

**NAWAC report on New Zealand Greyhound Racing Association Incorporated's implementation
of greyhound welfare reforms to date
30 August 2016**

Background

This report responds to a request from the Minister for Primary Industries to the National Animal Welfare Advisory Committee (NAWAC) to provide advice on the New Zealand Racing Board's (NZRB) second report on Greyhound Racing New Zealand's (GRNZ) implementation of greyhound welfare reforms. GRNZ is the tradename of the New Zealand Greyhound Racing Association Incorporated (NZGRA); NZGRA will be used throughout this document.

The racing industry is governed by the NZRB in accordance with the racing Act 2003. The NZRB liaises between the Minister for Racing and the three racing codes. It provides governance and oversight to the industry and the NZGRA through approval of annual statements of intent and business plans.

The NZGRA administers the Rules of Racing, and also issues and implements a number of regulations and policies

The New Zealand Racing Integrity Unit Ltd (RIU) was created in 2011 and is an independent organisation responsible for integrity matters in the NZ racing industry; policing the rules.

All individuals training greyhounds in New Zealand have to be registered as a member of NZGRA and must apply to be a licensed person.

In 2013 WHK completed an independent welfare review into the welfare of greyhounds. This review covered the issues of: standards; enforcement; breeding industry regulations; database management and greyhound tracking; and, industry awareness and options for education. It put forward 36 recommendations for improvement. Key findings included; a lack of enforcement and awareness of welfare standards, leading to a culture of non-compliance; inadequate tracking and reporting of the lifecycle of greyhounds; the issue of the euthanasia of, and transparency around the euthanasia of, healthy greyhounds; and track safety and injuries. (Full report available: <https://www.thedogs.co.nz/Files/Downloads/Independent%20Review/WHK%20NZGRA%20Independent%20Welfare%20Review%20Report.pdf>).

In June 2014 NZRB completed the first of their reports, reviewing NZGRA's implementation of the 36 recommendations of the independent welfare review. NAWAC provided comments to the Minister on NZRB's report; concluding that there were no significant concerns and the efforts of NZGRA to improve the welfare of the animals in their sport were commended. The issue of greatest remaining concern was noted to be the number of dogs that have to be disposed of. It was also noted that the Greyhound Racing Welfare Code was light on guidance for appropriate training procedures. NAWAC's full report is included in Appendix One. Comments on advances relating to both of these points are addressed within this report.

In December 2015 Minister for Primary Industries requested NAWAC to provide advice on the NZRB's second report on the implementation of greyhound welfare reforms; in particular addressing overpopulation and euthanasia. In compiling this advice, after discussions with the full NAWAC committee, John Hellstrom met with both Greg Kerr and the CEO Phil Holden at the NZGRA headquarters on the 30th May in order to finalise NAWAC's thoughts on NZRB's second report. The primary purpose of this meeting was to substantiate some of the statements made by NZRB within their report. A wide range of welfare issues was discussed:

- Tracking of greyhounds
- Imports / Exports
- De registration from racing
- Euthanising statistics
- Litter sizes
- Breeder success
- Breeder subsidies
- Inherited disorders and identified health issues
- Greyhound retirement programs
- Tier two races vs C1 sprints
- Petrol vouchers
- Breaches of minimum standards in the Animal Welfare (Racing Industry Greyhounds) Code of Welfare 2013
- Injury data: Track safety and reducing injuries
- Organisation and Strategy
- Educational Initiatives

Overall, NAWAC continues to fully support the intent of the original 36 recommendations from the independent welfare review, and commends NZGRA for the continued progress which they have made. NAWAC is pleased to see that the NZRB have continued to review these recommendations and are largely commenting favourably on them. Full details supporting NAWAC's final advice to the Minister are included below:

Tracking of Greyhounds

The original review reported inadequate tracking of greyhounds from whelping to where they end up at the end of their racing careers; including a concern over those dogs which were whelped but never made it to the track. They recommended tracking from birth. In their first review, the NZRB had also noted that a gap existed in that official tracking is only required from 3 months when the dogs are registered, micro chipped and ear branded and enter the system.

All animals are identified on a national database held by NZGRA and can now be tracked from birth. Registration of whelping is now undertaken, with each individual puppy being allocated its own ID and litter number. When dogs are named, this replaces their litter number.

NAWAC notes that the NZGRA database will continue to evolve to meet stakeholder expectations. Stakeholders are defined very broadly, including everyone with a potential interest in greyhound racing, e.g. the general public, members, anti-greyhound racing organisations such as Greyhound Protection New Zealand, and other interest groups such as the RNZSPCA, New Zealand Veterinary Association and NAWAC.

Imports / Exports

Import numbers of greyhounds have been set at around 250 per year and are monitored by the NZGRA Board. In response to the banning of greyhound racing in NSW, NAWAC notes that NZGRA is introducing a new importation system, in force as of 1st August 2016: <https://www.thedogs.co.nz/News.aspx?NewsID=2020>. This system restricts imports of greyhounds to no more than 20 dogs per month. NAWAC will continue to follow developments in this area in light of the recent banning of greyhound racing in New South Wales (Australia).

