

National Greyhound Welfare Strategy

Industry Notification and Feedback – Breeding & Vaccination Requirements

Background

The Greyhound racing industry in Australia is aware that the welfare of its racing animals is extremely important and is working towards a more consistent national approach to welfare issues. Uniform high standards of care, education, accountability and enforcement are required across the country to ensure the best possible outcome for greyhounds at every stage of their lifecycle.

Industry success is tightly paired to excellence in animal welfare. The industry is open to ongoing scrutiny from the general public, whose expectations about how we look after our racing animals continues to evolve. Our industry must continue to change to meet those expectations and the high expectations we have of ourselves.

Greyhounds Australasia (GA), along with the state controlling bodies, recognise that the time has come for all state jurisdictions to align their strategies so our standards of care and the welfare of every greyhound continues to improve and is not impacted by the movement of greyhounds from state to state.

The industry's National Greyhound Welfare Strategy was approved by the GA Board in May 2014. Amongst its objectives are better protection of the welfare of our industry's breeding animals, and reducing the number of greyhounds bred that are unlikely to be suited to racing.

New rules to support the achievement of these objectives have been drafted and are proposed to come into effect on 1 July 2015. GA is now seeking participant feedback on the new rules to guide the industry's approach to these important matters and to ensure responsible and considered implementation of each new rule.

Between 1 December 2014 and 15 January 2015, all participants, but particularly those involved in breeding greyhounds, are invited to complete this attached feedback form in time for your opinions and suggestions to be considered by GA's Welfare Working Party and the GA Board in early 2015.

GA and its controlling bodies thank you for taking the time to tell us what you think. We look forward to working together as we continue to improve the welfare of all greyhounds.

All completed feedback forms must be received by Greyhounds Australasia by the close of business on Thursday 15 January 2015

You can submit your form in a number of ways:

- Via email - feedback@galtd.org.au
- Via Fax - +61 3 9548 3488
- Via Post - PO Box 239, Springvale, Vic, 3171

In person – Greyhounds Australasia Office, Sandown Greyhound Racing Complex, Lightwood Road, Springvale, Victoria.

National Greyhound Welfare Strategy

Participant Feedback Form – Breeding & Vaccination Changes

PART A – INDUSTRY INVOLVEMENT

1. Which racing jurisdiction do you reside in?

ACT

NSW

QLD

SA

VIC

WA

NT

NZ

TAS

2. Which of the following industry roles are you involved in? (Please tick all that apply)

The NSW GBOTA is an organisation which (a) manages racing at nine racetracks in NSW including provision of the metropolitan, TAB and non TAB racing.

3. Have you been recorded as the BREEDER of a litter of racing greyhounds in the last five (5) years?

The NSW GBOTA has a membership of 1300 members, many of which are breeders.

4. In the last five (5) years how many litters of racing greyhounds have you bred?

Not applicable.

5. In the last five (5) years how many litters of racing greyhounds have you whelped and raised yourself?

Not applicable.

6. Are you a member of your state's participant representative organisation – i.e. GOTBA (VIC), GBOTA (NSW)?

Submission is submitted by the NSW GBOTA.

National Greyhound Welfare Strategy

Participant Feedback Form – Breeding & Vaccination Changes

PART B – PROPOSED RULE CHANGES - BREEDING

1. Amendment to the Registration requirements for Breeding Females (Brood Bitches)

GAR 127 – Registration of sire and breeding female (brood bitch)

(6) A greyhound shall not be used as a brood bitch unless registered as a ‘breeding female’.

(7) All documents and other items in relation to a breeding female shall be open for inspection by an officer of the Controlling Body.

(8) Application for registration as a breeding female may be made by the owner or authorised person by lodging with the Controlling Body –

a) a completed prescribed form with any fee that may apply; and

b) at the expense of the applicant a DNA fingerprint analysis carried out by a laboratory designated by Greyhounds Australasia on a sample taken by a veterinary surgeon or other approved person, and

c) evidence of a current vaccination status against parvovirus, hepatitis, canine distemper, parainfluenza virus and bordatella bronchiseptica (C5) issued by a veterinary surgeon identifying the greyhound by reference to its sex, ear branding and/or microchip identifications.

