



Dogs' Homes of Tasmania

(Operated by the Tasmanian Canine Defence League Inc.)

SUBMISSION: Review into the *Racing Regulation Act 2004*

February 2022

SUBMISSION

The Tasmanian Canine Defence League Inc., trading as the **Dogs' Homes of Tasmania**, (DHoT), welcomes the opportunity to present a submission into a review of the *Racing Regulation Act 2004*.

Our concerns and comments relate to regulation and management of animal welfare in the greyhound racing industry.

DHoT seeks the opportunity to be a part of the consultation process either individually or in collaboration with other animal welfare organisations.

DHoT shares the views of other animal welfare organisations, and many Tasmanians, of the urgent need for more effective Government regulation and management of animal welfare issues of both the equine and canine racing sectors.

As Tasmania's largest canine welfare organisation, our specific interest sits with the welfare of greyhounds however we support the best of welfare outcomes for all animals.

It has always been the position of DHoT, that greyhound racing be prohibited and at the very least it should not be supported with public funding.

Whilst the cessation of greyhound racing remains an aspiration, we are committed to improving the welfare management of greyhounds involved with the racing sector. Consistent with this position, we successfully obtained accreditation to unmuzzle greyhounds as a practical way to assist with their rehoming and welfare management.

We have also, through ORI, and during a period of staffing changes at GAP, offered assistance with their assessment process to help advance the more timely rehoming of greyhounds. To date, this offer has not been taken up.

DHoT does not accept Tasmania's animal racing regulations oversee effective and acceptable welfare management practices, and to use a colloquial term they "fail the pub test".

Whilst the sector is subject to the provisions of the *Animal Welfare Act 1993*, this instrument does not appear to provide the specific rigour to adequately regulate animal welfare in the racing sector. Equally, whilst the *Racing Regulation Act 2004* makes references to animal welfare, it also lacks the rigour to effectively oversee welfare management of the racing sectors.

Under current practice, welfare incidents and issues are rarely investigated at arm's length from the racing industry. There are too few occasions where an independent body such as the RSPCA Inspectorate is involved in this process.

Additionally, there is greater integrity using the RSPCA inspectorate to audit welfare practices within the industry as a practical way of engendering a culture of best practice.

Emerging international and Australian legislation recognises animals as sentient beings that are able to subjectively feel and perceive the world around them, consequently acknowledging the intrinsic value of animals and imposing a general duty of care on people to ensure good animal welfare practices.

The review of the *Racing Regulation Act 2004*, presents a unique opportunity for Tasmania to embrace best practice, recognise animals as sentient beings and provide a level of oversight that places animal welfare management standards and practices as the most prominent of all racing regulations.

It is no longer acceptable that Tasmanian greyhound racing experiences issues of overbreeding, unacceptable levels of injury, high euthanasia rates, issues with poor canine accommodation, lack of enrichment, socialisation, natural exercise all of which negatively impacts on the mental health and wellbeing of greyhounds in Tasmania.

DHoT advances regulatory and governance changes that ensure effective animal welfare management as the primary focus of the *Racing Regulation Act 2004*, ensuring animal welfare standards are clearly stated, imposed, rigorously enforced and animal management practices regularly audited to maintain compliance.

DHoT's specific welfare concerns with Greyhound racing in Tasmania include:

- **Overbreeding**

The imperative to select the fastest dogs to race provides breeders with an incentive to over-breed.

They can then select the best dogs from a litter for training for competition.

Currently the Greyhound breeding data reported to Tasracing is self-reported and Tasracing notes that it is not independently verified¹.

In July 2020, Independent Member for Clark, Mr. Andrew Wilkie MP, requested an investigation into the fate of 262 greyhound pups that disappeared from records between 2016 and 2018. The reporting of pups whelped is voluntary, and it is likely the number of pups disappearing from records before registration, is higher than the numbers noted by Mr. Wilkie.

¹ *Tasracing Annual Report 2021*, p16.

- **High euthanasia rates and low rehoming rates**

Between 2016/2017 and 2020/2021, an average of 31% of all greyhounds retiring from racing were euthanised².

DHoT acknowledges the work undertaken to improve outcomes for retired greyhounds that includes assistance with desexing costs and an increase in the number of rehoming organisations.

Despite these initiatives, the current rate of euthanasia does not meet community expectations or standards of humane care. No healthy/treatable, behaviourally sound greyhound should be euthanised simply because it is no longer wanted for racing and cannot find a pet home.

- **Poor housing conditions, lack of socialisation and lack of environmental enrichment:**

DHoT is not responsible for and cannot inspect specific housing of greyhounds in training.

DHoT is an organisation that rehomes ex-racing greyhounds and we observe and assess the condition of greyhounds presented into our care.

Sadly, regular presentations include greyhounds with:-

- rotten and painful teeth due to poor diet,
- worn down teeth from biting against pen bars in frustration,
- bald patches consistent with lying in concrete pens without bedding for long periods.

The overwhelming majority of greyhounds arriving at DHoT for rehoming cannot climb a simple set of steps, or step into and out of a vehicle without being lifted.

These are the consequences for dogs who have never experienced an environment other than concrete pen or racetrack.

We expend considerable time helping each greyhound to naturally behave as a dog to enjoy enrichment, and the simple pleasure of the human and animal bond.