MPI have noted that this importation system does not interact with their own import requirements.

De registration from Racing

Since February 1st 2014, a rule has been in place requiring that NZGRA is notified within 7 days when a dog has ceased racing. De registration reasons must be notified at the time and signed by the trainer. The NZGRA Welfare Manager, tracks dogs within the NZGRA's databases (a report is generated going back three months from the current date and reports on dogs which are not raced within this period), follows up all de registrations and refers any breaches to the RIU.

NAWAC supports the introduction of a revised certificate of de registration (from 1st August 2016). This certificate has been peer reviewed and endorsed by the New Zealand Veterinary Association and Companion Animal Society. It covers the full spectrum of reasons behind the de registration of a dog: retirement for rehoming; retirement for breeding; death / euthanasia (as a result of being unsuitable for rehoming, injury, illness / age, at veterinary advice or at owner request); exportation; and other.

NAWAC notes that to date the Animal Welfare Officer (AWO) and Racing Integrity Unit (RIU) have not had to follow up on any reports of dogs being de registered in contrary to this rule.

Euthanising statistics

NAWAC notes that the greatest public ethical concern is the number of dogs that have to be disposed of, though, if euthanasia is conducted humanely this is not an animal welfare concern.

In 2014 NZGRA introduced a new rule (132) requiring all dogs euthanased to be notified with the reasons why to NZGRA. The notice must be done on the official form and signed by the veterinarian. Euthanasia without a supporting veterinarian certificate incidents (for example, urgent response by the trainer) are followed up if repeated. There is the option of exhuming, and performing a necropsy on, any dogs where this is questioned. NZGRA report this has only happened once within the last three years.

Euthanasia and mortality data is compiled from the NZGRA database and reported to the NZGRA Board every month. It is a Board policy to ensure the robustness and accuracy of the data before reporting. Until NZGRA are confident that the information is reliable the information remains confidential to the Board. NAWAC notes that whilst the database system itself appears to be robust, the current way that figures are reported appears clumsy and does not enable NAWAC to confirm total numbers of animals being euthanised or rehomed, nor at which point in their lives this is occurring. NAWAC recommends that NZGRA move to cohort identification for reporting all euthanasia statistics, e.g. by age-group to facilitate life-cycle tracking of individual greyhounds if needed. NZGRA should be providing annual summaries of these statistics and be proactive in making this information publically available.

After looking at samples of the information being reported from the NZGRA database, NAWAC remains uncertain about the number of dogs which are being produced or imported each year, and where they will end up once their racing career is finished; in particular as even high grade dogs tend to only have a racing life of 1-4 years. Whilst re-homing through Greyhounds as Pets is offering one avenue for these dogs, there is a risk of this avenue reaching saturation point given the length of a dogs lifespan vs its racing life duration.

Approximate figures:

- No. imported per year = s 9(2)(ba)(i), s 9(2)(g)(i)
- No. born per year = s 9(2)(ba)

- Microchipped, ear branded and registered at 3 months.
- Named and start racing / trialling at 14 months of age. Trialling usually starts at 14 months, though dogs can take part in a work out day earlier than this.
- No. racing each season = § 9(2)(ba)(i), s 9(2)(g)(i)
- Racing lifespan= § 9(2)(ba)(i), s 9(2)(g)(i)
- No. rehomed through GAP each year = § 9(2)(ba)(i), s 9(2)(g)(i)

§ 9(2)(ba)(i), s 9(2)(g)(i)

Litter Sizes

The current average number of puppies per litter is stable at 6.5.

The Animal Welfare (Racing Industry Greyhounds) Code of Welfare 2013 requirements around frequency of mating do not exactly match the Animal Welfare (Dogs) Code of Welfare 2010 recommended best practice in this area; though the latter are cited within the former. Whilst noting that references within NAWAC's Dog code of welfare are only recommended best practice guides, NAWAC recommends that NZGRA works towards achieving best practice. In particular by requiring that bitches are not mated so as to whelp and rear litters on consecutive seasons, and requiring veterinary advice to be sought before mating bitches of 7 years of age or more.

- *NZGRA MS No.12 (2): A greyhound bitch should not give birth to more than 6 litters during her lifetime. NZGRA may permit a greyhound bitch to give birth to no more than TWO additional litters to the 6 litters referred to in subsection (2) if,*
 - Prior to a mating or insemination leading to such birth—(a) a veterinary practitioner certifies that the pregnancy and birth do not present a risk to the health or welfare of the bitch, and (b) the certificate is lodged with NZGRA.*
- *NZGRA MS No.12 (3): No bitch can be served upon reaching her 9th birthday. Dog code section 6.2, RBP (ci): Veterinary advice should be sought before mating bitches of 7 years of age or more.*
- *NZGRA MS No.12 (4): A bitch needs a break of at least one heat cycle after whelping two consecutive litters (if she cycles every 6 months). Dog code section 6.2, RBP (e): Bitches should not be mated so as to whelp and rear litters on consecutive seasons.*

Breeder success

Information is currently being collected within the NZGRA database, for use in the monitoring and evaluation of breeders for evidence of poor performance, including: failure to get dogs through the naming stage (14 months of age); how long dogs race for; % of place getters; and, de registration outcomes. Currently, it is likely that follow-up will be undertaken by NZGRA if two consecutive litters are found to be unsuccessful. However, exactly what follow-up will be undertaken is still being developed.

