



**NSW Greyhound Breeders, Owners and
Trainers Association**

Response to:

GRNSW

**Development of a NSW greyhound racing
strategic approach**

Joint Working Group - Discussion paper

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To:	Greyhound Racing NSW (GRNSW)
From:	NSW Greyhound Breeders, Owners and Trainers Association
Contact:	Mr Brenton Scott Executive Officer NSW GBOTA PO Box 485 Glebe NSW 2037 Ph: 02 8587 1206 Email: brenton@gbota.com.au
Proposal:	Response to Joint Working Group discussion paper

The terms of reference have been provided by GRNSW. Stakeholder feedback has been sought on the following issues:

- over-production and unnecessary euthanasia
- governance
- tracks as centres of excellence
- grading systems
- wagering and financial landscape

Reducing over-production and unnecessary euthanasia

1. Should there be a limit on the number of dogs bred and should this be a quota system attached to a licensing system?

The NSW GBOTA supports a controlled approach to breeding levels. These controls must, however, not compromise quality.

In considering any restrictions on the total number that might be bred, the key issues that need to be understood from a NSW perspective are seemingly (a) the number of greyhounds required to meet racing obligations (which is in turn connected to the supply of racing in a commercially sustainable manner) and (b) the reliance of interstate racing on breeding supply from NSW.

The NSW GBOTA does not, at this point, support quotas. The NSW GBOTA believes that a combination of quality controls on breeding activities, education and market forces can combine to ensure greater correlation between supply (breeding numbers) and demand (race meeting model).

Given this, the NSW GBOTA supports:

- Breeder licencing, accreditation, training and education and standards.
- Data base mining (performance, racing resilience and traits) with a view to improving advice that can be provided to breeders.
- Reinforcement of the whole of life responsibility for owners (which, in itself, will moderate demand).

2. What actions can be taken to improve the racing opportunities open to less competitive dogs?

The grading policy, and possibly the benchmarking system upon which it is reliant, needs to be re-assessed. Currently, many greyhounds that are capable of undertaking the basics of chasing do not remain in the racing pool because they simply become non-competitive at a certain standard.

No matter the capability of a greyhound, if it is matched with other greyhounds of like capability, then a race that is competitive and able to be wagered on is created.

The benchmarking within the current grading policy needs to more effectively match greyhounds on like capability at various stages of their racing career. The NSW GBOTA was a driving force behind masters racing and believes there is still scope for further development of this racing type.

The Victorian concept of Tier 3 racing and lower grades seems to be creating a pool of greyhounds that are racing competitively. These same greyhounds may not have received such opportunity in past years.

The NSW GBOTA appreciates that in catering to the lowest common capability denominator, there will be a temptation to increase the footprint of short course

racing. However, the NSW GBOTA would be reluctant to support this without exploring other options on the basis that short course racing is not believed to be productive to the long term development of the breed and industry.

In addition, the NSW GBOTA believes that, no matter the level of racing, minimum prizemoney levels need to be in place and, further, that the minimum level should be no less than \$1000 to the winner.

The NSW GBOTA speaks further to this later in this submission, but would emphasise at this point that minimum prizemoney levels should not be introduced by compromising prizemoney levels for the higher levels of racing. Rather, the minimum levels should be achieved by limiting the overall level of racing activity.

The combination of (a) a higher minimum prizemoney base, (b) less racing but more opportunity within the racing mix and (c) breeding limitations in line with racing supply requirements are, in the view of the NSW GBOTA, fundamentally connected to an industry operating framework that is both ethical and sustainable.

3. What actions can be taken to extend the longevity of greyhound racing careers?

Aside from increasing opportunity for greyhounds at different stages of their career, the enforcement of an animal welfare focus from the whelping through to the end of the greyhound's racing career is essential.

The preparation for the rigours of racing commences from the point of whelping. Nutrition, socialisation, exercise and training all play a part in laying the foundations that enable greyhounds to compete. Given this, accreditation and standards are supported by the NSW GBOTA for breeders, rearers, educators and trainers.

The industry must also strive to provide a racing environment which is as safe as possible to greyhounds and minimises risk of injury. Primarily, this means safe tracks (design and racing surface), eradication where at all possible of turn starts for racing under 500m and considerations such as maiden greyhounds be restricted to six dog fields.