(9) The granting of registration of a breeding female shall be conditional on the greyhound being in the control of the applicant or other approved person.

What will this proposed rule change?

Previously, there was no formal registration process or separate ‘status’ for breeding females

DNA profile will now be required before service can take place. Currently it is a requirement before a litter can be registered, meaning many breeders put off testing until pregnancy is confirmed, or until pups are whelped

New vaccination requirement to level of C5

Why is this change being proposed?

To ensure breeders are committed to breeding with a bitch, and have thought ahead, rather than making hasty decisions when their bitch comes into season.

To ensure DNA parentage confirmation is conducted PRIOR to the bitch being bred – protecting the investment of the breeder, and any potential purchasers.

To provide an opportunity for new breeders to be educated about breeding, sire selection, whelping and raising a litter PRIOR to any service taking place.

- To increase the level of protection against disease for the individual breeding female.

National Greyhound Welfare Strategy

- To increase the level of maternal antibody passed onto puppies by ensuring all breeding females have good immunity prior to service. This, in turn, helps prevent disease and possible death of puppies due to preventable diseases, minimising losses.
- To ensure that a breeding female's vaccination status meets the requirements for boarding under relevant (state based) Codes of Practice, particularly for those females that are not housed at the owner's property.

In relation to the amendment to the registration requirements for Breeding Females (Brood Bitches):

1a) Since 2011, Stud Sire registration has been controlled nationally and incurs a once-off registration fee. What do you think is an appropriate fee structure for registration of breeding females?

- A ONCE OFF FEE
- A YEARLY REGISTRATION FEE
- A BREEDING 'BOND' (charged per litter or per pup, and partially or fully refunded once pups from the litter reach the track and race)

The NSW GBOTA does not support a registration fee at all. Costs incurred by breeders are already considerable. Given the costs associated with caring for a brood bitch (especially on a whole of life assessment) against, in most cases, a limited return from progeny sales, the NSW GBOTA believes it unreasonable to impose a further cost on breeders. The NSW GBOTA does not believe breeding females can be considered in the same light as Stud Sires where the commercial dynamics vary considerably. The NSW GBOTA believes the cost of Breeding Female registration should be absorbed by Greyhounds Australasia or the controlling jurisdictions.

1b) Do you think there should be any additional conditions for registration as a Breeding Female – either for the BREEDER/OWNER or for the GREYHOUND?

The NSW GBOTA does not support additional conditions for registration, outside of those outlined in the proposed GAR 127 (6) to (9). GA has not produced any significant data to suggest failure rates for Breeding Females of certain credentials. Based on its own anecdotal evaluation of the industry, it seems that that Breeding Females with a variety of credentials have proven successful. Very few, if any breeders, conduct breeding only operations on a commercial basis; breeding is either part of a wider greyhound industry involvement or an activity aimed at generating a longer term investment via retaining ownership of some or all of the breeding progeny with a view to earning racetrack prizemoney. Given the low commercial return (at the 3 month of age general pup sale price) vs the considerable risk in terms of success, considerable free market pressure already exists on breeders to make calculated and considered decisions. GA should not seek to arbitrarily interfere in this regard, particularly without advanced statistical data to support conditions on and above those proposed.

1c) Please provide any other comments relating to the registration requirements for a breeding female:

Previous answer sufficient.

National Greyhound Welfare Strategy

2. Introduction of an upper age limit for Breeding Females (Brood Bitches)

GAR 127

(10) The owner of a breeding female, or the person with authority to breed that female, shall not cause her to be mated if that breeding female is over the age of eight (8) years of age without prior veterinary certification of appropriate health and fitness, and the approval of the Controlling Body in writing.

What will this proposed rule change?

- Previously there have been no age limits for breeding – breeders could breed any female greyhound provided she had reached the required age for naming.
- The new rule will see a requirement for the breeder to have the greyhound examined by a veterinarian to ensure that she is fit to have another litter, PRIOR to her being served
- The veterinary certificate stating the greyhound's fitness for breeding will need to be provided to the Controlling Body before approval for the service will be given

Why is this being proposed?

