



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

Response to:

Joint Working Group Draft Report

**Implementing Reform in the New South
Wales Greyhound Racing Industry**

Circulated: 18 December 2015

Submitted: January 10, 2016

To:	Greyhound Racing NSW (GRNSW) Email: policy@grnsw.com.au
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 Draft Report

Wastage of greyhounds is at the centre of animal welfare concerns

Recommendation 1

The JWG recommends that GRNSW expand greyhound registration and monitoring to cover the entire lifecycle. This is to encompass:

- **registration and monitoring of greyhounds, alongside periodic assessment of greyhounds at key lifecycle stages by integrity officers**
- **identification of performance measures related to key stages of animal welfare and development across the lifecycle.**
- **collection, analysis and public reporting of performance measures in either the GRNSW Annual Report, or a separate publication.**

The NSW GBOTA supports the recommendation in principle.

It would, however, seek to further understand what is meant by Integrity Officers and the qualifications and powers of same. The NSW GBOTA believes that the relationship – with specific regard to performance measure education and monitoring – between the Integrity Officers and industry participants needs to be positive and supportive, as opposed to being purely of a policing nature.

In addition, the NSW GBOTA would seek to be formally involved in the determination of performance measures as they are formulated. It is important that these be determined in a collaborative manner.

Recommendation 2

The JWG recommends that GRNSW expand the registration and licensing of greyhound handlers to cover the entire lifecycle. This is to also include:

- **the introduction of minimum standards, alongside the completion of a educational qualification (with exemptions available for recognition of prior learning)**
- **periodic licence and registration renewal being subject to appropriate greyhound outcomes, including re-homing and the rate of greyhounds passing away due to injury.**

The NSW GBOTA supports the recommendation in principle.

The NSW GBOTA would seek to be formally involved in the determination of the minimum standards as they are formulated. It is important that these be determined in a collaborative manner.

Recommendation 3

The JWG recommends that GRNSW:

- **obtain legal advice on whether a breeding quota is legally enforceable under existing New South Wales and Commonwealth Government legislation, including advice on which legislative amendments may be required**
- **drawing either from the impending findings of the current Greyhounds Australasia project, or separate analysis, identify a state-wide breeding quota, which is determined six-monthly. This analysis should also identify an appropriate phase-in period.**
- **undertake further analysis to identify the merits and practicalities of implementing the state-wide breeding quota through either a central determined allocation to breeders, or an auction process. Under both approaches there should be separate allocations for ‘hobby breeders’ and ‘professional breeders.’**

The NSW GBOTA, following further consideration, conditionally supports the concept of a quota system. The role of an overall quota in ensuring the industry does not overbreed is understood and supported.

The NSW GBOTA supports the quota being reviewed on a six monthly basis. In addition, it would propose that the entire quota system should be subject to a total review on a two yearly basis.

The NSW GBOTA notes that the findings of the GA report will be taken into account in the process of determining the quota. Notwithstanding this, the current reliance of other States on NSW breeding must obviously be a crucial point of consideration.

The NSW GBOTA notes that the JWG understands that overbreeding must be addressed from a variety of perspectives. Whilst the first step is to reduce the number of greyhounds being bred, the commitment to supporting strategies that will increase the number of greyhounds that are able to engage in racing careers by (a) applying performance measures to breeding, rearing, education and training activities and (b) increasing racing opportunities for greyhounds of all racing capabilities, is essential.

In addition, re-homing strategies need to be strengthened.

Finally, the international export market is an additional option which should proactively explored. The NSW GBOTA does not support exporting of greyhounds to any jurisdictions where-by the animal welfare standards are not to a level approved by Greyhounds Australasia.

However, where appropriate animal welfare protocols are in place, or can be put in place, then exporting of Australian greyhounds remains an option that will need to be considered in the quota determinations made from time to time in the future.

In line with the JWG views, it is essential that any quota system not unfairly restrict opportunities for hobbyists. In addition, an exceptional circumstances clause which would allow the quota to be broken should be built into the overall system.

Recommendation 4

The JWG recommends that GRNSW:

- **investigate the success of greyhound re-homing activities undertaken in the United States, to identify approaches that could be effectively applied in NSW.**
- **further investigate options for financing greyhound re-homing, including application of a prize money levy, or an increased registration or licence fee for owners.**

The NSW GBOTA strongly supports the recommendation.

