound welfare were considered during the review. These documents are listed in Appendix 3.
- Independent welfare reviews into Greyhound racing were undertaken in the United Kingdom by the Associate Parliamentary Group for Animal Welfare in May 2007 and by Lord Donoughue of Ashton for the British Greyhound Racing Board and the National Greyhound Racing Club in November 2007. These reports are publicly available and where relevant we have made use of and reference to the recommendations of these reports.

2.5 LIMITATIONS OF THE REVIEW

The Rules of Greyhound Racing require all animals to be presented drug free for racing. The RIU is responsible for the enforcement of a drug free regime for racing animals and the judicial process followed for any positive tests is independent of the NZGRA Board.

The testing process involves:

- The swabbing samples (urine) are collected on race day by qualified Veterinarians following nationally agreed protocols.
- Under the protocols at the end of the day, the samples (which are in bottles with tamper evident lids, inside security bags with tamper evident seals) are couriered in secure courier bags to the Racing Laboratory for testing.
- Each sample has a unique number and the Laboratory has no knowledge of the Greyhound it is testing.

New Zealand Racing Laboratory Services Ltd. (NZRLS) holds the contract for the testing of all race meeting drug samples for the three racing codes in New Zealand. In 2012 more than 3,000 greyhound samples were

tested by the laboratory.

NZRLS is subject to and passes annual proficiency tests and successfully participates in negative sample reanalysis with peer laboratories overseas. It also holds an IANZ accreditation (ISO: 17025).

On the basis of the independence from NZGRA of this process and the separate accreditation of NZRLS, we have undertaken no further review of the drug testing regime.

2.6 BASIS AND USE OF REPORT

This report has been prepared in accordance with the objectives set out in the Terms of Reference and is subject to the limitations set out in Appendix 1 "Basis and Use of Report".

3. Population Management

3.1 INTRODUCTION

This section will review and establish:

- The number of dogs bred and number not making it to the track racing and what happens to these dogs;
- The number of racing dogs, both NZ bred and imported;
- How many dogs retire each year and what happens to these dogs.

3.2 SUMMARY OF MAIN FINDINGS

- A review of greyhounds whelped between 2009 and 2011 indicated that 34.5% of those greyhounds did not make it to the track.
- There is no tracking of greyhounds before they are registered as racing greyhounds and no information on what happens to greyhounds that are not registered to race.
- There is a lack of effective reporting and tracking of greyhounds at the end of their racing careers. As a result the review team had significant difficulty in identifying the outcome of those greyhounds.
- 30% of the 2,305 greyhounds leaving racing between 2009 and 2012 are recorded as deceased with the potential for this to be significantly higher.

3.3 DETAILED RESULTS AND FINDINGS

NZGRA's current greyhound database was implemented prior to the start of the 2009/10 greyhound racing season. It was noted by NZGRA that data prior to 2009 is not reliable and that migration issues into the new database compromised the integrity of the data transferred to the new database.

As a result of this and the fact that the approach of the review team was to review current practices in the industry, the decision was taken to use 01/08/2009 as the starting point for the analysis of greyhound numbers. Greyhound racing seasons run from 1st August to 31st July. NZGRA's internal reporting is based on these seasons and subsequently, we have also performed our statistical analyses based on these seasons.

3.3.1 GREYHOUND BREEDING NUMBERS IN NEW ZEALAND

Analysis of numbers bred in between 01/08/2009 and 13/02/2013 obtained from the NZGRA database of whelping records indicated that 492 litters of 3,081 greyhound puppies were whelped by a total of 220 different breeders or breeding syndicates.

The numbers of greyhounds bred each year are as follows:⁴

	2009/10	2010/11	2011/12	2012/13	Total
No. of litters whelped	126	139	138	89	492
No. of greyhounds whelped	741	925	853	562	3,081

Table 2

Greyhounds are required to be earbranded and microchipped before they have reached an age of 3 months.

Analysis of greyhounds that are registered to race indicated that the youngest greyhounds to be registered in the current 2012/13 season to date were whelped on 30/10/2011.

In order to establish numbers of greyhounds that are whelped but do not make it to the race track, those whelped during the 2009/10 and 2010/11 seasons have been analysed as the majority of those whelped after these dates will still be too young to be registered to race.

Greyhounds are registered to race by NZGRA when they are deemed ready to begin undertaking trials for racing. A number of greyhounds registered at this stage also do not go on to race competitively.

An analysis of the registration status at 7th March 2013 of greyhounds whelped during the 2009/10 and 2010/11 seasons is provided below:⁵

Greyhounds	2009/10	2010/11	Total
Whelped in the noted season	741	925	1,666
Of which earbranded	737	923	1,660
Of which registered to race	527	670	1,197
Of which earbranded not registered to race	210	*253	463
% Whelped not registered to race	28.3	27.4	27.8
Of which registered to race but not raced	46	*81	127
% Whelped not raced	6.2	8.8	7.6
Total whelped not raced	256	334	590
% Total whelped not raced	34.5	36.1	35.4

Table 3

*It should be noted that between February and March 2013 the number whelped in the 2010/11 season that were earbranded but not registered to race reduced from 266 to 253 and the number registered but not raced reduced from 126 to 81. It is possible that this number will reduce further as more of these greyhounds start to race.

The average over the two years does however suggest that 35% of greyhounds whelped do not make it to the race track.

We have corresponded with other jurisdictions regarding these percentages and whilst these percentages do not differ significantly from theirs, this issue is also recognised by other jurisdictions to be an area of significant concern.

⁴ Source: NZGRA Database

⁵ Source: NZGRA Database

It is to be noted that a percentage of greyhounds will never be suited to racing due to lack of interest or ability.

3.3.2 TRACKING OF GREYHOUNDS THAT DO NOT MAKE THE RACE TRACK

The intention of the review team was to establish what happens to greyhounds that do not make it to the track. However, there is no formal tracking of greyhounds before they are registered as racing greyhounds with NZGRA. Registration occurs when the greyhound is on average 18 months old but occurs in general between the ages of 14 and 24 months. As a consequence there is currently no reliable method of tracking the outcome for individual greyhounds that do not make it to the race track and have not been registered to race.

The options for such greyhounds, confirmed in interviews with owners and trainers, are the following:

- Rehomed through Greyhounds As Pets (GAP);
- Rehomed through rehoming charities other than GAP;
- Rehomed privately;
- Returned to owners;
- Kept as a pets;
- Exported;
- Death though injury/natural causes;
- Euthanized.

Figures from GAP identified that between 01/09/2009 and 10/04/2013 a total of 82 greyhounds that had not been registered to race and 36 that were registered to race but had never raced (15 of which were whelped in the 2009/10 and 2010/11 seasons) were placed with them by trainers.

Due to differences in database recording it is not possible to match these greyhounds individually against the NZGRA database to identify when each of these greyhounds was whelped. However, an estimate can be made from the 3¾ seasons under review that on average of 31 unraced greyhounds are placed through GAP each year.

The outcome for the remainder that have not been registered to race is unknown.

Greyhounds that have been registered to race are recorded in the NZGRA database. The outcome of those greyhounds that were registered to race but have not raced per the NZGRA and GAP databases is as follows:

Season whelped	2009/10	2010/11	Total
Greyhounds named not raced	46	81	127
Fate as per databases			
Registered to race in January 2013	0	18	18
Still registered	25	47	72
Deregistered:	21	16	37
- Deceased	9	4	13
- GAP	4	11	15
- Massey	1	0	1
- Deregistered/Retired no further comment	7	1	8
Total	21	16	37

Table 4

Due to lack of effective tracking of greyhounds that have been registered but not raced, the review team has also been unable to verify what has happened to these greyhounds.

3.3.3 POPULATION OF RACING GREYHOUNDS

The population of racing greyhounds and turnover of them from season to season can be seen in Table 5 below which shows the numbers of greyhounds that have started a race in each of the previous three completed seasons, those which raced in the season marked but did not race in the following year as well as the numbers of new greyhounds starting racing in the respective season.

For 2009/10 it should be noted that the new racing greyhounds only includes those registered to race in the 2009/10 season. There may have been new racing greyhounds in that season that were registered in earlier seasons.

	2009/10	2010/11	2011/12	Total
Started race in season	1,917	1,869	1,850	5,636
Did not race in following year	845	784	676	2,305
New racing greyhounds	651	797	765	2,213
- of which NZ bred	374	484	542	1,400
- of which Australian bred	277	313	223	813

Table 5

3.3.4 OUTCOME FOR RETIRING GREYHOUNDS

The numbers of greyhounds retiring from racing each season from racing are:

	2009/10	2010/11	2011/12	Total
Greyhounds retired during season	845	784	676	2,305

Table 6

In order to establish the outcome for the greyhounds that had finished racing in each of the years shown in Table 6 above, a review of the NZGRA database was performed. A deregistration form is required to be completed for all deregistered greyhounds in line with Rule 133.2 of the Rules of Racing and as such, it should have been, theoretically, an exercise without difficulty. However, due to a lack of compliance with the rules by industry participants and a lack of enforcement of the rules by NZGRA the review team was required to perform its own analysis but had significant difficulty in identifying the outcome for greyhounds leaving the racing industry.

The numbers presented in Table 8 below were determined by performing the following tasks:

- Data lists from the NZGRA database were extracted and analysed, using data analysis software and in some cases manually, to establish the outcomes reported. It is noted that, in a significant number of cases, the greyhound has been deregistered with no further comment or is simply listed as retired.
- A review the GAP database for greyhounds entered into GAP was performed. The NZGRA database figures had indicated that of greyhounds retiring during the 3 years reviewed, 195 greyhounds had been placed with GAP. The GAP database numbers indicated that 403 greyhounds retiring during the 3 years

reviewed had been placed with them.

- A review of the database of registered whelpings was performed to establish the identity of greyhounds retired from racing that were subsequently used for breeding purposes. The NZGRA database of registered greyhounds indicated that 25 greyhounds retiring during the 3 years reviewed were kept for breeding whilst the database of registered whelpings indicated that 165 had been used for breeding purposes.

It is additionally noted that a greyhound retired for breeding purposes is no longer registered as part of the greyhound industry and the outcome of these greyhounds once their breeding career is finished is unrecorded.

- A census of greyhounds kept by NZGRA licensed persons was also undertaken to establish numbers of retired racing greyhounds held by them as pets and breeding stock.

The results of the census are presented below:

Status of greyhound	Number	% of total
Racing – every dog currently racing	1,386	43.2
Retired	278	8.7
Breeding stock	242	7.6
Puppies not yet earbranded/microchipped	349	10.9
Young dogs earbranded/microchipped but not raced	950	29.6
Total	3,205	100.0

Table 7

According to the NZGRA database only 22 greyhounds retiring during the 3 years reviewed have been kept as pets or returned to their owners. The results of the census indicate that there are 278 kept by owners and trainers. Whilst the greyhounds kept by trainers or returned to owners as pets will cover greyhounds of all ages and not just those from the past three years, it suggests under-reporting in these areas.

The numbers presented below are the most detailed analysis the review team is able to provide of the outcome for greyhounds retiring from racing in the season shown. However, it is noted that there is no way of confirming the accuracy of the details recorded in the database. These numbers are the best we have been able to establish given the information deficiencies in the NZGRA database. Even with an extensive analysis of the databases, there are still a significant number of greyhounds that are unaccounted for.

Outcome as per NZGRA & GAP databases	2009/10	2010/11	2011/12	Total
Went to GAP	132	150	121	403
Returned to Australia	3	8	17	28
Kept for breeding	51	68	46	165
Kept as pet	1	11	5	17
Privately rehomed	1	4	11	16
Returned to owners	0	4	1	5
Deceased	306	218	178	702
Deregistered/Retired no further comment	325	257	158	740
Still registered to race	26	64	139	229
Total leaving the industry	845	784	676	2,305

Table 8

The key finding from this analysis is the lack of effective reporting on the outcome of retired greyhounds.

3.3.5 LACK OF EFFECTIVE REPORTING ON THE OUTCOME OF RETIRED GREYHOUNDS

The NZGRA Rules of Racing regarding the retirement of greyhounds are Rules 132 and 133. These are stated below for reference:

132. NOTIFICATION OF DEATH

132.1 Within seven days of the death of any Greyhound the Trainer shall advise the Association and return the Certificate of Registration along with a Veterinarian's, or Authorised Person's, certificate detailing the cause of death.

132.2 The Association, or appointed agent, shall have the right to order an autopsy, at the expense of the Owner, to confirm cause of death. Any person found in breach of this Rule or who knowingly participates in causing the unnatural death of any Greyhound, other than by accepted euthanasia by a Veterinarian, or other Authorised Person, is subject to a fine of up to \$10,000 and/or permanent Disqualification from involvement in any way in Greyhound Racing in New Zealand.