It also means provision of support services which aim to ensure the greyhounds are provided with the best post race recovery facilities and access to immediate treatment that would reduce the impact of any injuries that are incurred during racing.

In addition, part of the data mining regarding breeding outcomes (refer answer 1) should seek to identify approaches that are likely to lead to the breed becoming more robust without compromising pace.

International comparisons should also be undertaken. For instance, the American system seems to produce greyhounds which consistently race for longer periods. Anecdotally, there seems to be a connection in America between the breed being more robust, the tracks being slower but potentially safer, wide arm lures reducing racing congestion and injury risk and a successful grading or benchmarking system.

4. Is it appropriate to introduce risk-based licensing, whereby licence fees are based on characteristics such as breeder size?

The NSW GBOTA supports the suggestion in principle.

5. What initiatives can be implemented to ensure that owners and trainers improve the welfare of all greyhounds?

Education, training and accreditation. In addition, licensing of breeders, rearers, educators and trainers and the properties from which they operate. Trainer licensing should have categories which determine the numbers of greyhounds that are able to be trained. Trainers should only progress to certain categories where they have displayed competency, a commitment to animal welfare and have the facilities and resources in place, as required for the particular category.

6. What incentives could be used to improve the management of greyhound lifecycles by both breeders and trainers? Alternatively, what disincentives can be introduced to discourage the use of unnecessary euthanasia?

The NSW GBOTA believes that accreditation and categorising of breeders and trainers (including assessment of animal welfare commitment and facilities) will in itself be a powerful incentive.

The industry must also foster a culture where-by the owner of a greyhound takes on a whole of life responsibility for every greyhound they acquire. Owners must be supported by their greyhounds having:

- (a) the benefits of acceptable prizemoney and a commitment to safety and animal welfare during its racing career and;
- (b) access to a strong post racing re-homing network that is underwritten to a significant degree as an industry overhead.

But, the owner must accept that they are responsible for (a) the greyhound being provided with every opportunity to have a post racing life and (b) the costs associated with facilitating this.

7. How can the number of greyhounds rehoused be increased?

The NSW GBOTA would propose the following be considered:

- Re-consideration of export controls.
- Development of a wider network of re-homing agencies (American system), including options that may develop wider options such as rehabilitation support, veterans etc.

- Market and develop the Greyhound Adoption community. Make the ownership of a retired greyhound a lifestyle experience.
- Consider the development of new show dog standard for ex racing greyhounds.

8. What is the best means to promote the rehoming of greyhounds?

The NSW GBOTA believes the Greyhounds as Pets and the “Greenhound” brand can be very powerful. If connected to the lifestyle experience, it has the potential to drive demand.

Connecting racing and rehoming publically through on course promotions at race meetings should also be promoted.

All major race meetings should feature adopted greyhound mascots.

Governance reform

9. Do you have a preference among the two structure options identified below?

- **Maintain the current structure, but with enhanced governance arrangements**
- **Introduce a new industry structure with GRNSW being the commercial industry development body, and there a separate government regulator.**

The NSW GBOTA is of the firm belief that the peak body should be responsible for the regulatory and commercial compliance of the industry. Any greater role brings with the inherent risk of conflict.

Racing operations should remain the sole domain of the club structure. The peak body should ensure that appropriate governance procedures, performance and compliance standards and in place but the club structure should operate race club operations and extended businesses, independent of the peak body.

The second option is most closely aligned with the preferred option of the NSW GBOTA.

10. Do you have a preference among the two board options identified below?

- **increase board composition to seven members selected on merit based on appropriate skill sets. Board members would be selected by an independent selection committee making recommendations to the Minister without limiting industry representatives being on the board**
- **increase board composition to seven members, with five independents and two representatives from the industry selected by an independent selection committee (assisted by a recruitment agency) making recommendations to the minister.**

In the model preferred by the NSW GBOTA, a Regulatory Board (also overseeing commercial oversight) would be a five person board with independent skills based Directors. These specialised skills would include: Legal, law enforcement, animal welfare, compliance and finance.