- To protect the welfare of the breeding female by ensuring that as she gets older, her health and fitness will not be adversely affected by being bred with.
- To protect the welfare of the breeding female by ensuring that she is fit for an anaesthetic if surgical implantation of frozen semen is being considered.
- To ensure that any litter of pups resulting from a service have the best chances of receiving adequate nutrition for the critical stages of growth and development during pregnancy and suckling, therefore maximising their chances of success later in life.
- To bring the industry into line with other Breeding 'Codes of Practice' and 'Codes of Ethics'.

How many older bitches are bred?

Industry statistics show that most litters are whelped when the bitch is in the age range of 2-6 years and that very few bitches whelp litters after the age of seven years (see graph on next page).

We do, however, see some breeders continue to breed from a bitch into 'old age', with varying success.

In relation to the introduction of an upper age limit for Breeding Females (Brood Bitches):

2a) What are your views on an age limit being imposed on Breeding Females? Do you think a veterinary certificate is enough to allow a breeding female to exceed an upper age limit or should there be other conditions?

The NSW GBOTA does not believe that an upper age limit needs to be imposed on Breeding Females, particularly without the provision of (a) evidence to suggest that bitches of this age have currently been put at risk and/or (b) data that suggests there is a connection between breeding with a greyhound of a certain age and say, poorer results in terms of percentages of pups bred that go on to race. The limited data released in this discussion paper by GA suggests that a low number of greyhounds are used for breeding after three litters. Data produced by Dr. Nathan Absalom (NSW GBOTA member) which has been provided to GA, suggests that the success of bitches who are bred with for the fourth time compares favourably with the general average of all breeding activity. This again suggests that breeders, operating in a free market, are making their own calculated, considered and seemingly effective decisions. If GA does proceed with the a breeding limit being applied at eight years of age, the sole condition that should be required is a veterinary certificate to verify that the Breeding Female is fit to carry and whelp a litter. Again, The NSW GBOTA would suggest that GA should not be seeking to interfere, particularly without a researched case to support it doing so, with a free market which appears to be self-regulating effectively.

2b) Please provide any other comments relating to the introduction of an upper age limit for Breeding Females:

Addressed above.

3. Introduction of a cap to the number of litters from an individual Breeding Female (Brood Bitch)

GAR 127

(11) A breeding female cannot be used for breeding more than three (3) litters without prior veterinary certification of appropriate health and fitness for further litters, and the approval of the National Breeding Review panel in writing.

What will this proposed rule change?

- Previously there have been no limitations to the number of litters a single bitch could whelp.
- This rule would allow breeders to have up to three litters from a single bitch without any restrictions. In most cases, this would provide the breeder with a very good idea of what she is able to produce.
- If a breeder would like to go on to breed a fourth, fifth or even sixth litter from the bitch, they would need to apply each time to a National Review panel, stating their reasons for wanting to continue to breed from her.
- The breeder would also need to have the bitch examined by a Veterinary Surgeon to ensure that she was fit to have another litter.

Why is this being proposed?

- Statistics compiled by the Victorian Responsible Breeding Taskforce in 2007 indicated a brood bitch that had not produced successful offspring in her first three litters was highly unlikely to produce successful offspring in subsequent litters, regardless of the sire used.
- The industry is committed to reducing the number of pups born that have very limited chances of ever racing.
- To prevent the ongoing breeding of brood bitches that have not produced successful offspring in their first three litters (unless there are extenuating circumstances that have affected the pup's chances of success).
- A National Breeding Review Panel, responsible for deciding whether a brood bitch who has had three litters is allowed to be mated with for a fourth or subsequent time, will allow for a more standardised and transparent approval process for all breeders, regardless of their state of residence.
- To ensure that breeders have reviewed their bitch's success as a producer of racing dogs prior to planning their next litter, and to ensure that they have thoroughly considered their future breeding plans to maximise their chances of success.
- To protect the welfare of the breeding female by ensuring that after whelping three litters, her health and fitness will not be adversely affected by being bred again.

How many bitches have four or more litters?

Industry statistics show that most bitches have one, two or three litters over their lifetime, only 13.5% of all bitches have a fourth litter and less than 6% of bitches have five or more litters (see graph below).