133. DEREGISTRATION OF GREYHOUND

133.1 A racing Greyhound can be de-registered as a racing Greyhound at any time.

133.2 A de-registered Greyhound can be sold or gifted to another party provided that suitable care and welfare will be provided and that the full identity and contact details of new Owner are provided to the Association on the prescribed form with the necessary declaration completed. The Association requires all reasonable care to be taken by the Licensed Person in selling, gifting or placing the Greyhound.

133.3 The Association, or its Nominated agent, shall have the right at any time, to demand the Greyhound be presented for inspection to confirm its well-being.

Due to a lack of compliance with these rules by industry participants and a lack of enforcement of the rules by NZGRA, there is a lack of transparency over the outcome for greyhounds leaving the racing industry. This lack of transparency is unsatisfactory and needs to be addressed.

There is a need for more responsibility to be taken by greyhound owners for their dogs. There are currently no NZGRA rules that specifically impart this responsibility. Rules 132 and 133 on deregistration do not state who is responsible for deregistering a dog. It is notable that in other jurisdictions, clear responsibility is

placed on owners for their greyhounds both during and at the end of their racing careers.

As part of the Greyhound Racing Victoria breeding education program, it is stated that , “Under the Rules of Greyhound Racing you are responsible for the greyhounds you own and you are required to think and act in a mature way when considering the future of your greyhounds if and when they retire as racing or breeding greyhounds.”

The message must be communicated to breeders that simply passing responsibility for unsuccessful litters on to GAP or some other NZGRA funded scheme, or worse, euthanizing them, is not a sustainable solution for the industry.

The focus of NZGRA has been on the racing life of the greyhound and not the periods before or after racing. The objective for the whole industry, however, should be to implement a regime whereby, through registration, record keeping and tracking, the identity and location of a greyhound is known from birth until retirement, including what happens to each greyhound at the point of retirement, whether retirement from racing or from breeding. The review team considers that individual owners and breeders must be held accountable for the welfare of their greyhounds when they leave the racing industry.

Recommendations and initiatives to rectify this are discussed in the section below on initiatives to resolve population management issues.

4. Initiatives to resolve population management issues

4.1 INTRODUCTION

This section will review and establish initiatives and recommendations to resolve population management issues through:

- Improving the tracking of greyhounds throughout their lifecycle;
- Improving breeding controls;
- Improving retirement and rehoming options;
- Considering options to extend the racing life of greyhounds;
- Amendment of euthanasia policies.

4.2 IMPROVING THE TRACKING OF GREYHOUNDS

The objective for the whole greyhound racing industry should be to implement a regime whereby, through registration, record keeping and tracking, the identity and location of a greyhound is known from birth until retirement, including what happens to each greyhound at the point of retirement, whether retirement from racing or from breeding. Database management, reporting and accountability must be improved in order to achieve this.

It is noted that Greyhounds Australasia Rule 106 requires notification of the changing circumstances of all greyhounds at any time after registration of the litter rather than after registration as a racing dog as set out in NZGRA's rules which allows for the tracking greyhounds that have not made it to the track.

It is recommended that:

- **NZGRA Rules 132 and 133 covering deregistration should be amended so that they are aligned with the Greyhounds Australasia Rule 106 and include reporting requirements for the outcome of all greyhounds from birth onwards.**
- **In order to track greyhounds that have retired from racing, Rules 132 and 133 should be rigorously enforced by NZGRA and penalties should be set at a sufficient level to act as a deterrent to non-compliance. Compliance should be monitored by following up on greyhounds that are registered but have not raced for a set period of time (e.g. 3 months).**

A registration category for greyhounds used as breeding stock should be added to allow for tracking of greyhounds that have retired from racing but are still used within the industry as breeding stock. The outcome of these greyhounds when they cease to be used for breeding should be reported in line with Rules 132 and 133.

- **Kennel inspections performed should include a verification of the numbers of greyhounds registered as kept by owners or trainers. This should include greyhounds whelped but not yet registered to race, racing greyhounds, breeding stock and retired greyhounds kept as pets.**

Audits of greyhounds registered as privately rehomed should also be performed to verify their

whereabouts. Penalties should be set at a sufficient level to act as a deterrent to non-compliance.

- **Reports identifying trends for the outcome of greyhounds leaving the industry, exception reports and reports of non-compliance should be created and generated as part of standard regular management reporting. Responsibility for the accuracy of the database should be delegated to specific members of staff and performance should be monitored.**

The review team is of the opinion that further transparency over the tracking of greyhounds could be achieved through the registration of all greyhounds with local councils.

Section 42 of the Dog Control Act 1996 requires all dogs to be registered. There is no requirement under NZGRA rules for racing greyhounds to be registered with their local councils.

Concerns relating to this approach have been raised to the review team by various parties, including the Animal Control Officer that we interviewed.

It is noted that the requirements of the Dog Control Act 1996 are enforced by local councils, with no central enforcement or administration process. This results in differing procedures in each locality. For example, the fees to register a dog vary significantly across New Zealand with some jurisdictions charging no fee for multiple dogs, others charging upwards of \$100 for each dog.

During the review we were also made aware of individual arrangements being made between owners or trainers and local councils whereby an agreement would be made to register a certain number of dogs. Furthermore, it was also noted that dogs registered names and racing names are not necessarily the same. These factors complicate matters for NZGRA to have a centralised approach to dog registration and reduce transparency over the actual greyhound population numbers.

In order to rectify this situation, it is recommended that:

- **NZGRA consults with the Department of Internal Affairs over the classification of racing greyhounds under the Dog Control Act and the provisions for potentially registering them as working dogs or otherwise. The results of this consultation should provide clear guidance to the industry and its participants on their registration obligations under the Dog Control Act.**

Based on these results, NZGRA should include in its rules requirements for its participants to comply with the Dog Control Act. Such rules should be monitored either through the kennel inspection process or through the race day identification checks that are already performed.

4.3 IMPROVING BREEDING CONTROLS

The NZGRA Rules of Racing include breeding regulations covering, inter alia, the registration and DNA testing of all greyhounds to be used for breeding in New Zealand. There are no controls or regulations in place over controlling the numbers or quality of greyhounds bred. As highlighted in section 3.3.1 above, approximately 35% of all greyhounds bred do not make it to the track. This suggests a need for more control over the numbers and quality of greyhounds bred is required to reduce the numbers of greyhounds leaving the industry.

As far as we are aware, there is no legislative ability for the NZGRA to restrict such numbers or quality of greyhounds being bred. Discussions with equine racing codes in New Zealand and greyhound racing codes

in other jurisdictions have indicated that attempts to restrict the number or quality of breeding have fallen foul of both restraint of trade and human rights legislation and we have identified no other such regulations in other jurisdictions. This creates a significant dilemma for the industry. The numbers of greyhounds being bred, specifically for racing purposes, but subsequently not making it to the track, is a significant concern for the industry. However, there is little legislatively that NZGRA can do about it.

Significant amounts of research into breeding have been undertaken in Australia and some of the key points identified by that research are presented below.

A research paper by Dr Peter Symons BVSc, BA (English), Racing and Wagering Western Australia Racing Veterinarian from 2012 entitled "Reducing the incidence of 'unsuccessful' (those that never race) animals" incorporated the following findings and conclusions:

- Racing necessarily involves the breeding of animals in excess of the number required to conduct race-meetings. Inevitably, some will not make the grade due to:
 - Death, disease, accidents or injuries;
 - Lack of ability;
 - Poor quality rearing and/or education and/or training;
 - Lack of effort; for example, with preparation of greyhounds with unpopular blood-lines;
 - Economic factors;
 - Bad luck, and other factors.
- There is a lower chance of 'success' with the offspring of dams with low earnings. This is a single, significant fact that all breeders can access. From the dam earnings you can predict, with 75% certainty, the born:start percentage of a litter. Low earnings, of the dam, indicate a low likelihood that her offspring will eventually start in a race.
- In addition to the above, there has been further important research performed by Dr Linda Beer at Greyhound Racing Victoria. She found that if a bitch's first two litters have been relatively unsuccessful, there is a low chance that it will improve in subsequent litters.
- Reducing the numbers of 'unsuccessful' greyhounds seems to be an achievable objective. It will occur if there is less breeding with bitches:
 - That have low life-time prize-money earnings; and/or
 - Whose first two litters have been relatively unsuccessful.

To achieve this aim, the best approach is education rather than legislation. A program could make it obvious to all that, economically, it makes more sense to breed with well-performed bitches; and that, morally, it is better not to breed animals that are likely to have a limited future.

The key to reducing numbers of greyhounds not making it to the track lies in improving responsible breeding in the greyhound racing industry. In 2007, Greyhound Racing Victoria set up a Responsible Breeding Task Force to recommend responsible breeding policies and practices for the future. 17 recommendations were made which were all adopted.

Resulting from this, Dr Linda Beer BVSc MACVSc (Animal Behaviour) CMAVA and Animal Welfare Manager Greyhound Racing Victoria has developed a detailed education program for breeders of greyhounds, incorporating registration of breeding facilities, assessment procedures and, importantly, educating breeders on the cost of rearing a litter. Furthermore, proactive monitoring and follow-up are undertaken where unsuccessful litters are whelped.

As a result of this program, the numbers of litters bred in Victoria reduced from 1,222 in 2008⁶ to 898 in 2012⁷, a reduction of 26%.

This education program has now also been adopted by the greyhound racing jurisdictions in Tasmania and South Australia.

It is recommended that:

- **NZGRA should introduce a breeding registration and education program which will include registration of breeding facilities, education in breeding techniques, difficulties and costs, and assessment procedures for registration of breeders. Furthermore, proactive monitoring and follow-up should be undertaken where unsuccessful litters are whelped.**

As such a program has already been developed in Victoria and shown signs of success, it is recommended that NZGRA liaises with Greyhound Racing Victoria with a view to adopting their program. The program should include monitoring of breeding practices and actions to be taken if those practices are found to be unsatisfactory.

Further issues and recommendations relating to breeding have been identified and are summarised below:

- Subsidies are paid for breeders to register a stud dog in New Zealand. The cost of registering a stud dog with Greyhounds Australasia is AUD 1,000 but the fee charged by NZGRA is NZD 115 with the remainder subsidised by NZGRA. It is noted that NZGRA has considered the appropriateness of this subsidy but has awaited the recommendations of this report before proceeding with any actions. In a situation when there is already an oversupply of greyhounds, it is not appropriate to encourage further breeding to take place.
- During meetings with Greyhound Racing Club Vets and GAP Kennel Managers, concerns were raised over greyhounds being bred with inherited disorders such as pannus and auto-immune disease. There are no statistics to highlight the incidences of these and potentially other inherited disorders and further discussion with the Massey University Professor of Veterinary Science again raised the question of the lack of research into the prevalence of such disorders.

Minimum Standard 7 of the Animal Welfare (Dogs) Code of Welfare 2010 issued by the Ministry for Primary Industries states that “Breeders must make all reasonable efforts to ensure that the genetic make-up of both sire and dam will not result in an increase in the frequency or severity of known inherited disorders.” It is also noted that Greyhounds NSW has issued a fact sheet relating to pannus⁸ in which it is recommended that affected dogs should not be used for breeding.

It is recommended that:

- **There should be no subsidies for breeding paid in a situation when there is already an oversupply of greyhounds.**
- **NZGRA should incorporate Minimum Standard 7 of the Animal Welfare (Dogs) Code of Welfare 2010 issued by the Ministry for Primary Industries on inherited disorders in its own breeding**

⁶ <http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/111>

⁷ <https://fasttrack.grv.org.au/ViewLitters>

⁸ [http://www.thedogs.com.au/Uploads/Userfiles/111208-VetFactSheet-Pannus\(1\).pdf](http://www.thedogs.com.au/Uploads/Userfiles/111208-VetFactSheet-Pannus(1).pdf)

regulations and ensure that new education programs developed for breeding include education on inherited disorders.

4.4 IMPROVING RETIREMENT AND REHOMING OPTIONS

This section will review the Greyhounds as Pets (GAP) program, other rehoming opportunities and funding requirements for the rehoming of retired greyhounds.

The GAP Program

The GAP program was established as an independent trust by NZGRA in 2005 to find homes for greyhounds when they had finished racing. Since its operational inception in 2006, 973 greyhounds have passed through the GAP program entered by a total of 170 persons. Our analysis of the seasons from 2009/10 to 2011/12 noted that during that time 532 greyhounds entered the GAP program via trainer entry and a further 33 welfare entries were entered into the program. Of these 565 greyhounds 84 (14.9%) greyhounds failed the temperament testing. Of these, 73 greyhounds (12.9% of the total entries) were euthanized and 11 were returned to their owners or trainers.

Other charities and rehoming organisations also operate with no involvement from NZGRA. However, this section will concentrate on rehoming through the GAP program.