Should, however, the peak body functions include both regulatory and a wider commercial role, then the NSW GBOTA would propose that separate Board structures be in place for the dual functions.

The regulatory Board would comprise five independent skills based nominees (legal, law enforcement, animal welfare, finance).

The commercial Board would comprise seven members. Four members would be independent skills based appointees (commercial, operations and marketing) and three members would be elected by industry stakeholder nominees.

Both Boards would be served by the one Chief Executive and administrative structure.

11. Are there other actions that should be taken to ensure the GRNSW board has appropriate qualifications and experience?

Other than:

- **ensure all GRNSW board appointees are suitably qualified and experienced, and have attended an Australian Institute of Company Directors course**
- **appropriate remuneration is paid to board appointees, that is in line with experience and board remuneration among similar organisations.**

The NSW GBOTA supports the above as pre-requisites. In addition, Board members should be required to undergo continuous professional development and succession planning and mentoring programmes should be in place.

12. Are there other actions that should be taken to maintain integrity and transparency in the greyhound racing industry?

Other than:

- **adopt a new approach to integrity by appointing an Integrity commissioner (or similar) who is able to investigate complaints about integrity and welfare issues at arm's length of GRNSW**
- **increase accountability through increased reporting to government and the public such as quarterly reporting on specific measures. This could cover strategic plan implementation, compliance issues and animal welfare initiatives.**

The NSW GBOTA strongly supports the appointment of an Integrity Commissioner. This appointment must be appointed independent of the industry.

The NSW GBOTA would also suggest the following:

- That quarterly reporting also include stakeholder briefings and strong disclosure regarding strategic considerations and financial planning.
- That industry consultation work to 28 day cycles so as to allow for considered feedback to be provided.
- That the Greyhound Racing Industry Consultative Group, if it is retained, have a role that is precisely outlined and that the body be properly resourced.
- A willingness to listen to the reasonable expectations of participants. For instance, long terms calls for swabbing to include a random element (red marble) and box draws to be undertaken live on-line have been consistently rejected by the controlling authority without, seemingly, a reasonable case for objection.

13. Would making GRNSW responsible for the control of all clubs improve governance and operations of the NSW greyhound racing industry?

No. GRNSW is able to determine governance and compliance requirements (as a requirement of registration) and does not have to directly control/manage clubs to ensure that appropriate governance procedures are in place at club level.

The NSW GBOTA remains of the firm view that the management of the commercial functions of the clubs by the body responsible for regulatory oversight of the clubs is inappropriate and will give rise to issues of considerable conflict.

The peak body of the NSW greyhound industry should be responsible for industry regulation, compliance, overall strategy and supervision. It is able to ensure appropriate industry performance without undertaking the role of the club structure.

14. Are there other areas where club governance needs to improve, additional to those identified?

The NSW GBOTA supports the suggestions that have been proposed by the Joint Working Group. Open membership must be encouraged, appropriately skilled and developed employees are essential and the Board structure should combine the benefits of member elected and skills based appointments.

Properly considered, these initiatives should enable to clubs to increase professionalism without losing identity or the vitality that the membership components invariably brings to a club.

15. Do you agree on the need for all clubs to have a stronger governance model, irrespective of whether they are new or existing clubs?

The NSW GBOTA believes that the peak body should work with clubs to determine the most appropriate governance standards going forward. All clubs should be required to adhere to the agreed governance standards subject to a reasonable timeframe for change implementation, constitution reviews and membership buy in.

Centres of Excellence

- **optimising the number of racing tracks across NSW**
- **ensuring tracks are well managed □ developing high quality infrastructure and facilities across tracks**
- **improving the financial position of clubs □ integrating tracks and clubs with local stakeholders within the community.**

- **Only Centre of Excellence tracks – these tracks will comprise a single facility, featuring all of the facilities and services necessary**

- **Racing Hub with trialling spokes – all racing conducted at the Hub, with other tracks (i.e. the spokes) in the local area used for trialling purposes only. These trialling tracks would be operated from the ‘Hub’.**

- **Racing Hub with racing spokes – racing would be focussed at the Hub, with some racing occurring at one (or more) spoke venues. The spoke venue(s) would have a lower level of infrastructure than the Hub. The racing spoke venues would be operated from the Hub.**

16. Do you have a preference for any of the above options?

The NSW GBOTA supports the third option above. We believe that the Centre of Excellence concept should apply to all regions where greyhound racing is be staged.