²*Ibid.*

DHoT submits the following changes to the current regulations and practices;

1. Setting a timeline for at least the end of public funding of greyhound racing with the long-term goal of banning greyhound racing in Tasmania.
2. Ensuring animal welfare management is the primary focus of all aspects in the life cycle of a greyhound that removes unacceptable training methods and practices causing pain, suffering and injury.
3. Setting animal welfare standards that embrace universal best practice and are clear and well understood, imposed, enforced and practices regularly audited to enhance compliance.
4. Nomination of RSPCA as a fully independent body to audit and investigate animal welfare standards. Funding provided RSPCA to support this function.
5. Funding to welfare bodies such as DHoT to assist TAFE with mandatory education and training on contemporary animal welfare standards and the provisions of the *Animal Welfare Act 1993* for licensed participants within the greyhound industry.
6. Changing the legal status of animals to sentient beings.
7. Removing direct employment status of vets in the industry so they are truly independent of existing racing bodies.
8. Ensuring a registration system for all breeders and trainers that includes accreditation against animal welfare standards and best practice welfare management and limiting the number of animals in the care of any one individual or group.
9. Increased regulatory inspection of properties breeding and training greyhounds to enhance best welfare practices.
10. Implementing greater transparency of statistical data for full tracking of all greyhounds to monitor litter numbers, pups whelped, transfers, life outcomes including reasons for euthanasia. This information to enable public scrutiny of the implementation of animal welfare standards and performance against these standards.
11. We support requests for greater transparency of the financial and performance operation of GAP. We share concerns that there appear to be delays in processing the assessment of dogs and consequently their rehoming. Of great concern is the impact of any delay on the mental health and wellbeing of the dogs.

DHoT conducts a comprehensive dog behavioural assessment process that was slightly modified to accommodate greyhound assessment as we achieved Unmuzzling Accreditation. We note there are a number of organisations now Accredited and whilst there are similarities with each of the assessment programs there are also a number of different practices. It remains unclear to us how best

practice is fostered ensuring each assessment program is robust in its methodology and the skill set of each of its users.

12. DHoT understands the history for the creation of GAP and its legal relationship with ORI. We believe it would be more transparent and cost effective to contract the service to an independent and qualified animal welfare organisation and preferably one such as DHoT with long standing experience in assessment and rehoming dogs across Tasmania. We believe the function of GAP should be outsourced through public tender to a truly independent of racing organisation engaged under a funding and service contract.

ORGANISATIONAL OVERVIEW

Dogs' Homes of Tasmania (incorporated as the Tasmanian Canine Defence League Inc.) is the largest dog welfare organisation in Tasmania. Every year our homes at Hobart, Devonport, Burnie and Launceston, reunite lost and stray dogs with their owners, and find new, caring homes for unwanted and unclaimed dogs, caring for over 3,000 dogs each year.

We provide a negotiated fee-based pound shelter for the following municipalities:

Devonport, Latrobe, Kentish, Hobart, Clarence, Glenorchy, Brighton, Burnie, Waratah/Wynyard and Launceston.

We have legal arrangements to provide fee-based dog transfer services for the following municipalities (known as Outer Councils):

Dorset, GeorgeTown, Meander Valley, Northern Midlands, Derwent Valley, Huon Valley, Central Highlands, Central Coast, Kingborough, Sorell, Southern Midlands, Tasman, West Coast, Central Coast and Circular Head and West Tamar.

We also accept stray and surrendered dogs from members of the public, dogs brought in by the Police and dogs transferred from other welfare organisations including the RSPCA. We have formal transfer agreements with a number of these community organisations. In addition, we assist community organisation A Paw Up and have formal arrangements to supply dogs to Australian Lions Hearing Dogs, Misha's Mates and the Australian Federal Police Canine Unit.

We are a founding member and the Tasmanian affiliate (hold national Directorial status) with national body, the Companion Animal Network Australia (CAN).

TASMANIAN CANINE DEFENCE LEAGUE

The Tasmanian Canine Defence League (TCDL) trades as the ***Dogs' Homes of Tasmania*** and has been operating since 1950.

TCDL operates four Dogs' Homes each comprising a Pound and a Shelter, located in Hobart, Devonport, Launceston and Burnie.

TCDL is an Incorporated Association and is a Registered Charity with Deductible Gift Recipient (DGR) status.

TCDL operates under an elected Board of Management with delegated authority through the Chief Executive Officer.

The current TCDL Board is:-

Carol Hughes – President
Denise Bower – Vice President
Patricia Brown - Treasurer
Aaron McClurg - Secretary / Public Officer
Dr. Megan Alessandrini
Maxine Hindell
David Jackson
Jencie Harrington

Chief Executive Officer is **Michael Sertori**.

TCDL is Tasmania's largest canine welfare organisation and has been providing dog shelter and rehoming services for stray, lost and unwanted dogs for 70 years.

SERVICES SUMMARY

1. Care for impounded dogs and collect impoundment fees for Council impounded dogs
2. Care for lost, stray and surrendered dogs brought in by members of the public
3. Accept dog registration payments
4. Microchipping of dogs
5. Support enforcement officers in the identification of impounded dogs
6. Adoption centre for unclaimed stray and impounded dogs, and unwanted dogs surrendered by members of the public
7. Boarding of dogs (Burnie and Devonport)
8. Boarding of cats (Devonport)
9. Foster care for temporary home for dogs prior to adoption
10. Crisis care
11. Sale of a range of products and dog food.

CONTACT DETAILS

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