The analysis shown on Tables 3 and 6 above indicate that 2,305 greyhounds have retired from racing during the time period from the 2009/10-2011/12 seasons and an approximate additional 750 greyhounds (250 per year) have not made it to the track.

On this basis, less than 20% of the greyhounds leaving the industry are being rehomed through the GAP program. There is a need for this number to be increased if the number of greyhounds being euthanized at the end of their careers is to be reduced.

Whilst the success of the GAP program is not in doubt, there are some areas of concern that have been raised during the review. These concerns are noted below:

- In 2012 GAP received \$162,000 in funding from NZGRA (\$158,000 in 2011) and received approximately \$50,000 in private donations. It is noted that the donations received from NZGRA total 0.8% of NZGRA's revenue for the year.

The Director of GAP has presented the review team with a business case with the requirements for rehoming 500 greyhounds a year, a number that GAP sees as feasible. The review team has not sought to evaluate or verify the figures presented in this business case. However, it is noted that the business case envisages the purchase of a kennel base with facilities for 60 greyhounds and an ongoing funding requirement of \$436,000 per year.

- GAP does not have its own kennel base. It has 20 kennel spaces in two commercial boarding kennels which naturally restricts the numbers of greyhounds that can pass through the program. This situation also restricts the GAP program from being able to develop fully its own strategies for growing the rehoming program as it is, of necessity, required to take into account the commercial interests of the kennels used. Again, this is not a criticism of the boarding kennels, merely a statement of the reality of the current structure of the GAP program.
- GAP representatives and a number of trainers interviewed raised concerns about the temperament testing process in that there is not enough time given to greyhounds to reacclimatise to non-racing

kennel conditions prior to the temperament testing being performed. It was noted that ideally the greyhounds would be kept in a 'holding kennel' type arrangement for up to two weeks to allow them to become acclimatised before temperament testing occurs. The current resourcing arrangements do not allow for such time to be spent. In respect of this, it is noted that Greyhound Racing NSW provides information to trainers on how to prepare greyhounds for GAP and the GAP program itself provides a number of foster homes to allow some of its greyhounds to acclimatise to a non-racing environment prior to rehoming.

- A number of trainers interviewed spoke of their frustrations at the time it takes to have a greyhound enter the GAP programme. As the 2012 GAP Annual Report states "The waiting list for entry varies, averaging around 16 weeks depending on the time of year. More Licenced Persons are entering their dogs before they finish racing effectively reducing the waiting time. This can however increase the waiting list significantly for those who do not plan ahead." It is noted that the GAP program encourages early registration of greyhounds into the program to alleviate this issue.

In order to resolve these concerns, it is recommended that:

- **NZGRA enters into formal strategic planning discussions with GAP in order to develop a formal rehoming strategy to ensure that the maximum feasible number of greyhounds can be rehomed and to ensure that appropriate funding is available to allow for the realisation of this strategy. The 500 greyhounds per year that GAP estimates it could rehome should be the initial target for these discussions.**
- **The GAP program encourages early registration of greyhounds into the program to alleviate the issue of waiting times to enter the program. It is recommended that further communication of this is made to owners and trainers to increase their awareness of the GAP entry procedures.**

Other Rehoming Opportunities

Up to now there has been little exploration by NZGRA of potential rehoming opportunities outside the GAP programme although it is noted that NZGRA has made preliminary investigations into creating post-racing options as disability assistance dogs or in prisoner rehabilitation programs.

Even with a potential increase in numbers rehomed by GAP there will be a need for further rehoming strategies to be established.

It is noted that Greyhound Racing Victoria and certain States in the USA have implemented schemes working with Prisons in a Prison Pet Partnership. The Department of Justice in Victoria describes the Prison Pet Partnership as "a highly successful program using pet ownership to help rehabilitate and rebuild the lives of prisoners while retraining retired greyhounds so they can be adopted as pets into loving homes" The Minister for Racing in Victoria also described the program in the following terms "The Prison Pet Partnership is an excellent program that not only helps with the rehabilitation of prisoners, but also assists the Greyhound Adoption Program in retraining greyhounds before they are adopted into homes when their racing careers are over." It is noted that more than 250 greyhounds have been rehomed in this program in its five years of existence.⁹

Considering the success of this scheme in Victoria, it would seem appropriate to assess whether such a

⁹ <http://www.justice.vic.gov.au/find/news/prison+pet+partnership+celebrates+fifth+birthday>

scheme would be feasible in New Zealand.

It is recommended that:

- **NZGRA should develop further rehoming strategies such as disability assistance dogs, prisoner rehabilitation programs, retirement kennels and other post-racing options in order to reduce as far as possible the numbers of greyhounds being euthanized.**

Funding Rehoming Opportunities

It is clear that increasing rehoming options will need significant amounts of funding and a change in the current mix of funding will be required. The specific amounts required for funding will need to be determined as part of the development of rehoming strategies. It is the opinion of the review team that the onus for funding rehoming schemes for retired greyhounds must rest as much with the owners of greyhounds as with the NZGRA.

It is recommended that:

- **Increases in registration fees should be considered or a 'Kiwisaver' type approach with a set dollar value paid by the owner matched by NZGRA for rehoming at the end of the racing career. These funds could then be used to provide additional funding to GAP and other rehoming schemes. Greyhound owners keeping their greyhounds as pets in retirement could be entitled to receive the funds in return for sufficient evidence that they have appropriately discharged their obligations with regard to their greyhounds.**

4.5 OPTIONS TO EXTEND THE RACING LIFE OF GREYHOUNDS

The opinion of the review team is that extending the racing life of a greyhound is one way of improving welfare through reducing the numbers leaving the industry and requiring rehoming. An analysis of the age of greyhounds on their retirement and the lengths of their racing careers is shown below for greyhounds that finished racing in the noted years:

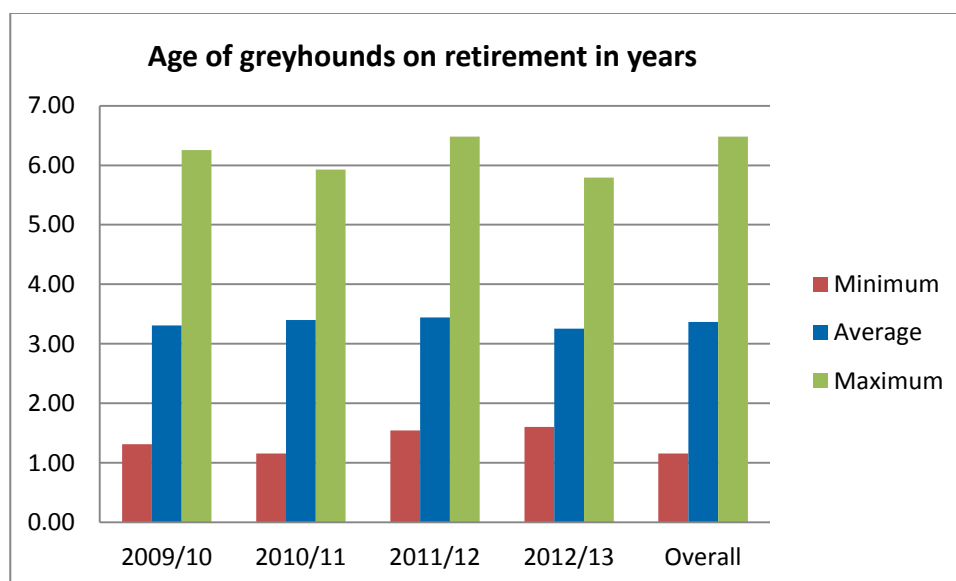


Table 9

Over the course of the four years analysed, the trends show a high level of consistency with the average and median retirement age over the 4 years of 3.37 years.

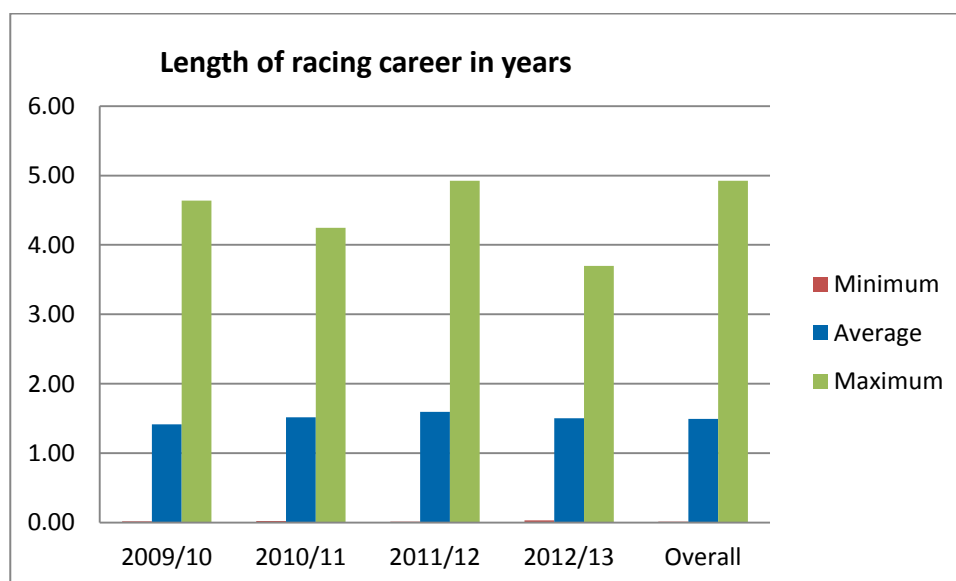


Table 10

The length of racing careers is also consistent over the 4 years with an average racing career of 1.5 years and a median racing career of 1.46 years.

We have not had the possibility to benchmark this figure reliably against other jurisdictions but it is clear that the duration of the racing life of a greyhound is only a small part of its expected natural lifespan.

Methods of increasing the lengths of racing careers have been considered by the review team as follows:

Veteran Races

It is noted that in other jurisdictions veteran races are and in the past in New Zealand have been run. Participants in the industry were asked their opinions on whether the introduction of more such races could be successful increasing the lengths of racing careers.

The responses, however, were not strongly in favour of this:

- In the overseas jurisdictions questioned, it was noted that veteran racing has not been a particular success and whilst there are races, these have not become as successful as was originally hoped.
- Two of the three club vets questioned were not in favour of veteran races due to possible increase in risk of injury.
- Responses from trainers as to whether they thought veteran races would be a good idea were as follows:

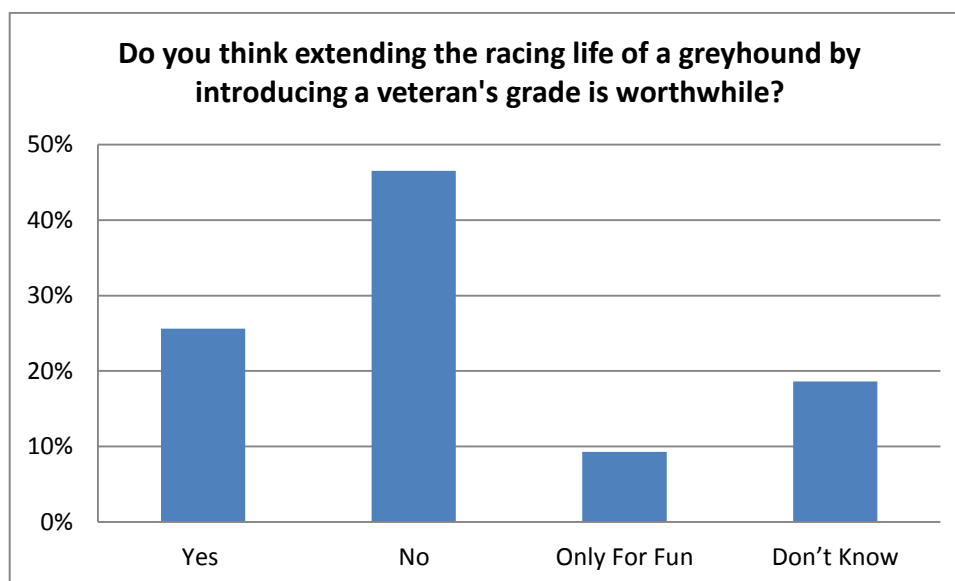


Table 11

The main reasons given for the 'no' answers related to concerns for the increased likelihood of injury and the fact that there are already too many greyhounds racing.

On the basis of these results, it would appear unlikely that the introduction of a veteran's grade for racing would be successful.

Grading processes

A number of comments were made to us by industry participants regarding the grading process applied in New Zealand and the ease with which greyhounds can climb through the grades – needing just one win to be moved up a grade – but the difficulty of moving back down them. It is noted that a greyhound needs to be unplaced four times at a particular grade before being downgraded. However, selection policies mean that after the third unplaced race, it is very difficult for a greyhound to get a start in a race. A number of trainers noted how greyhounds that are fully capable of racing become uncompetitive at the grade they are in but are unable to move down a grade.