Without having a clear definition or description of (a) what a Centre of Excellence would actually be, (b) any understanding of the funding that would be available or (c) the number of race venues that are to exist in the industry’s future operating model, the NSW GBOTA does not think it is possible to commit to single Centres of Excellence serving each individual region.

However, our general expectation is that a Centre of Excellence would involve racing and training facilities at straight, two turn and one turn level, modern and tailored facilities for the customers, state of the art housing facilities for the greyhounds, animal welfare services and secondary income opportunities.

It would be preferred if all of the above could be incorporated in the one venue but this may not be possible in some regions. In such circumstances, the Centre of Excellence principles might need to be provided in a variety of ways over a variety of venues.

17. Do you agree with the overarching principles for there being a track within 2 hours drive for 80 per cent of participants? Are there any other principles that should be applied?

The NSW GBOTA supports the two hour concept. We also believe that the distribution of tracks, should rationalisation take place, must have regard for ensuring as many current participants as possible are still able to continue their involvement in the industry.

We support a TAB presence in each region and fair distribution of prizemoney. Prizemoney, as previously stated, should have a minimum base and then be scaled up depending on the class of greyhound.

18. Is there other infrastructure or services you would expect to be included in a greyhound racing Centre of Excellence?

Other than:

- **track standards - this will include track layout (i.e. one turn, two turn, straight track), as well as track camber and set out. A key consideration in track standards is reducing the risk of animal injury.**
- **trial and education facilities**
- **presence of animal welfare services, potentially including a veterinary practice**
- **hospitality facilities, which can be used on race days, as well as for community events and functions**
- **feature other external income opportunities.**

The NSW GBOTA would suggest the following considerations might also be taken into account:

- Greyhound Adoption Programme (halfway houses or facilities of GAP greyhounds to come back, ensuring a connection to the GAP community and the development of GAP greyhounds being part of a GAP community/lifestyle.
- Socialisation options.

19. What parameters are considered appropriate for venues in terms of flexibility for external income opportunities, as well as having the opportunity to expand racing product if required?

The NSW GBOTA would suggest the following considerations might also be taken into account:

- Tenure arrangements and operational autonomy.
- Proximity to customer target groups.
- Suitability and placement of other commercial development.

Grading systems

20. Do you consider that the aims of the current NSW grading policy are appropriate?

Current Aim:

- **Create a fair, equitable and transparent system for participants to compete that ensures greyhounds with the most appropriate form secure starts and are grouped with greyhounds of like ability.**

- **Ensure the viability of the Industry by promoting the highest standard of racing possible that maximizes the racing career of greyhounds in NSW.**

The NSW GBOTA believes that the current aims remain relevant as guiding principles. Further emphasis is required regarding the need to provide competitive racing opportunities for as many greyhounds as possible in various age groups and of differing performance capacities.

21. Are the below areas where changes to grading policy should be targeted?

Other than:

- **juvenile dogs, with the current grading rules, in combination with race programming, often placing young and inexperienced dogs into 5 th grade before they are ready. A consequence is that dogs of proximate ability are not always matched within races.**
- **older dogs, with the current grading system not supporting the extension of dog racing careers.
weaker and less competitive dogs, who often are unable to get a start.**

The NSW GBOTA supports all of the above. In addition the following should be considered in conjunction with the grading policy.

- Six dog maiden events.
- Commitment to high grade racing without penalising low grade greyhounds in pursuit of top down grading principles. This can be achieved by a commitment to five dog fields for events grade three and above where required for distances 500m and above.
- Commitment to staying greyhounds, again including a tolerance for fields containing less than eight contestants.
- Prizemoney incentivisation. Scaled progression from base level for less than 400m, next level for less than 500m, next level for less than 650m, top level above 650m.

22. What elements can be included in grading without making the grading process unduly complex?

The NSW GBOTA reiterates the need to reconsider current benchmarking principles. Matching capabilities of greyhounds at various stages of their career must be the fundamental objective of the benchmarking system.