In relation to the Introduction of a cap to the number of litters from an individual Breeding Female (Brood Bitch):

3a) What factors/success criteria relating to previous litters would you consider important when considering granting an exemption for a bitch to be bred for the fourth (or subsequent) time?

For example: 'if she had whelped less than 6 live pups over the three litters'

or 'must have at least 50% of pups from the first two/three litters race'

The NSW GBOTA again reiterates that we believe the market currently self regulates effectively. The NSW GBOTA views GAR 127(11) as an unnecessary intrusion into a currently effective system. However, in noting that the driver for introduction of the rules is for the greyhound industry to have in place controls that ensure adherence to appropriate animal welfare behaviour, the NSW GBOTA would suggest that the proposed GAR 127 (11) be altered to read as follows;

GAR 127

(11) A breeding female cannot be used for breeding more than four (4) litters without prior veterinary certification of appropriate health and fitness for further litters, and the approval of the National Breeding Review panel in writing.

Again, reliant on the information provided by Dr. Nathan Absalom, the NSW GBOTA does not hold the view that there is any evidence of animal welfare issues arising from the use of a bitch for a fourth time. That is, the Breeding Female is not at risk nor does the success rate of the progeny appear to reduce to a level where resulting progeny appear to have any reduced likelihood of reaching the racetrack. If a National Breeding Panel is to have any role, it should only apply for litters beyond the fourth.

3b) A 'National Breeding Review Panel' is proposed to assess applications from breeders requesting to breed their bitch for a fourth or subsequent litter. Who do you think should be represented on, or make up this panel?

Subject to its response on 3 (a), the NSW GBOTA believes that the National Breeding Panel should comprise the following:

- Chairman of GA Animal Welfare Strategy
- CEO of GA Australia
- Nominee of the NSW GBOTA (as approved by GRNSW)
- Nominee of the Vic GBOTA (as approved by GRV)
- Two other persons, experienced in greyhound racing administration or in the veterinary profession, as determined by GA.

The Panel should be voluntary, save for reimbursement of reasonable expenses. It should be able to meet quickly and, given the likely geographic spread of members, be able to use electronic communication to make decisions quickly.

3c) Please provide any other comments relating to the introduction of a limit to the number of litters from an individual Breeding Female:

Subject to its response in 3 (a), the NSW GBOTA believes that it is important the National Breeding Panel is determines a criteria – based on research and statistical data – that would provide automatic approval criteria. This is to mean that a breeder using a Breeding Female for the fifth time, would be unimpeded to do so if he presented a case to National Breeding Panel that showed the bitch had met the criteria. The National Breeding Panel would not be free to arbitrarily reject a nomination. The National Breeding Panel's role should be restricted to considering applications where performance criteria had not been met and clearly explained extenuating circumstances applied.

As a guide to the primary driver to the proposed criteria, the NSW GBOTA would suggest the following:

That 40% of the progeny, over the age of 24 months and physically able to race, from previous litters have raced and that 20% have won.

4. Introduction of a limit to the frequency of litters for an individual Breeding Female (Brood Bitch)

GAR 127

(12) The owner of a breeding female, or the person with authority to breed that female, shall not cause her to whelp more than two (2) litters in any 18 month period.

What will this proposed rule change?

- Previously there have been no restrictions to the frequency that a bitch is mated
- This proposed rule will prevent a bitch from being mated at three successive seasons (if she is a '6 month' bitch)
- Bitches that cycle only once a year will not be affected by this rule

Why is this being proposed?

- Pregnancy and feeding a litter take its toll on a bitch, depleting vital nutrients from her body stores. Bitches need time to recover and replenish their body stores after a litter, and the time required for this will vary based on the size of her litter, whether she required a caesarean, and how good a mother she is.
- Litters at two consecutive seasons, particularly in young, healthy bitches, are usually not an issue but research has shown that the health and nutritional status of the bitch impacts the development of puppies. If the bitch's health and nutritional status is compromised it can affect litter size, birth weight and may have permanent or long lasting effects on the puppies.
- Where a bitch has her first three litters at consecutive six month seasons, it also means that she is bred for the third time BEFORE the pups from the first litter are old enough to be broken in, and their ability assessed.
- The industry is committed to reducing the number of pups born that have very limited chances of ever racing
- To bring the industry into line with other Breeding 'Codes of Practice' and 'Codes of Ethics'