A number of further comments were made regarding how lower grade greyhounds become uncompetitive as they are racing against new dogs (including imported dogs) that are much faster but racing at the same level as them.

It is noted that in Victoria a 'Tier 3' racing grade has been created under a half-stakes concept where greyhounds are required to run slower than a set qualifying limit to be eligible. According to representatives from Greyhound Racing Victoria, this program has been a great success.

It is recommended that:

- NZGRA considers potential amendments to its grading process. NZGRA should correspond with Greyhound Racing Victoria to gain an understanding of the processes that have been implemented there with the aim of ensuring greyhounds are able to remain competitive at a suitable grade. It is noted that by having a more competitive lower grade, a review of the current petrol voucher scheme of \$40 paid for each unplaced greyhound could be undertaken to provide funds to support such an initiative.**

4.6 AMENDMENT OF EUTHANASIA POLICIES

Reducing Euthanasia

Dr John Hellström, Chairperson of the National Animal Welfare Advisory Committee (NAWAC) in his letter to the Parliamentary Select Committee on Government Administration states¹⁰:

“There are two generic welfare issues that apply to many aspects of animal use that are relevant... euthanasia of unwanted animals considered of limited usefulness to the activity and the risk of injury to the animals arising from the use. These two issues are of worldwide concern for both the horse and greyhound racing industries and there is some evidence that the ethical position of some societies is becoming more opposed to these uses.”

As noted in section 3.3.4 above, the review team not been able to assess fully the outcome for retiring greyhounds. It is, however, evident that 30% of greyhounds retiring between 2009/10 and 2011/12 are recorded as deceased (although this number will include deaths through injury, accident and illness) and the number is potentially significantly higher with the significant number of retired greyhounds and those not making the track that have not been effectively tracked. The review team does not consider this situation to be sustainable for the industry.

Through initiatives suggested above of reducing breeding numbers, extending the racing life and increasing rehoming opportunities, the numbers of greyhounds being euthanized should be able to be significantly reduced.

During our review we asked owners and trainers if they have ever had a healthy greyhound euthanized. The response was that 77% have had a healthy greyhound euthanized. The principle reason given for euthanizing healthy greyhounds was unsuitability to be a pet which was given by 67% of the respondents that have had a healthy greyhound euthanized.

It is noticeable that the frequency of this occurrence varied from trainer to trainer with some saying it is very rare to have a greyhound that is not suitable to be a pet with another stating as many as 20% are not suitable.

Of further note was the fact that the GAP Kennel managers were not convinced that trainers know which greyhounds will make suitable pets. Whilst we have not found any clear cut statistics on how high the rate of greyhounds unsuitable to be pets can be expected to be, there is concern that this may be used as a convenient excuse to dispose of an unwanted greyhound. The APGAW report into greyhound welfare performed in the UK in 2007 states that the Retired Greyhounds Trust in the UK estimates approximately 4% to 5%¹¹ whilst GAP in New Zealand has a failure rate of approximately 13%.

The responses to this question also suggest that nearly a quarter of trainers have never had a healthy greyhound euthanized. It is the opinion of the review team that inevitably some greyhounds will have to be euthanized for a variety of reasons such as those unsuitable for rehoming as a pet.

¹⁰ Letter to Hon Ruth Dyson on 2 May 2013 **Re: Petition 2011/49 of Aaron Cross on behalf of the Greyhound Protection League of New Zealand**

¹¹ The Welfare of Greyhounds, APGAW May 2007 p.22

However, 30% of greyhounds leaving racing between 2009 and 2012 are recorded as deceased by NZGRA with the potential for this number to be significantly higher with the significant number of retired greyhounds and those not making the track that have not been effectively tracked. In terms of the social acceptability of the sport, the review team is of the opinion that the current situation is not sustainable for the industry and needs to change.

In the UK under GBGB Rule 18 euthanasia is seen as a last resort and monitoring of euthanasia is undertaken to identify exceptions to be investigated.

Rule 18 in the GBGB Rules of Racing states:

i The Greyhound Regulatory Board shall hold the last registered Owner to be responsible for the welfare of a Greyhound and also for making acceptable arrangements for his/her retired Greyhound as follows :-

- a The Greyhound be retained as a pet, or*
- b the Greyhound be boarded at a Licensed Kennel, or*
- c the Greyhound be boarded at a Kennel licensed by the local authority, or*
- d the Greyhound be found a home through the Retired Greyhound Trust, or*
- e the Greyhound be sold or found a home, responsibly, or*
- f if it is necessary for the Greyhound to be euthanased either on humane grounds or because none of the above options are available, the Owner ensuring, subject to Rule 58, that such euthanasia is carried out by a registered Veterinary Surgeon.*

ii A registered Owner shall inform the GBGB if there is any change in ownership of a registered Greyhound, and whether or not it is intended to enter it in any Trial or Race again (see Rule 20). A registered Owner shall also report, or arrange for a licensed Trainer to report on his/her behalf, the retirement of a Greyhound which it is not intended to enter in any Trial or Race again, or any subsequent "Comeback" from a previously reported retirement, to the Racing Manager of any GBGB Licensed Racecourse and shall be given and retain a receipt in the form of a copy of a Greyhound Detail Report prepared under Rule 195(ii) and Rule 194(vii).

iii Failure to give notification under Rule 18(ii) within 28 Days of the Change of Ownership shall result in a penalty being levied and may result in the Greyhound Regulatory Board, Director of Regulation or if the matter is referred to it, the Disciplinary Committee prohibiting an Owner from registering Greyhounds unless the Owner is able to satisfy the Greyhound Regulatory Board, Director of Regulation or if the matter is referred to it, the Disciplinary Committee that any future retirement of a Greyhound in his/her charge will be strictly in accordance with Rule 18.

It is recommended that:

NZGRA should introduce a rule such as GBGB Rule 18 where the onus for the welfare of a retiring greyhound is firmly placed on the owner of the greyhound and euthanasia is only considered acceptable as a last resort. Monitoring of euthanasia cases and trends should be undertaken to identify cases where individuals are potentially abusing the letter and spirit of the rule and appropriate investigation of such cases should be undertaken.

Euthanasia Policy

There is currently no clear strategy or policy on the euthanasia of greyhounds. NZGRA Rule 132.2 permits "euthanasia by a Veterinarian, or other Authorised Person". There is however, no definition of who the "other Authorised Persons" are.

It is however noted that:

- The Animal Welfare (Dogs) Code of Welfare 2010 states on page 39 that “The preferred method of euthanasia for dogs is by a veterinarian using an intravenous injection of a drug registered for this purpose.”
- Greyhounds Australasia has a rule in place under which only a veterinarian is permitted to euthanize a greyhound, except in situations to prevent unnecessary pain or suffering. This rule has been adopted by all of the three of the Australian jurisdictions reviewed during this review (those in Victoria, NSW and Tasmania).
- Rules in the UK and Ireland also require euthanasia to be carried out by a veterinarian other than in situations to prevent unnecessary pain or suffering.

There is a clear consensus across greyhound racing jurisdictions and in the New Zealand Code of Welfare that euthanasia should only be administered by a vet other than in cases of emergency.

It is noted that NZGRA has tried to change this rule for the past two years to remove the ‘other authorised persons’ but that the motion has been voted out at the NZGRA’s AGM on both occasions.

However, when such cases arise, it should be ensured that such euthanasia is only performed by a veterinarian as per the Animal Welfare (Dogs) Code of Welfare 2010 and the Greyhounds Australasia rules.

It is recommended that:

- **Rule 132.2 should be amended to ensure that other than in cases of emergency, only a veterinarian should be allowed to perform euthanasia. Enforcement and monitoring of this should also be performed.**

Cases of emergency euthanasia by parties other than veterinarians should require appropriate evidence of the situation to be provided to NZGRA and cases should be monitored for potential abuse of the rules.

5. Welfare Standards

5.1 INTRODUCTION

This section of the report will cover the welfare standards relating to greyhounds and will consider:

- Current welfare standards in place;
- The enforcement of welfare standards;
- Awareness of welfare standards.

5.2 SUMMARY OF MAIN FINDINGS

- The review team found little evidence of issues relating to the care of greyhounds during their racing careers.
- There are no formal minimum standards of welfare in place. The NZGRA has Operational Guidelines but these have not been approved by any external welfare bodies and are not enforced in the NZGRA's rules.
- There is a lack of monitoring and enforcement of welfare standards.
- There is a lack of awareness of welfare standards amongst industry participants with 40% of existing trainers unaware of the NZGRA's Animal Welfare Policy and 35.5% unaware of NZGRA's Operational Guidelines.

5.3 DETAILED RESULTS AND FINDINGS

5.3.1 CURRENT WELFARE STANDARDS

The review team found little evidence of issues relating to the care of greyhounds during their racing careers. Our interviews with participants in the Greyhound Racing industry highlighted that many owners and trainers are committed to the welfare and safety of their dogs and care passionately about them throughout their lives. It is notable that, as far as we are aware, there has never been a conviction of a licenced person under the Animal Welfare Act. Whilst there will always be exceptions in any diverse community, it is our conclusion that, on the whole, racing greyhounds during their career are well looked after and cared for.

However, there are no formal minimum standards of welfare in place. The NZGRA has Operational Guidelines but these have not been approved by any external welfare bodies and are not enforced in the NZGRA's rules.

The Operational Guidelines include recommendations for kennel standards, transportation and standards of care for greyhounds. These recommendations are very similar to those prescribed in other greyhound racing jurisdictions such as Victoria, New South Wales and the United Kingdom. However, it is noted that in these jurisdictions, these standards are prescribed minimum standards incorporated into the rules of those jurisdictions. In New Zealand these guidelines are not formally defined minimum standards.

It is noted that the Animal Welfare (Dogs) Code of Welfare 2010 contains minimum standards for, inter alia, kennelling, ventilation, shelter, transportation, nutrition, health and sanitation. It is noted that failure to meet a minimum standard in the code could lead to legal action being taken. The NZGRA Operational Guidelines

were issued in 2007 and have not been benchmarked against the Code of Welfare.

There is a need for formal standards that have been approved by external welfare bodies and are built into rules that can be enforced.

5.3.2 ENFORCEMENT OF WELFARE STANDARDS

NZGRA has a service agreement in place with the Racing Integrity Unit (RIU) which in Schedule 1 (s) outsources the monitoring of welfare and in Schedule 1 (b) outsources the enforcement of the Rules of Racing to the RIU.

The RIU is contracted to undertake unannounced and periodic kennel inspections in Schedule 1(q) of the Service Agreement. The number of kennel inspections undertaken by the RIU between 1 February 2011 and 6 March 2013 can be seen below:

RIU inspections from Feb 2011 to 6 March 2013		
No of premises	No of inspections performed	%
80	0	41
76	1	39
29	2	15
8	3	4
1	4	1
194	Total	100

Table 12

It is noted that in cases where there are welfare concerns, NZGRA can request visits to be carried out or these will be initiated by the RIU itself and this will help to explain those premises visited on multiple occasions.

A total of 162 kennel inspections have been performed over the 2 year period which covered 59% of licensed trainers' properties and approximately 70% of the racing population.

Whilst the definition of periodic lends itself to some interpretation, it is of note is the fact that 41% of kennels have not been inspected over the two year period in question and there are no formal schedules plans to indicate when these premises will be visited. It is also noted that only licensed trainers are subject to kennel inspections. There is also a small number of greyhound breeders who, whilst licensed by NZGRA as owners of greyhounds, are not subjected to inspections. Our correspondence with other jurisdictions has noted that:

- In NSW, all professional trainers have their facilities inspected annually and owner trainers once every two years.
- In the UK, all trainers properties are inspected twice every year with the inspections recorded by video camera and additionally a veterinary check must also be performed.

It is also noted that RIU stewards are not necessarily experts in the performance of kennel inspections and there are currently no formal guidelines in place for the performance of a kennel inspection. Their primary role is to act as race day stewards and, due to the RIU being responsible for all three racing codes, some stewards are specialised in the equine codes rather than the greyhound code. Some doubts were raised by

greyhound trainers during our review over the quality of the reviews performed and over the priority placed on them by the RIU.

Whilst the RIU would not be expected to identify all welfare issues during their kennel inspections, it is clear that there are more expectations, including from the trainers who are inspected, for more rigorous and regular inspections to ensure that welfare standards across the industry are being evaluated and enforced. These concerns need to be addressed by NZGRA.

It is noted that the Service Agreement with the RIU states that kennel inspections should be unannounced. From the responses received it is clear that this is not always the case in practice. In order to ensure a robust inspection process, it is the opinion of the review team that as far as possible inspections should be unannounced.

Further concerns were raised over the quality and accessibility of inspection reports created. There is currently no formal reporting between the RIU and NZGRA over the number of kennel inspections performed, any issues identified and no way for the NZGRA to access the reports.