In addition to the points raised, the NSW GBOTA believes individual owners should have the option of being able to have a portion of any prizemoney earned by a greyhound placed into a retirement trust for that greyhound. This would be refundable to the owners at the time of the greyhound's racing retirement so as to assist with the next phase of the greyhound's lifecycle.

The NSW GBOTA would further suggest that incentives should be put in place for registered participants that retain former racing greyhounds. Where a greyhound was retained for a period of time, certain benefits such as reduced registration fees should be offered.

A new governance model will restore community trust in GRNSW

Recommendation 5

The JWG recommends a new structure for GRNSW that maintains both the regulatory and commercial functions with more definite structural separation.

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.

Recommendation 6

The JWG recommends:

- **A new board structure that includes five independent and two independently selected industry representatives**
- **A skills matrix for the Board that includes specific finance, risk, government, community relations, marketing, legal and regulatory skills and animal welfare experience.**
- **Only those with suitable qualifications be eligible for board appointment**
- **The continuation of the current board selection arrangements with a focus on diversity.**

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 and the reasonable regulatory needs would be budget approved as a first charge against wagering earnings.

The NSW GBOTA would emphasise the need for the JWG to reconsider the conflict that will potentially arise as a result of the one body undertaking both regulation and commercial development. This potential conflict must be countered, at the very least, by a separation in decision making at Board level.

Recommendation 7

The JWG recommends:

- **Increased transparency and accountability through increased frequency and nature of reporting to government and to the public and the industry including the development of a comprehensive reporting framework that addresses regulation throughout the lifecycle.**
- **Reporting publicly on a number of specific animal welfare reporting measures including, injury, fatalities and injury related euthanasia**
- **Reporting publicly against the strategic plan to demonstrate improvement**

The NSW GBOTA strongly supports the recommendation.

Recommendation 8

The JWG recommends the appointment of a greyhound racing integrity commissioner.

The NSW GBOTA strongly supports the recommendation with its expectations being that the greyhound racing integrity commissioner would be appointed and undertake a role similar to that in place in Victoria.

Recommendation 9

The JWG recommends the establishment of a new Ministerial Advisory Committee

The NSW GBOTA strongly supports the recommendation.

Whilst sharing the JWG conclusion that GRICG is not successful in its current form, the NSW GBOTA notes that GRICG has never been properly resourced to carry out the role that was envisaged in the Greyhound Racing Act. Given this, it is important that the suggested committee has a role that is clearly defined and that the committee is properly resourced to undertake the strategic role that is proposed by the JWG.

The NSW GBOTA remains open to the possibility of committee members being remunerated.

A move to establishing centres of excellence calls for improved club governance

Recommendation 10

The JWG recommends:

- **Minimum club board requirements to include a 7 member board with 4 elected board members and 3 independent directors with a mix of skills that draws on the business acumen of the local community and selected by a selection committee that includes a GRNSW representative.**

The NSW GBOTA is currently undertaking a Strategic Review of its operations, including governance, strategy and resourcing. The composition of its Board is an important part of this consideration.

At an industry level, the NSW GBOTA would support a reduction in Board size and the inclusion of independent, skills based appointees.

However, some latitude should exist within the requirements, if these requirements are to become conditions of registration. In forming the ultimate recommendations for Board composition, the following should be considered:

- The future role of the clubs.
- Best practice governance principles.
- Government recommendations for the not for profit sector.

With regard to appointment of independent skills based Directors, the NSW GBOTA believes that these be appointed via a Recruitment agency. The briefing to the Recruitment agency should be determined by the club, with input from GRNSW.

Whilst Board composition is accepted as a fundamental pillar, improving the skills of Board members and setting of minimum training requirements should also be part of any reform to Board governance procedures.

Recommendation 11

The JWG recommends:

- **An enhanced club governance model be adopted that continues with each club as a separate entity with a consistent constitution.**
- **The legislation be changed to enable GRNSW to conduct race meetings.**

The NSW GBOTA supports enhancement of the club governance model.

However, the concept of single organisations being able to conduct racing over a number of centres should still be provided for. The financial and strategic benefits of such structure should in fact be encouraged.

The NSW GBOTA strongly opposes any legislative change which would permit GRNSW to conduct greyhound racing. Good governance would support separation of regulatory oversight and actual racing operations. It is fundamental that requirement should at no time, in no circumstances, be compromised.

