

**Submission:**

**Draft Code of Practice for the Keeping of Racing Greyhounds Public Comment**

DATE:

NAME: [INSERT NAME]

ADDRESS: [INSERT ADDRESS]

EMAIL: [INSERT EMAIL]

I [do / do not] consent to my submission being available as a public document.

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### **INTRODUCTION:**

My name is [insert].

I am a [owner/trainer/breeder/rearer] - [if other: describe your involvement: eg: own a commercial rearing business].

I have been a registered participant with GRV or otherwise involved in the industry for [number] years.

I have a property at [location] in Victoria. I [own/train breed/rear] about [number] greyhounds.

I participate in greyhound racing as a [hobby/business]. [I spend approximately \$[amount] per year on my involvement in the industry.]

I have read the draft Code of Practice published by the Department of Economic Development, Jobs, Transport and Resource at <http://agriculture.vic.gov.au/pets/dogs/greyhounds/code-of-practice> (Draft Code). [I have also read the executive summary of the Regulatory Impact Statement (RIS).]

### **SUMMARY:**

The Draft Code will make me re-consider whether I want to continue participating in the Victorian greyhound industry.

It is an overbearing, ill-advised code that will cost enormous amounts, not improve welfare outcomes and decimate hobby participation in an industry where hobby participation is incredibly important to meeting racing and other requirements keeping the sport viable.

My particular concerns with the Draft Code are in the areas of [PICK ONE OR MORE, ADD AS NECESSARY]:

1. Staffing my property and the cost and burden of doing it.
2. Administration burden – establishment health plans and monitoring on top of existing record keeping requirements under the rules of racing places all of the burden of a full-time business on participants no matter the level of their participation;
3. Husbandry – ‘what to do’ food, water, exercise, socialisation and enrichment obligations that are not right for greyhounds either as a breed or given what greyhounds are reared and trained to do, and may be harmful to greyhounds in several places.
4. Facilities – the Draft Code would mean I need to [change / build] facilities on my property at a cost of up to \$[x], immediately without regard to the useful life of my current facilities. [This is despite me having no issues with the welfare of my greyhounds previously when inspected.]
5. Effect on hobby participants.
6. Effect on regional areas and ability of regional participants to comply with the Draft Code.

7. Additional regulation – participants already need to follow detailed rules and policies of racing, many of which are actually tailored for greyhounds or greyhound racing. Greyhound establishments face regular inspection, as do greyhounds. Welfare risks are best addressed by those inspections which ask the basic question: is the greyhound healthy? – rather than is a fence a certain height or is a yard a certain size or shape.

8. Most of the measures said by the Draft Code to be relevant to re-homing as pets are things that no-one would dream of imposing on an average pet owner – let alone with the prospect of a \$38,000 fine and a conviction for breach of the Draft Code.

9. To make my property Draft Code compliant alone would cost me about \$[x]. It will make no difference to the general welfare or re-homing potential of my greyhounds. [I re-home greyhounds successfully now.] [I have not had welfare issues in the past.]

10. To comply with the exercise, socialisation and other day to day requirements (if they could be complied with) would cost me an extra \$[x] per week [because I would have to employ someone to do them / because I would have to place my greyhounds elsewhere / because that's what my [rearer, trainer] has said would be charged].

11. I estimate that the cost to me of rearing, educating and training a single greyhound from 3 months of age to its first race start at 18-20 months of age would increase by \$[x].

12. A better solution would be a form of document that sets goals and minimum outcomes, without telling participants what to do, backed by continued inspection of greyhounds under the rules of greyhound racing.

## SECTIONS OF THE DRAFT CODE

### Staffing – section 3

[Things you may wish to comment on – what staffing may cost you if you have more than 25 greyhounds; why any staffing ratio needs staff to be employed rather than simply competent persons present; lack of clarity around whether there is a need for people on call or at the property at all times (at whatever level of involvement); why does the code need to speak to vehicle or transport requirements when there are GRV rules and policies]

### Establishment operation – section 4

[Things you may wish to comment on – whether you could prepare a health management plan for your property for sign-off by a vet; availability of greyhound vets in your area to assist you in preparation or administration of the facility plan; whether the contents of plans and requirements are of any assistance to the welfare of the greyhound as it is reared, educated, trained; whether any transport section is needed due to existence of GRV policies; ability to keep greyhounds ‘safe from attack, stress or injury from other greyhounds, animals or people’.]