In conclusion, the service level agreement that the NZGRA has in place with the RIU is inadequate with regard to the enforcement of welfare rules. Additionally there are concerns over the levels of service provided by the RIU and there is a lack of service level reporting provided.

5.3.3 AWARENESS OF WELFARE STANDARDS

As part of our interview process, we asked industry participants, administrators and stakeholders if they were aware of NZGRA's Animal Welfare Policy. For the purposes of the table below, NZGRA Board Members, NZGRA staff, Club Officials, Club Vets and RIU stewards have been group as Administrators and trainers as Participants.

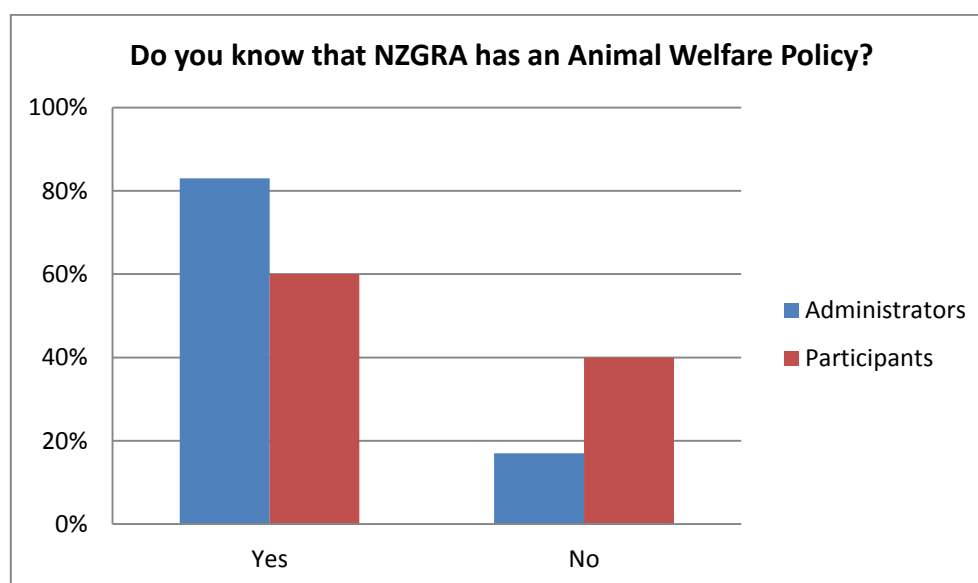


Table 13

It is noticeable that 40% of trainers interviewed did not know that NZGRA has an Animal Welfare Policy. The Animal Welfare Policy is communicated on NZGRA's website and in its annual report but there is still clearly an education and communication gap that needs to be bridged.

Additionally during our interviews with licensed trainers, trainers, we asked whether trainers were aware of

the NZGRA's Operational Guidelines. The results are summarised below:

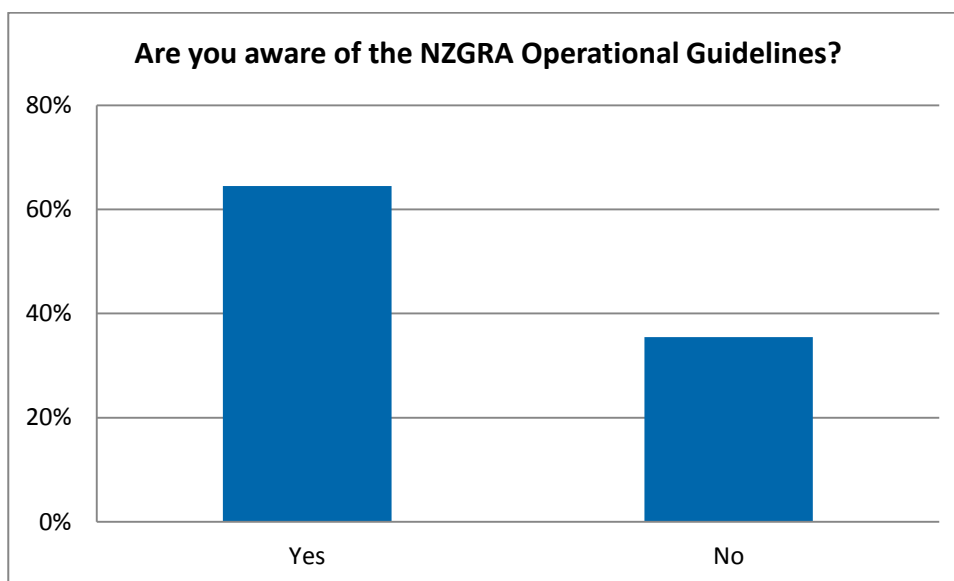


Table 14

35.5% of respondents were not aware of the NZGRA Operational Guidelines which provide expected standards for welfare within the Greyhound Racing industry.

There is a need for more education and communication of welfare matters, policies and procedures to participants in the greyhound racing industry.

Recommendations and initiatives to improve welfare standards are discussed in the section below on initiatives to resolve issues relating to welfare standards.

6. Initiatives to resolve issues relating to welfare standards

6.1 INTRODUCTION

This section will review and establish initiatives and recommendations to resolve issues relating to the content, enforcement and awareness of welfare standards through:

- Improving the current welfare standards;
- Improving enforcement of welfare standards;
- Improving awareness of tracking of greyhounds throughout their lifecycle.

6.2 IMPROVING CURRENT WELFARE STANDARDS

The review team is of the opinion that NZGRA should develop welfare standards that are in line with current expected standards of animal welfare, are approved by appropriate animal welfare bodies and are enforceable in the rules of NZGRA.

In order to achieve this, it is recommended that:

- **NZGRA should develop a formal code of best practices in collaboration with appropriate independent welfare organisations such as the RNZSPCA and the National Animal Welfare Advisory Committee (NAWAC) to ensure they meet expected standards. Consideration should be given to the creation of a formal Code of Welfare for Racing Greyhounds in line with other Codes of Welfare issued by NAWAC.**

A periodic review of these standards rules (for example a bi-annual review) should also be undertaken by NZGRA to ensure that these rules remain up-to-date with contemporary welfare practices.

- **It is recommended that NZGRA incorporates this new code of best practice and associated standards into its rules to enable formal evaluation against the code and standards. It is further recommended that the rules should include clearly defined penalties for non-compliance and that these rules and penalties should be rigorously enforced.**

6.3 IMPROVING ENFORCEMENT OF WELFARE STANDARDS

The review team held discussions with the RIU relating to the issues raised regarding the enforcement of welfare standards. It is noted that the RIU has recognised these issues and is currently assessing potential improvements to inspections and reporting processes such as those described below:

- Benchmarking kennel inspection standards with NSW – Professional Trainers inspected once per year, Owner Trainers once every two years.
- Standard reporting templates are now in place.
- Prioritisation of work to be refocused to recognise importance of kennel inspections as well as race meetings.
- Inspections will include a count of dogs to verify the existence of racing dogs, whelpings, breeding stock

and retired dogs reported as being kept by trainers. It is noted that reliable figures will be needed as a starting point for this.

- Improved access of current and past reports to RIU Stewards and NZGRA.
- Agreed need for inspections to be unannounced. One suggestion from a trainer was that trainers should state times they will be at home and available for an inspection (i.e. days when they are not racing and at convenient times of the day) so that there can be no issues when a surprise visit takes place. This suggestion would appear to be appropriate.

The improvements currently proposed by the RIU would appear, if fully implemented, to be appropriate to address a number of the issues raised.

In order to resolve these remaining issues, it is recommended that:

- **The service agreement with the Racing Integrity Unit should be renegotiated and should include specific key performance objectives including:**
 - **Numbers of kennel inspections performed against plan.**
 - **Explanations for kennel inspections not performed and actions to remedy non-performance.**
 - **Reporting obligations to NZGRA including requirements for detail, quality and timeliness kennel inspection reports.**
- **Formal guidelines for the performance of kennel inspections should be introduced. These should include a count and report of all greyhounds held on the property at inspection.**
- **Further liaison should take place between the NZGRA and the RIU to quantify and address any evident knowledge gap and to develop the formal guidelines for the performance of a kennel inspection. A further option to remedy this could be to review the practices in the UK whereby an annual vet inspection of each licenced property is also required.**

6.4 IMPROVING AWARENESS OF WELFARE STANDARDS

NZGRA has developed new requirements and assessments for new licenced trainers named “Owner Trainer License Requirements – Level 2” which were rolled out in April 2013 and are compulsory for all new Owner Trainer applicants. These requirements cover important welfare concerns such as:

- Kennelling;
- Nutrition;
- Healthcare;
- injuries and basic first aid;
- Pre-training and race training.

It is noted that this program of education will only impact a limited number of trainers and it will be a long term process before even the majority of trainers have undertaken this program.

NZGRA must increase awareness of welfare standards across the industry through communication, education and training. It is noted that the new assessment program for trainers will only impact a limited number of trainers and it will be a long term process before even the majority of trainers have undertaken this program.

In order to increase the awareness of welfare standards, it is recommended that:

- Existing trainers should be encouraged to undertake the training assessments in place for new trainers and further work should be undertaken to increase knowledge and awareness of industry participants of welfare minimum standards and best practices. Furthermore, all training materials, welfare standards and policies should be made easily accessible for all industry participants, for example on the NZGRA website.
- In cases where welfare issues are identified by NZGRA, consideration should be given to requiring existing trainers to undertake the training assessment in order to retain their trainer licence.

7. Track Safety Standards, Injuries and Injury Reporting

7.1 INTRODUCTION

This section of the report will cover:

- Track safety standards;
- Injuries and injury reporting.

7.2 SUMMARY OF FINDINGS

- There is a lack of research into identifying optimum track conditions and standards to reduce the number and severity of injuries incurred during racing.
- There has been a lack of rigorous formal injury reporting and there are concerns over the consistency and accuracy of injury reports.
- There has been a lack of detailed analysis of injury statistics and trends at track, trainer and individual greyhound levels to identify welfare issues.

7.3 DETAILED RESULTS AND FINDINGS

7.3.1. TRACK SAFETY STANDARDS

As noted in section 4.6 injuries arising from racing are one of the two key welfare issues raised by NAWAC. The nature of racing means that greyhounds will get injured but having safe tracks can reduce both the number of injuries and the severity of those injuries. The review team has not been able to identify any globally recognised optimum standards for greyhound racing tracks. NZGRA could, however, investigate a range of matters (in association with other jurisdictions) to make tracks safer.

There are a number of issues relating to track safety such as the optimum track surface, the optimum bend camber, distance of starting boxes to turns, the ideal number of turns on a track, the ages at which greyhounds should start and retire from racing which have not been addressed and will continue to be point of conflict until there are best practices researched and documented.

There are, however, numerous safety initiatives that are being trialled or have been implemented in New Zealand and in other jurisdictions to increase track safety and reduce the levels of injury. For example it is noted that trialling of safety padding on the outside bends of tracks is in the process of being undertaken at four selected New Zealand tracks. Examples from other jurisdictions include initiatives such as safety padding, inside barriers away from the running rail, structure of the lure, catching pens, starting box structure and box seeding of dogs in line with their running line. NZGRA has also been working with the National Sports Turf Institute to provide minimum standards of consistency of moisture content and compaction readings for each individual track and should be commended for taking this initiative into developing independently verified minimum standards for tracks.

7.3.2 INJURIES AND INJURY REPORTING

A qualified veterinarian is in attendance at every race meeting and undertakes a pre-race check of every greyhound to ensure their fitness to race. In addition, a race-day veterinarian can impose a stand-down period should a greyhound be assessed as being injured or otherwise unfit to race during a race meeting.

There has, however, been a lack of rigorous formal injury reporting up to now. There have been concerns over the consistency and accuracy of injury reporting made. Research into injuries previously performed by Massey University was limited by the injury reporting that exists. In their opinion, the quality of injury reporting ranged from inadequate to terrible, and as a result a lot of the research was speculative. It is however noted that improvements to injury reporting are in the process of being implemented.

Under the existing process, there are no standard definitions for types of injury and no indication given as to how the injury occurred, where on the track it occurred, the seriousness of the injury and the ultimate outcome. In this respect, other than informing NZGRA that an injury has occurred and the length of stand-down, there is no detailed information available to highlight trends or specific issues at tracks that need urgent attention.

The RIU has started to create more detailed injury reports on a monthly basis and send them to NZGRA. The improvements to the injury reporting which have been in development since November 2012 consist of the following changes:

- The race number is included to highlight whether track deterioration or weather conditions during the race meeting could be a contributing factor to injuries.
- A description of how the injury occurred is given.
- Timeline of the injury and section of the track where the injury occurred are given to highlight specific areas of the track where there may be an issue.
- The area affected by the injury is noted. Currently these are still completed 'free hand'. It is proposed that standard definitions will be given to injuries after discussion with NZGRA vets on such definitions.
- A grading of the injury in terms of seriousness is given.
- The ultimate outcome of the injury is given, including whether the greyhound was euthanized.