A new Centres of Excellence model is required for the industry to be sustainable

Recommendation 12

The JWG recommends that GRNSW undertake further specification and analysis of the Centre of Excellence concept. This further work should identify:

- the specific features of a Centre of Excellence, including how these features should vary between Centre of Excellence tier
- indicative costs of establishing and operating a Centre of Excellence facility
- the financial and other resources potentially available to finance the development and operation of Centres of Excellence.

The NSW GBOTA supports the Centre of Excellence concept and the recommendation of the JWG.

Whilst a total Centre of Excellence in each major region would be desirable, the NSW GBOTA accepts that the fall back position may be to provide Centre of Excellence principles to each region over more than one track.

The NSW GBOTA believes that is essential that the Centre of Excellence concept ensure that a fair distribution of prizemoney and TAB racing be provided to all regions.

With specific regard to metropolitan area, it remains essential that this region have a facility which is considered as the industry showpiece and gateway.

A best practice grading system will enhance animal welfare

Recommendation 13

The JWG recommends that GRNSW amend the aims of the grading policy to include the objective: 'Provides the opportunity for the greatest possible number of greyhounds to participate in racing, irrespective of their age or experience'.

The NSW GBOTA suggests the objective should be further amended to include to read as follows:

*'Provides the opportunity for the greatest possible number of greyhounds to participate in racing, irrespective of their **racing capability**, age or experience'.*

Recommendation 14

The JWG recommends that GRNSW make the following specific changes to the NSW grading policy:

- **tightening eligibility for greyhounds to be classified as masters. This classification should take into account both age and recent racing performance**
- **introduce two additional grades, 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.**
- **undertake further analysis to determine criteria for classification as a masters greyhound, as well as eligibility for the two recommended additional grades.**

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.

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, 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. Support for this particular initiative is conditional on the implementation of the proposed \$1000 first prize minimum (refer recommendation 16).

Recommendation 15

The JWG recommends that GRNSW:

- **develop specific objectives for race programming, to be applied by clubs in future programming decisions**
- **if necessary, proactively influence club programming in the future to ensure the objectives underpinning grading policy changes can be achieved.**

The NSW GBOTA supports programming remaining a club function in liaison with GRNSW. Against this background, the recommendation is supported.

The future sustainability of the industry also depends on improving the wagering and financial rewards landscape

Recommendation 16

The JWG recommends that GRNSW:

- **revise the allocation of prize money, such that the minimum amount paid for 1st place is \$1,000, resulting in a flatter allocation of prize money across grades**

- **provide targeted prize money allocations to support strategic priorities, including Super Saturday, and increased distance racing**
- **apply a constant prizemoney distribution between 1st, 2nd and 3rd place of 60 per cent, 25 per cent and 15 per cent.**

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 would emphasise 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.

The NSW GBOTA strongly rejects any reduction in Group Race or its prizemoney levels. Group racing remains the ultimate ambition of all participants. The Group Racing footprint is currently much higher in Victoria and any further reduction to this tier of the industry in NSW 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.

The application of a constant prizemoney distribution percentage is supported. The NSW GBOTA current preference would be 70%, 20%, 10%. A shift to a lower percentage for the winner has merit so long as the total amount distributed to the winner remains acceptable.

The NSW GBOTA, whilst supporting minimum prizemoney levels, is concerned that a level of social racing will still be required so as to ensure the majority of greyhounds and participants are able to enjoy some level of involvement. Currently, this space is filled by non TAB racing.

The NSW GBOTA would suggest that a level of picnic racing may be needed to support the minimum prizemoney all TAB racing model. In addition, the introduction of drag lure coursing (as provided in SA and Victoria) should be considered. The Appin track is perfectly positioned to provide this service.

Recommendation 17

The JWG recommends that GRNSW undertake, or commission, further analysis to:

- **identify specific proposals to reduce track-related interference**
- **examine whether increased distance racing will contribute to improving race and breeding quality**
- **identify an optimum number and mix of races**
- **identify the extent to which reforms proposed by the JWG are likely to increase average race field size.**

The NSW GBOTA supports completely considerations that will lead the presentation of racing with an animal welfare focus...the best tracks, the safest tracks (with turn starts minimised, if not eradicated) and a commitment to greyhound care 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.

The NSW GBOTA believes that animal welfare and safe racing are fundamentally connected 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 been genuinely measured. It further questions 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.