### Records – section 5

[Things you may wish to comment on – need for establishment records at all given records kept under GRV Rules, scope of what must be kept (necessity) and why for as long as is said to be necessary; duplication of GRV records and use of FastTrack; security risk of having full dog identifying details on kennels.]

### Husbandry – Management of Greyhounds – section 6

[Things you may wish to comment on – particular requirements for ‘nutrition’ (number/time of feeds etc); vaccination timing and vet health check timing and need given when greyhounds receive vet checks anyway; muzzling – why wire cage muzzling in housing can be proper animal husbandry;

Breeding - whether ‘heritable defect’ concept (particularly extending to physical defects) and definition works in greyhound breeding; why breeding can be stopped based upon a single notification of a ‘heritable defect’ ;

Rearing - why ‘rearing’ requirements are unnecessary or inappropriate (especially saying that certain activities ‘must’ be done); why ‘pre-training’ requirements are unnecessary or inappropriate (especially saying that certain activities ‘must’ be done); why ‘training’ requirements are unnecessary or inappropriate (especially saying that certain activities ‘must’ be done);

Preparing a greyhound for rehoming (6.3.12) – whether you think these requirements can be achieved at most properties including your own, whether they are necessary by reference to your own re-homing practices already. Cost. Ability to comply.

Exercise - Table 1 – appropriateness (including why), cost to you, usefulness, whether could be expressed differently,

Socialisation – Table 2 - appropriateness (including why), cost to you, usefulness, whether could be expressed differently,

Facilities – cost of requirements to you. Need for those things. Whether certain facility (eg: toileting yards) or kennel sizes or construction types are or are not appropriate and why.

Minimum housing requirements (Table 3) – need for any unintended consequences of having those sizes and exercise conditions.]

Transfer and sale of greyhounds – section 7

[Things you may wish to comment on – duplication of giving health and management statement and GRV record book for sale or transfer within industry; need to de-sex greyhound transferred out of the industry; ability to notify GRV of new (non-industry) owner address (privacy); why have a 21 day return policy for greyhound transferred out of industry if disclosure documents.]

Hobby establishments – section 8

[Things you may wish to comment on – how the greyhound industry has a different idea of what a hobbyist is (ie can be someone with more than 2 dogs who sleep in the house), effect on the true hobby participant of having to comply with Draft Code and lack of welfare effect on greyhound.]

Hobby participants are the lifeblood of greyhound racing.

A hobby greyhound participant is not one with 2 or less greyhounds. A hobby owner or trainer may own/breed/train a litter of his/her own which may be more than 2. In any event, almost all hobbyists will have dedicated kennels, pens and yards for racing greyhounds in any event – the exemption is an illusion.

A hobby establishment is one where the keeping of greyhounds is not the main or a significant source of income of the person in charge of it. That person is usually employed elsewhere.

Merely excusing a hobby participant (even on the Draft Code's definition of hobby establishment) from building the facilities, but imposing all other requirements of the Draft Code, will cause the hobbyist to bear most of the cost, and more importantly, all of the same compliance burden and risk applying to non-hobbyists.

For hobbyists, the Draft Code is a significant risk to participation in the sport of greyhound racing.

CONCLUSION:  
[EXAMPLE BELOW]

Industry participants are subject to detailed rules and regulations under the rules and policies of greyhound racing. They are usually tailored to greyhound needs. These are heavily policed. Regulator or vet inspections – property and individual greyhound – are common to ensure animal welfare.

Within those boundaries, there needs to be flexibility to take care of greyhounds to maximise their performance, without being told – under threat of conviction and heavy fine – how to do this. This is especially so when the ‘how’ is so often wrong or inappropriate as it is in the Draft Code.

This is not a sensible Draft Code. It is overlapping, ill-fitted, ‘what to do’ regulation that would impose enormous burden for little or no real benefit. It needs to be completely redone.