Standard definitions for injuries, however, still need to be developed.

It was also noted by Massey University that injury reporting only includes injuries occurring on the race track and there is no recording of any injuries that occur away from the track. Massey University stated that in order for them to perform detailed reliable research into greyhound injuries they would like to see a requirement for all registered greyhounds to have all vet care recorded in a central database and to be able to confirm types and causes of all injuries on a consistent basis. Ideally a web-based system with standardised terms (e.g. via a drop down) and assurance of confidentiality would be required. In order to be of optimum use to Massey University, injury reporting needs to be standardised, high quality and beyond the track.

It is of note that in the UK, out of racing injury must be reported to the racecourse racing manager and recorded in the Kennel Treatment Book, which is available for inspection by the GBGB at any time. Discussions with the GBGB Welfare Officer did however note that this rule is subject to adherence by the

trainer and monitoring and enforcement is not feasible.

There is currently no detailed analysis of injury reporting undertaken and there are no analyses in place to establish issues with particular tracks or parts of tracks, particular trainers or particular greyhounds. The improvements in the injury information collected need to be reflected in detailed management reports highlighting specific trends in injuries.

Injury Statistics per Track

An analysis of injuries recorded at race tracks since the 2008/09 season was performed during this review. Three analyses have been performed and are recorded below.

The first table shows the total number of injuries recorded at each track by percentage of starters:

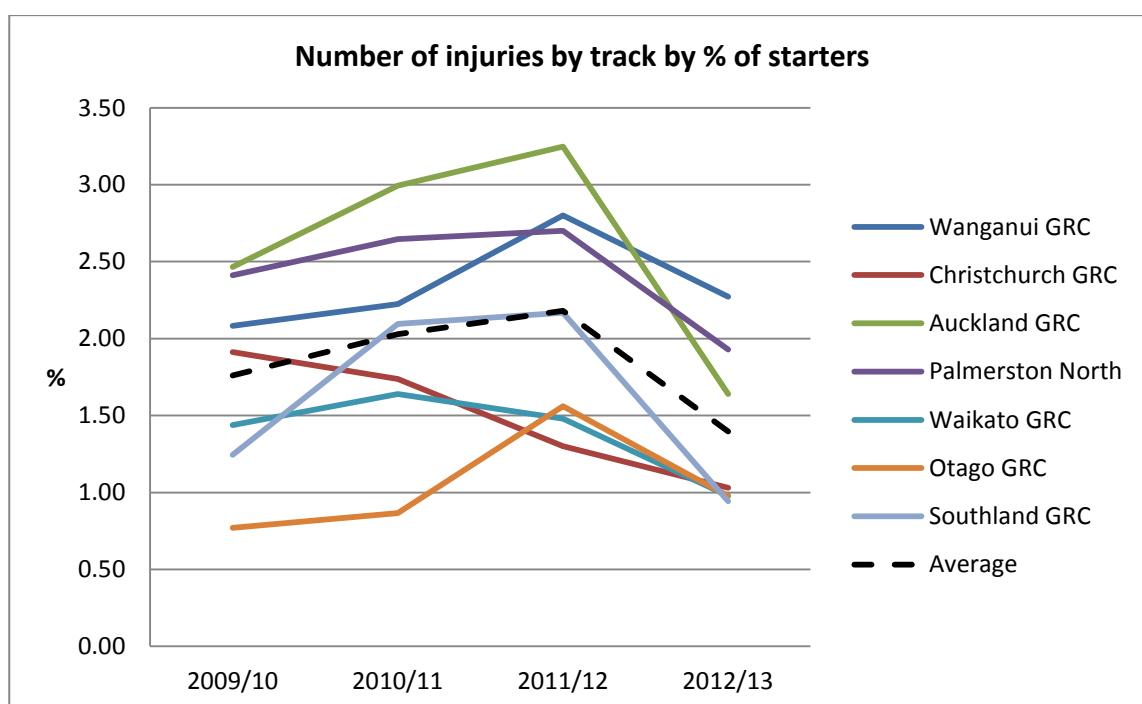


Table 15

It is noticeable that the overall injury rates have dropped in the 2012/13 season. It also however noticeable that certain tracks have far higher rates of injury than others although this could be caused by a number of factors.

The following analysis consists of injuries where the greyhound injured has never raced again. It should be noted that for the current season no consideration has been taken of greyhounds that are currently in stand-down periods and the figures naturally include greyhounds that will race again. This is assumed to be the reason for the increased rate for some tracks in 2012/13 in comparison to the previous chart.

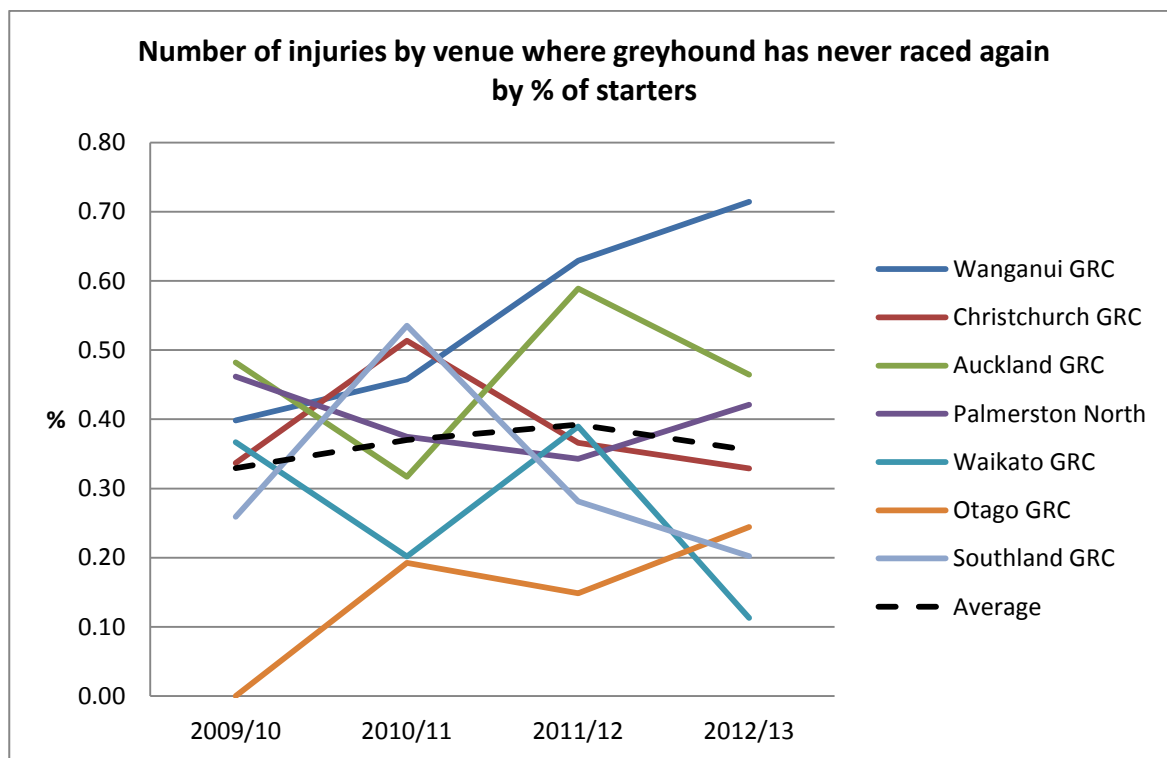


Table 16

The final analysis shows the number of injuries resulting in euthanasia at the track again by percentage of starters.

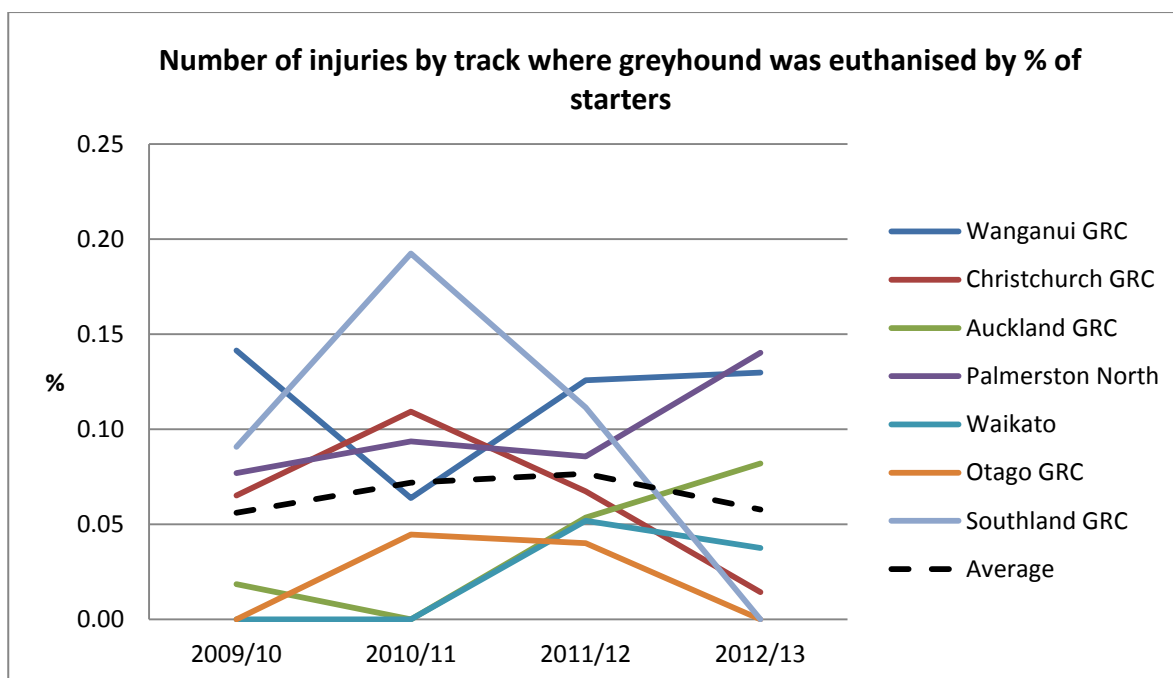


Table 17

The incidences of euthanasia in comparison to the number of starters for 2012/13 again follow the same trends as the other injury statistics.

There is a need for an ongoing review of injury statistics to be undertaken to ensure that injury trends are identified and acted upon. The RIU has started to create such reports on a monthly basis and submit them to NZGRA. There should, however, be formalised monitoring of the reports by NZGRA.

Injury Statistics per Greyhound

Prior to racing, a compulsory vet check is undertaken for each greyhound. It is however noted by the vets themselves that due to time limitations, only a cursory 30-50 second check of obvious cuts, scratches and swellings is possible and there is a reliance on trainers to bring greyhounds in a fit condition to the track.

The RIU has proposed to provide race day vets with a history of stand-down injuries over the previous 6 months so that the vets can direct their checks to specific potential injuries. Such reporting should be introduced as soon as possible.

Currently there is no statistical reporting on individual greyhounds or by individual trainers performed by NZGRA. From the injury statistics available it is possible to identify potential welfare issues. For example during the review, the review team performed the following analysis which shows one particular greyhound that has had 10 stand-down injuries between April 2010 and August 2012:

Name	Valid From	Valid To	Stand Down Days	Reason
x	18/04/2010	27/04/2010	10	Split webbing
x	16/05/2010	22/05/2010	7	Bruised toe.
x	27/05/2010	2/06/2010	7	Torn left hind pad.
x	15/08/2010	22/08/2010	8	Re-injured pad graze.
x	5/09/2010	14/09/2010	10	Skin graze on left hind leg.
x	3/10/2010	9/10/2010	7	Superficial grazes after fall.
x	13/02/2011	26/03/2011	42	Fractured toe.
x	27/01/2011	2/02/2011	7	Grazed toes and pad.
x	26/04/2012	9/05/2012	14	split webbing left hind
x	19/08/2012	28/08/2012	10	left fore split webbing

Table 18

Another example shows one particular greyhound that was stood down 7 times in the space of 6 months with what appears to be potentially the same injury:

Name	Valid From	Valid To	Stand Down Days	Reason
y	17/07/2011	21/07/2011	5	wrist pain & pectoral muscle injury
y	11/08/2011	15/08/2011	5	right fore infected dew claw
y	5/01/2012	14/01/2012	10	right metacarpal pain
y	20/05/2012	29/05/2012	10	right wrist pain & dew claw injury
y	1/04/2012	14/04/2012	14	cramp post race & right wrist pain
y	22/04/2012	5/05/2012	14	right wrist pain
y	22/01/2012	18/02/2012	28	right wrist and shoulder pain

Table 19

Several other similar examples were found and further analyses by greyhound or trainer are also possible. NZGRA should implement reporting on injuries by greyhound and by trainer in order to establish potential welfare issues.