23. Do you consider that the proposed changes will improve NSW grading policy, and greyhound racing more generally?

Targeted changes:

- **establishing an additional grading system for older dogs, which would be able to race within standard graded races, in addition to masters races**
- **adjusting grading classifications, such that younger and less experienced dogs, as well as less competitive dogs, are protected and compete against greyhounds of their own age and ability longer**

- **incorporating the weighted points score (currently only used for determining order of entry) into the grading classification method.**

The NSW GBOTA supports the targeted changes suggested in section 5.3.3 of the discussion paper as outlined above.

24. Are there other targeted changes to grading policy that should be made?

The NSW GBOTA would support the addition of Tier 3 racing or something similar for the lower class greyhounds

25. What actions can be taken by GRNSW to improve the operation of grading?

The NSW GBOTA would propose the following additional considerations:

- Benchmarking comparisons internationally.
- Removal of two grades at metropolitan level. A1 and A2 to be combined with beat the grader provisions.

Wagering and Financial Reward Landscape

26. Are there other changes that should be made to the approach to prize money allocation outlined below?

Other than:

- **Group Racing – decreasing the volume of Group racing, with associated savings allocated equally across all racing tiers**
- **Super Saturday – ensuring one weekly metropolitan meeting (on a Saturday), with prize money at a level comparable to that of other states**
- **Selective targeting in line with strategic priorities, such as continuing to provide greater prize money for distance racing.**

The NSW GBOTA strongly rejects any reduction to current Group Race levels. Group racing remains the ultimate ambition of all participants. Group race levels are currently much higher in Victoria and any further reduction to this tier of the industry would have negative impact on the overall brand of NSW racing.

The NSW GBOTA also strongly rejects the concept of only one major metropolitan greyhound race meeting in NSW. The NSW GBOTA believes that the NSW greyhound industry must strive to have two metropolitan meetings of comparable standard with Victoria. This should be a clear objective of the overall reform agenda.

The super Saturday concept can be achieved by marketing and focussing of feature racing on Saturday nights.

The NSW GBOTA supports special targeting of specific events. This objective in fact supports Group Racing and metropolitan racing being developed as a premium brand.

27. Are there other actions that should be taken to improve the wagering product?

Other than:

- **having no (or less) non-TAB racing**
- **introducing Super Saturday Night racing** □ **increasing national cooperation on wagering product**
- **improve venue presentation for television.**

The NSW GBOTA would propose the following additional considerations:

- Better use of technology with vision.
- Improved used of form data.
- Speed maps, rating system revamp.
- Wider use of new media and interaction with non Tab wagering operators.

28. What specific actions can be taken to improve race quality, such as improving average field size, reducing track –related interference, and increasing the quantum of distance racing?

The NSW GBOTA would again assert that the industry must present racing with an animal welfare focus...the best tracks, the safest tracks, the best commitment to greyhounds care and welfare and the fairest form of competition. The NSW greyhound racing brand should aspire to secure this ground, as opposed to the lotto on legs approach that has driven the provision of race meetings on and above levels that are seemingly justified commercially.

29. Will increasing the average size of race fields in NSW greyhound races increase overall greyhound racing turnover?

The NSW GBOTA believes that animal welfare and safe racing have a stronger connection to the industry's ethical and sustainable future. Only when these objectives are absolutely in place, should there be any pre-occupation with full fields.

The NSW GBOTA does not accept that sufficient evaluation of the wagering impact of small field racing – particularly where contestants are evenly matched and of high quality – has taken place. We further question the view that reduced field size racing, where circumstances require it, is in fact such a substantial commercial issue for the NSW industry, particularly in view of the fixed distribution arrangement that applies to TAB wagering earnings.

30. Are there other actions that can be taken to improve access to greyhound racing wagering?

The NSW GBOTA reiterates the need to exploit new media opportunities.

31. What specific actions do you think will generate the greatest positive impact?

Other than:

- **improve 'The Dogs' product (both smartphone application and website) to facilitate wagering**
- **work in conjunction with Sky channel and their affiliates for broader coverage**

The NSW GBOTA believes that betting rules should be considered. Wagering customers should not be able to be banned and should be able to invest to minimum loss levels.