In relation to the Introduction of a limit to the frequency of litters for an individual Breeding Female (Brood Bitch):

4a) Please provide any comments relating to the introduction of a limit to the frequency of litters for an individual Breeding Female:

The NSW GBOTA holds the view that the proposed scenario was unlikely to occur to any great degree. The NSW GBOTA would prefer a modification to the rule where-by if a breeder did intend causing his Breeding Female to whelp three litters within an 18 month period, that they be able to do so only if a veterinary surgeon provided a certificate that the Breeding Female was fit and able to be mated for the third litter.

PART C – PROPOSED RULE CHANGES – VACCINATION

GAR 115

(2) Application for registration/naming of a greyhound may be made by an owner by lodging with the Controlling Body in the state where the greyhound was whelped a completed prescribed form together with the prescribed fee and a certificate of vaccination against parvovirus infection, hepatitis, canine distemper, parainfluenza virus and bordatella bronchiseptica (C5) acceptable to the Controlling Body.

GAR 137

(1) (b) a certificate of vaccination against parvovirus, hepatitis, canine distemper (C3) issued by a veterinary surgeon identifying the greyhound by reference to its sex and colour, and where applicable, its earbranding and/or microchip identifications, that indicate that such vaccination was performed upon the greyhound at least between six (6) and eight (8) weeks.

GAR 137

(1) (c) a certificate of vaccination against parvovirus, hepatitis, canine distemper, parainfluenza virus and bordatella bronchiseptica (C5) issued by a veterinary surgeon identifying the greyhound by reference to its sex, colour, earbranding, and/or microchip identifications, that indicate that such vaccination was performed upon the greyhound between ten (10) and sixteen (16) weeks.

What will this proposed rule change?

- Increasing the level of vaccination required for naming from C3 to C5
- Increasing the level of vaccination required for litter registration from C3 to C5
- Adding a compulsory six-eight week vaccine for puppies with a minimum level of C3

Why is this being proposed?

- To increase the level of protection against disease for individual greyhounds, reducing the risk and severity of preventable diseases
- To increase the level of immunity across the racing greyhound population to further decrease the likelihood of disease outbreaks
- To minimise disease and possible death of puppies due to preventable diseases
- To ensure that a racing greyhound's vaccination status meets the requirements for boarding under relevant Codes of Practice, particularly for those greyhounds that are not housed at the owner's property
- To bring the industry into line with other Breeding 'Codes of Practice' and 'Codes of Ethics'

In relation to the Vaccine Requirement changes:

5a) Do you believe that the vaccination required for naming a greyhound should be given PRIOR to breaking in?

The NSW GBOTA is not aware of any evidence of non immunisation prior to breaking in being an issue. Given this, it does not support the suggestion but would be prepared to review its position in the event that evidence was provided that the suggestion would have meaningful impact on preventable disease issues.

5b) Should the mandatory vaccines include other diseases?

i.e. should the minimum be C7 instead of C5, or should that be decided in discussion with your veterinarian?

The NSW GBOTA believes that C5 is a more than adequate. Any decision to immunise above the minimum should be a matter for owners/trainers/breeders to determine in conjunction with their veterinarian.

5c) Please provide any other comments relating to the changes in vaccination requirements

Answer in 5 (b) sufficient.

PART D – ANY OTHER COMMENTS OR SUGGESTIONS

Please use the area below to provide any other comments or suggestions for the GA Welfare Working Party and the GA Board to consider as they implement the National Greyhound Welfare Strategy:

The NSW GBOTA would encourage GA to continue to consult with industry stakeholders on all animal welfare issues. Key issues of concern to the NSW GBOTA are as follows:

- National commitment to safe track standards
- National commitment to maximisation to racing opportunity to greyhounds, including older greyhounds.
- Re-badging nationally veteran racing as masters racing.
- Provision of animal welfare education via AGRA/GA Nationals conference.
- National branding of Greyhound re-homing schemes including co-ordinated, cost effective marketing and public education.