Frequency of racing

As part of our interview process, we asked industry participants, administrators and stakeholders if they think greyhounds should be prohibited from racing too much. This was a question which provoked a significant amount of reaction from trainers with concerns raised over the frequency with which some greyhounds are raced and transported around the country. For the purposes of the table below, NZGRA Board Members, NZGRA staff, Club Officials, Club Vets and RIU stewards have been grouped as Administrators and trainers as Participants. Current rules state that a greyhound cannot race more than once in a 24 hour period.

The results were as follows:

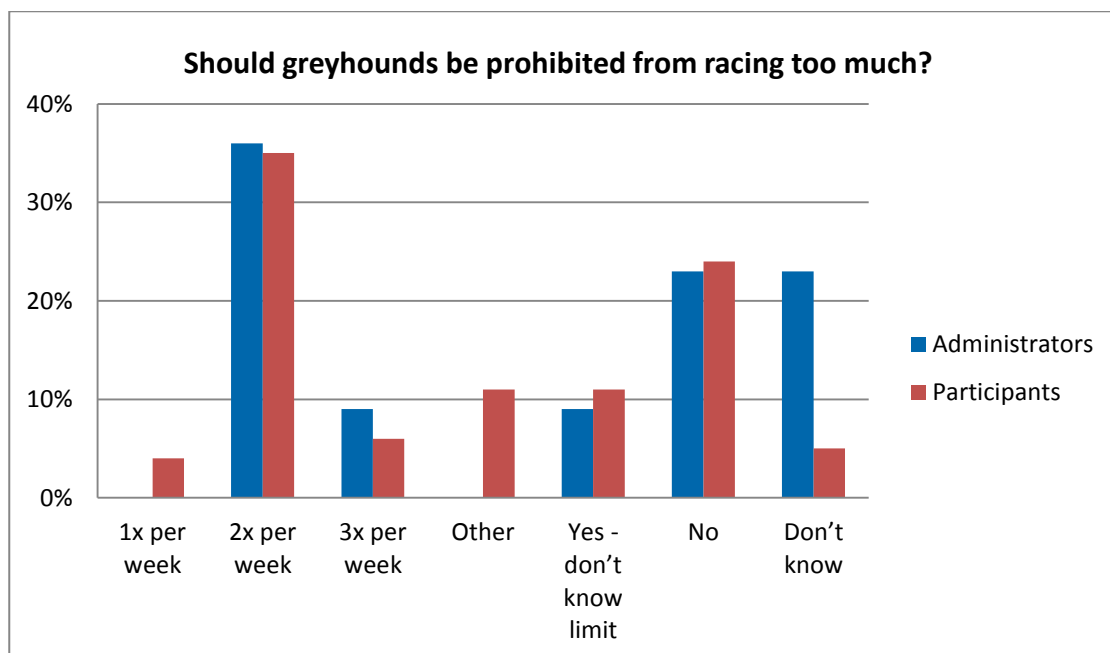


Table 20

It is noticeable that 54% of administrators and 67% of trainers felt that there should be limits on the frequency with which a greyhound is permitted to race and more than 45% of each category advocating

three times a week or less as the maximum that should be permitted.

It is noted that research into racing and injuries over a 60 day period by Massey University noted that the greyhounds running more frequently tended to have less injuries. However, it was noted by Massey University that this research covered only a 60 day period and did not consider the relationship between frequency of racing and the overall longevity of a racing career. It was also noted by the Massey University Professor of Veterinary Science interviewed that as far as he is aware, there has been no such research undertaken.

During the course of our review we were made aware of two occasions where a greyhound was racing four times in eight days or less which had involved travel from Canterbury to Invercargill to Wanganui back to Canterbury.

In discussions with other jurisdictions the following rules and practices were noted:

- In Australia there is no rule on frequency of racing but is very rare for a greyhound to race more than twice in a week.
- In the UK greyhounds can run twice a day and occasionally heats and finals for sprints may be held on the same day. On average, greyhounds race once every five days. The GBGB Welfare Officer noted that if he became aware of a greyhound racing four times in one week, he would consider this to be a welfare issue.

There has been, as far as we are aware, no detailed research undertaken into the impact of frequency of racing on the overall longevity of a racing career. Due to the lack of research and data collection in this area, the review team has been unable to reach any conclusion on this.

Vaccinations

Under NZGRA Rule 122, Vaccination Certificates, as specified from time to time by the Association, must be supplied at the time of application for name Registration. It is noted that no further production of vaccination certificates is required. Two of the club vets interviewed queried this rule stating that, for example, kennel cough vaccinations are required annually and parvovirus vaccinations every three years, yet after initial registration there is no requirement for racing greyhounds to provide evidence that these vaccinations are up to date. There is currently a resurgence of kennel cough in the New Zealand dog population.

8. Initiatives to improve track standards and injury reporting

8.1 INTRODUCTION

This section will review and establish initiatives and recommendations to resolve issues relating to track standards, injuries and injury reporting through:

- Improving track safety standards;
- Improving injury performance and reporting.

8.2 IMPROVING TRACK SAFETY STANDARDS

NZGRA has been working with the National Sports Turf Institute to provide minimum standards of consistency for each individual track and should be commended for taking this initiative into developing independently verified minimum standards for tracks.

There are additionally numerous safety initiatives that are being trialled or have been implemented in New Zealand and in other jurisdictions to increase track safety and reduce the levels of injury, for example it is noted that trialling of safety padding on the outside bends of tracks is in the process of being undertaken at four selected New Zealand tracks. Examples from other jurisdictions include initiatives such as safety padding, inside barriers away from the running rail, structure of the lure, catching pens, starting box structure and box seeding of dogs in line with their running line.

It is recommended that:

- **NZGRA should engage with the global greyhound racing bodies to develop stronger links and commit to further research that can be the foundation for decisions on issues relating to track safety and injuries, such as the optimum track surface, the optimum camber on the bends, closeness of boxes to turns, the ideal number of turns on a track, the ages at which greyhounds should start and retire from racing and how often they should race. Until this foundation exists, contradictory views between various sectors of the sport will continue to create tension and possible conflict.**
- **The research initiated with the Sports Turf Institute into minimum track standards should be completed and the minimum standards should be formalised. It is also to be recommended that the relationship with the Sports Turf Institute is not confined to a one-off exercise but that communications are maintained to ensure that developments in track design remain up to date.**

8.3 IMPROVING INJURY PERFORMANCE AND REPORTING

As noted in section 7.3.2, improvements in injury reporting are in the process of being implemented. There is however a need to ensure that the injury definitions still to be determined will be appropriate. This reporting will still only cover race day injuries and reporting of injuries outside of racing still need to be considered.

It is recommended that:

- **The improvements to injury reporting proposed and in the process of being implemented by the RIU are completed as a matter of priority. It is recommended that the standard definitions to be developed for injuries should be verified with both NZGRA vets and Massey University.**
- **NZGRA should investigate the feasibility of having all veterinarian care for greyhounds recorded in a central database and to be able to confirm types and causes of all injuries on a consistent basis. At the very minimum the possibility of obtaining out-of-racing injuries should be considered although the review team accepts it will be very difficult for NZGRA to ensure completeness of reporting.**

Once appropriately detailed injury reporting has been implemented it will be necessary for reporting to be implemented to identify specific welfare issues.

It is recommended that:

- **NZGRA should consider the types of statistical reporting on injuries and injury trends that would be of use in identifying potential welfare issues and implement such reporting on a regular basis. These reports should include:**
 - **Injury trends at particular tracks and parts of tracks e.g. specific corners of the track or deterioration of track conditions throughout the race meeting**
 - **Injury trends relating to individual greyhounds and trainers which could highlight specific trends and will allow for trends to be established where trainers and greyhounds operate at several different tracks.**

Formal monitoring processes to follow up on issues identified should be introduced and specific actions should be undertaken where issues are identified.

With regard to vaccinations it was noted that Club vets would like to see vaccination certificates supplied on an annual basis to ensure that all racing greyhounds are fully vaccinated at all times. The review team considers this to be an appropriate course of action.

It is recommended that:

- **NZGRA should liaise with NZGRA vets to establish which vaccinations are required to be kept up-to-date. These requirements should be included in the animal welfare procedures to be implemented by NZGRA. Vaccination certificates could be supplied to NZGRA on an annual basis to ensure that all racing greyhounds are fully vaccinated at all times and any greyhounds without the appropriate certification should not be permitted to race.**

9. Governance and Management of Welfare

9.1 INTRODUCTION

This section will review:

- The current structure of welfare governance;
- NZGRA's welfare strategy and activities.

9.2 SUMMARY OF MAIN FINDINGS

- A number of welfare actions have been initiated by NZGRA. However, the NZGRA Board has not been as pro-active as it should have been with regard to welfare issues.
- Welfare initiatives and reviews to respond to the significant issue of population management have been in place for several years in other jurisdictions but have not, as yet, been considered in New Zealand.
- Lack of monitoring and enforcement of rules has led some participants to feel no obligation to comply with welfare-related rules and standards.
- There is a need for more focus, resource and funding to be provided by the NZGRA Board in order to achieve its Animal Welfare Policy Strategy.

9.3 DETAILED RESULTS AND FINDINGS

9.3.1 THE CURRENT STRUCTURE OF WELFARE GOVERNANCE

The NZGRA Board formed an Animal Welfare Committee in 2012. Two Board members sit on this committee and the NZGRA Vet and NZGRA Training and Development Manager report to the Board. The committee meets on a quarterly basis and has met twice since its inception. The committee has been charged with ensuring that all greyhounds in New Zealand are protected and promoted by the adoption and development of sound animal welfare standards and practices.

The establishment of this committee is a key development for the governance of welfare. However, it is noted that there are no independent members on this committee with a detailed knowledge of animal welfare matters. It is also noted that the current Chairman of the Welfare Committee is a Trainer Representative on the NZGRA Board who is a current licensed public trainer. It is appropriate to have a trainer representative on the Welfare Committee to provide knowledge and practical considerations. However, having a trainer representative as the chairman of the committee creates a potential conflict of interest.

The The Institute of Directors in New Zealand (Inc) (IOD)'s Principles of Best Practice for New Zealand Directors describe a typical example of a conflict of interest to include, "transactions...in which directors have a direct or indirect material interest" and states, "Even the appearance of conflict is to be avoided."¹²

¹² The Institute of Directors in New Zealand (Inc) (IOD)'s Principles of Best Practice for New Zealand Directors p.35

9.3.2 NZGRA'S WELFARE STRATEGY AND ACTIVITIES

A number of welfare actions have been initiated by NZGRA. NZGRA has provided details of the budget for these activities in 2012/13 as detailed below:

Welfare Activities 2012/13 Budget	\$
GAP Funding	189,430
Establishing Greyhound Welfare Committee Review	160,000
Dog Welfare*	50,000
Track Inspection & Review Costs	50,000
Veterinarian Conference	10,000
National Track Curators Conference	9,000
Dog Vet Expense (Disease Testing)	1,200
Total	469,630

Table 21*

The 'Dog Welfare' budget comprises of costs of recovering 'at risk' greyhounds, veterinarian cost for recovered greyhounds, kennelling costs, etc. YTD April spend at April 2013 amounts to \$14,518. 'Dog Welfare' spend in 2011/12 was \$18,803.

However, the NZGRA Board has not been as pro-active as it should have been with regard to welfare issues. An example of this is the significant issue of population management where welfare initiatives and reviews in other jurisdictions have been in place for several years but have not, as yet, been considered in New Zealand.

Monitoring and enforcement of rules has also been lacking which has led to non-compliance with welfare-related rules and standards as noted with the lack of adherence to the rules regarding deregistration of greyhounds.

There is currently no mechanism in place for NZGRA to report on the performance of welfare initiatives it has in place and there is a lack of clear financial analysis on welfare spend across the industry. Non-standardised reporting by the greyhound racing clubs and NZGRA makes it very difficult to identify how much is spent in total by the industry on welfare.

Furthermore, there is currently no designated Welfare Officer in place at NZGRA and it is noted that welfare activities undertaken by NZGRA are performed by several management and staff members on top of their standard workloads. It was noticeable that each of the other jurisdictions we corresponded with have a full-time professional welfare officer on their staff.

NZGRA's Strategic Plan for 2012-2017 states that its strategic priorities include world class animal welfare. However, the view of the review team is that NZGRA has concentrated on racing, with welfare not being given this level of priority.

NZGRA's Animal Welfare Policy states that it has the responsibility and authority to regulate animal welfare within the New Zealand racing industry.

Additionally, the strategy defined in NZGRA's Animal Welfare Policy states:

STRATEGY

A true national approach will ensure commitment from all stakeholders towards high standards of animal welfare based on concise processes which include:

- 1 *Ensuring that all administrative legislative and planning mechanisms support effective management of animal welfare in New Zealand by:*
 - *Establishing a shared understanding of respective roles and responsibilities across all states and territories within Australasia.*
 - *Facilitate the maintenance of effective animal welfare programs in New Zealand.*
 - *Promote the adoption of a harmonised approach to the development and application of clear, contemporary, adequate and consistent animal welfare legislation and codes of practice.*
 - *To involve all stakeholders in ownership of the animal welfare policy, by encouraging the use of effective consultative and communication mechanisms to engage all.*
- 2 *Achieve sustainable improvements in animal welfare based on national standards by:*
 - *Strengthening the framework for enhancing the delivery of acceptable animal welfare outcomes. For instance it will assist with the development, collection and collation of national statistics on animal welfare standards.*
 - *Promote the development and use of humane and effective methods of welfare.*
 - *Expand New Zealand's efforts to inform international bodies of our current standards by establishing closer working relationships.*
 - *Contribute to the development of international welfare standards.*
 - *Identify possible research and development needs.*
- 3 *Achieve effective communication, education and training across the entire industry by:*
 - *Enhancing the attitudes, skills and knowledge of animal carers and handlers and all other people whose actions have a potential effect/impact on the greyhound racing industry by developing national standards which promote consultation and the dissemination of information on animal care and encourage the adoption of best practice standards.*
 - *Develop and promote educational programs for the improvement of skills of people.*
 - *Publicise the existence and content of existing animal welfare legislation.*
 - *Other supporting literature in relation to National Animal Welfare is the NZGRA Rules of Racing.*

In order to achieve this strategy, there is a need for increased focus, resource and funding to be provided by the NZGRA Board as highlighted by the findings of this report.

Initiatives and recommendations to improve both the governance and management of welfare and welfare activities will be considered in the next section.

10. Initiatives to Improve Governance and Management of Welfare

10.1 INTRODUCTION

This section will review and establish initiatives and recommendations to resolve issues relating to welfare governance and management though:

- Improving the structure of welfare governance;
- Improving the management of welfare strategies and activities.

10.2 IMPROVING THE STRUCTURE OF WELFARE GOVERNANCE

As noted above, the establishment of this committee is a key development for the governance of welfare. However, there is a need to ensure that this committee has sufficient knowledge of animal welfare matters and developments in order to be as effective as possible.

- **It is recommended that the NZGRA adds to the membership of its Welfare Committee with the appointment of independent committee members with detailed levels of knowledge and understanding of animal welfare matters.**

In May 2013, the New Zealand Government issued an Animal Welfare Strategy which states that¹³ “Using animals is acceptable as long as it is humane.” It continues with the statements, “Ideas of humane treatment evolve over time, and our standards of welfare need to keep pace with changes in scientific knowledge and good practice, available technology, and our society.”

NZGRA’s animal welfare strategies need to evolve in line with society’s changing views on welfare.

In order to ensure this, it is recommended that NZGRA’s Welfare Committee should incorporate the following activities:

- **NZGRA should enter into a formal agreement and liaison process with the RNZSPCA and NAWAC in order to agree approaches to handling welfare issues and concerns and to provide an information flow on developments and changing social expectations regarding welfare and humane treatment.**
- **The Welfare Committee should communicate on a regular basis with other greyhound racing jurisdictions and GAP to coordinate regular information exchanges relating to welfare concerns, issues and research into welfare initiatives and medical research performed in other jurisdictions. Such information could provide invaluable sources of information that could be readily available to NZGRA to assist in allowing NZGRA to station itself at the forefront of welfare thinking and scientific research into welfare.**
- **Formal reporting of risks and issues raised in the annual NZGRA sponsored veterinarian and track curator conferences should be made to the Welfare Committee and a formal response and**

¹³ Ministry for Primary Industries - Animal welfare matters New Zealand Animal Welfare Strategy p.4

action process should be implemented to control the risks and issues raised.

- **Formal relationships with the Sports Turf Institute and Massey University should be maintained to ensure NZGRA keeps up-to-date with changes in scientific knowledge and technology available with regard to track safety and greyhound health.**

10.3 IMPROVING THE MANAGEMENT OF WELFARE STRATEGIES AND ACTIVITIES

As this report notes, there is a clear need for change in the greyhound racing industry in terms of rules and regulations, education and awareness, and in attitudes towards welfare. The NZGRA Board as custodian of the sport needs to be the driver of this change. The NZGRA Board needs to take more oversight of the industry and ensure that its rules are being enforced and compliance is being monitored.

Governance arrangements need to facilitate the effective and efficient regulation and governance of greyhound racing. Current governance arrangements whereby the Greyhound Racing Clubs must approve all rule changes means it can become difficult for the Board to implement rule changes relating to welfare. The changing of NZGRA rules have to be passed at the annual AGM unless a Special General Meeting is called. Again this process can slow the process of implementing rule changes.

At times there appears to be a conflict between the NZGRA Board and its clubs and members regarding welfare. It is noted in section 3.4.8 that NZGRA's attempts to align its rule on euthanasia with that of Greyhounds Australasia have twice been rejected by the clubs. Additionally, the Greyhounds Australasia rule on greyhounds not being allowed to race until 16 months of age was reduced to 14 months by NZGRA due to pressure from the clubs.

If the situation arises where conflict between the NZGRA Board and its clubs is seen as an insurmountable impediment to changing welfare rules, the NZGRA Board should consider amending its constitution to empower the Board itself to make rule changes.

The NZGRA has also set itself a comprehensive animal welfare strategy. However, In order to achieve this strategy, there is a need for increased focus, resource and funding to be provided by the NZGRA Board.

Specifically, it is recommended that:

- **The NZGRA Board should set short, mid and long-term targets for achieving its Animal Welfare Policy Strategy and report on progress both internally and in its annual report. Such targets should be specific and measurable. Examples of areas that could be targeted include:**
 - Reducing the number of greyhounds bred in New Zealand;
 - Reducing the numbers of greyhounds not making it to the track;
 - Reducing injury numbers;
 - Making safety improvements to tracks;
 - Increasing the duration of the average racing life of a greyhound;
 - Increasing the numbers of greyhounds rehomed after their careers.
- **NZGRA should also ensure that appropriate funding is made available to ensure that this strategy can be implemented. Detailed financial analysis of welfare spend both by NZGRA and its clubs should be collated and reported to provide evidence of the commitments made by the industry.**

Considering the additional ongoing welfare activities that will be required by the recommendations of this report, NZGRA needs to consider how these activities will be resourced. The opinion of the review team is that the likely workload and skillset required to perform these activities will necessitate the employment of a full time professional welfare officer. The position of welfare officer will need to be a suitably senior role and will include the performance of following tasks:

- Liaising with external welfare bodies such as RNZSPCA, NAWAC, other greyhound racing jurisdictions to develop ongoing welfare strategies and activities;
- Developing welfare related education programs with the NZGRA Training and Development Manager;
- Monitoring of injury statistics and reports to highlight and act upon welfare issues identified.
- Enforcing and monitoring compliance with NZGRA rules on deregistration.
- Managing the service agreement with the RIU and liaising with the RIU to identify and target welfare concerns.
- Negotiation with existing and potential rehoming agencies and bodies to develop further opportunities.
- Developing reporting metrics for reporting to the NZGRA Board and Welfare Committee.

It is recommended that:

- **NZGRA should employ a full time professional welfare officer with the appropriate levels of skill and provide the appropriate levels of resource to oversee and undertake the welfare initiatives required.**

11. Appendices



APPENDIX 1 – BASIS AND USE OF REPORT

This report is prepared on the basis of the limitations set out below:

We are engaged by the General Manager of the New Zealand Greyhound Racing Association to provide an independent report based on the terms of reference detailed in section 2.2.

This report has been prepared in accordance with the objectives and approach agreed in the engagement document and subject to the following limitations:

- The matters raised in this report are only those which came to our attention during the course of performing our review and are not necessarily a comprehensive statement of all the issues that exist or improvements that might be made. We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate processes over all levels of operations and their responsibility to prevent and detect irregularities. Accordingly, management should not rely on our report to identify all issues that may exist in the systems and procedures under examination, or potential instances of non-compliance that may exist.
- Recommendations for improvement should be assessed by management for their full commercial impact, before they are implemented.

This Report is not to be used by any other party for any purpose nor should any other party seek to rely on the opinions, advice or any information contained within this Report. In this regard, we recommend that parties seek their own independent advice. WHK disclaims all liability to any party other than the client for which it was prepared in respect of or in consequence of anything done, or omitted to be done, by any party in reliance, whether whole or partial, upon any information contained in this Report. Any party, other than the client for which it was prepared, who chooses to rely in any way on the contents of this Report, does it so at their own risk.

The information in this Report and in any related oral presentation made by WHK is confidential between WHK and the client for which it was prepared and should not be disclosed, used or duplicated in whole or in part for any purpose except with the prior written consent of WHK.

APPENDIX 2 – PERSONS INTERVIEWED OR WHO SUBMITTED WRITTEN AND/OR ORAL EVIDENCE

INDUSTRY ADMINISTRATORS

- NZGRA Board members
- NZGRA staff
- Representatives from 6 NZ Greyhound Racing Clubs
- RIU General Manager
- RIU Joint Chief Stipendiary Steward
- 4 RIU Stipendiary Stewards

VETERINARY REPRESENTATIVES

- NZGRA Vet
- 2 NZ Greyhound Racing Club vets
- Massey University Professor of Veterinary Science

ANIMAL WELFARE REPRESENTATIVES

- NZRSPCA Officials
- Greyhounds as Pets (GAP) Chairman
- GAP Program Director
- GAP Kennel Managers
- Greyhound Protection League Spokesperson

REPRESENTATIVES FROM OTHER JURISDICTIONS AND RACING CODES

- New Zealand Racing Board Head of Industry Liaison
- CEO of Greyhounds Australasia
- Greyhounds Victoria Animal Welfare Manager
- Greyhounds NSW Welfare Officer
- British Greyhound Racing Board Welfare Officer
- Officials from the NZ Thoroughbred Racing Code
- Official from the NZ Harness Racing Code
- Selwyn District Council Senior Animal Control Officer

OTHER CORRESPONDENCE

Additionally correspondence was entered into with the Racing and Wagering Western Australia Racing Veterinarian and correspondence on best practices in dog welfare was entered into with the National Training & Standards Manager, Explosive Detector Dog Unit, New Zealand Aviation Security service.

APPENDIX 3 – POLICIES AND PROCEDURES REVIEWED

- Rules and Constitution of New Zealand Greyhound Racing Association (Incorporated)
- Animal Welfare Policy for Industry Participants of the New Zealand Greyhound Racing Association (Inc.)
- NZGRA Greyhound Industry Operational Guidelines
- NZ Animal Welfare Act 1999
- NZ Animal Welfare (Dogs) Code of Welfare 2010
- NZ Dog Control Act 1996
- Ministry for Primary Industries Animal welfare matters New Zealand Animal Welfare Strategy
- Greyhounds Australasia Rules
- Greyhound Racing Victoria Local Racing Rules
- Greyhound Racing Victoria Code of Practice for the Greyhound Industry
- Greyhound Racing Victoria Breeder's Education Package
- Greyhound Racing Victoria Transportation of Greyhounds Policy
- Greyhound Racing Victoria Grading Guidelines
- Greyhounds NSW – Greyhound Racing Rules
- Greyhounds NSW Code of Practice for the Keeping of Greyhounds in Training
- Tasracing Tasmanian Greyhound Local Rules of Racing
- Tasracing Greyhound Policy Manual
- Tasracing Greyhound Animal Welfare Manual
- Tasracing Management & Care for each stage in the lifecycle of a Greyhound
- Tasracing Recommended Standards for the Care of Greyhounds
- Tasracing Information for Anyone Interested in Breeding a Litter of Greyhounds
- Greyhound Board of Great Britain – Caring for Our Greyhounds
- Greyhound Board of Great Britain – Rules of Racing
- UK Breeding and Sale of Dogs (Welfare) Act 1999
- Republic of Ireland Greyhound Industry (Racing) Regulations
- Republic of Ireland Greyhound Welfare Code of Practice
- Republic of Ireland Welfare of Greyhounds Act 2011
- AsureQuality Pet Boarding Establishments Code of Practice for Boarding Kennels

APPENDIX 4 – ABBREVIATIONS USED

The following abbreviations throughout this report:

GAP	–	Greyhounds as Pets
GBGB	–	Greyhound Board of Great Britain
IOD	–	The Institute of Directors in New Zealand (Inc)
MPI	–	Ministry for Primary Industries
NAWAC	–	National Animal Welfare Advisory Committee
NZGRA	–	New Zealand Greyhound Racing Association
NZRB	–	New Zealand Racing Board
NZRLS	–	New Zealand Racing Laboratory Services Ltd
RIU	–	The New Zealand Racing Integrity Unit Ltd
RNZSPCA	–	Royal New Zealand Society for the Prevention of Cruelty to Animals