Effective reduction of unsuccessful breeding is one of a number of critical elements within population management. Whilst noting that this is still an evolving area, NAWAC supports NZGRA in the monitoring and evaluation work which they have developed to date. However, NAWAC would like to emphasise the importance of NZGRA continuing to focus on developing an appropriate and enforceable response to the identification of unsuccessful breeders. Whilst NZGRA has done much to ensure that they have the systems in place to collate and monitor a number of areas, such as breeding success and de registrations, they need to continue to progress with the

implementation of education programmes and systems of follow-up to make sure their expectations are met on the ground. NAWAC will continue to monitor progress within this area.

Breeder Subsidies

All breeding subsidies and sire registration subsidies have now been removed and fees have been introduced for puppy registration, breeder licensing and importation. Revenue is reinvested back into animal welfare, for example: IT work such as database development, track maintenance, development of process, and development of educational initiatives etc.

NAWAC supports the decision to remove breeding subsidies and introduce fees for puppy registration, breeder licensing and importation.

Inherited disorders and identified health issues

NAWAC previously received a copy a paper by Greg Kerr (NZGRA Animal Welfare Manager) on the advantages and disadvantages of selective breeding as part of NAWAC's work on the wider area of animal welfare issues around selective breeding.

NAWAC's current concern lies not in inherited disorders in greyhounds, but in those health issues that are not inherited but are contingent on the specific ways racing greyhounds are raised, kept, and used. For example, attention should be given to concerns relating to aging, including tooth care and gut health.

Greyhound retirement programs

NAWAC fully supports the development of further rehoming and retirement initiatives. NZGRA commented that plans for an initiative called Greyhounds Behind Bars dissolved due to the requirement for significant investment. In the shorter term, NZGRA intend to explore alternatives which require less investment and immediate positive returns to broaden their retirement and rehoming partners; including building new relationships with several other independent greyhound adoption groups such as HUHA.

NAWAC notes that not all dogs will be suitable for rehoming. How greyhounds are raised, socialised and used will impact upon their suitability for rehoming after their racing careers have ended. In their second review, the NZRB reported that in 2014/15 289 dogs entered the Greyhounds as Pets programme, and 274 dogs were processed. 49 dogs were returned due to unsuccessful adoption or change of circumstance of the owner. They also noted NZGRA's eventual target of reaching 400 dog placements per year. The NZGRA informed NAWAC that dogs entering the rehoming programme are assessed as per the Greyhound Victoria model. The NZGRA informed NAWAC that reasons for dogs being returned are often down to circumstance e.g. marriage breakdown, rather than the dogs themselves. Recurring problems of aggression and such like are followed back to the trainer. NAWAC notes that it is important to look into these figures in more detail and report any trends more formally, including reasons for dogs being returned and reasons for dogs being determined as unsuitable for rehoming, so that any possible areas of improvement can be identified. Return rates may be reflective of issues arising as a result of how greyhounds are raised, kept and used (as referred to above).

Rehoming figures are not reported within the database as a proportion measure of rehomed dogs within the whole population of greyhounds ending their racing career at that time. NAWAC recommends that such proportions are reported to provide a clearer picture of how much the Greyhounds as Pets programme is able to contribute to the total number of Greyhounds requiring re-homing at the end of their racing career.

Tier two races vs C1 sprints

In 2014 a new tier of racing was introduced to increase racing opportunities for lower grade dogs, and so reduce the numbers of dogs leaving the industry early. This initiative was not supported by participants as it was a low grade race, lower stake money, and had no TAB betting. Instead C1 races were introduced (full tote and full stake) – resulting in 9 extra races per week and reducing the number of dogs not gaining a start in previous race fields.

NAWAC supports this initiative as another tool by which to control populations of greyhounds leaving the industry early due to a lack of lower grade racing opportunities.

Petrol vouchers

Petrol vouchers had previously been reduced from \$40 down to \$20. The draft 2016/2017 budget presented to the Board included a recommendation that vouchers were reduced to \$0, and the money redistributed back to the participants in the form of stake money. The first cut of this would mean no payment for 7th and 8th place getters so de-incentivising trainers from entering dogs which are clear 7th and 8th performers and instead encouraging the production of higher grade dogs. The further reduction of petrol vouchers (now \$0) was adopted 1st August 2016.

Breaches of standards in the Animal Welfare (Racing Industry Greyhounds) Code of Welfare 2013

The RIU performs an independent policing function on behalf of the NZ Racing Board and three racing codes. Kennel / facility inspections are carried out over a revolving two year cycle (larger trainers and risk kennels where an issue has been reported are inspected more regularly) and measured against specific codes and the Animal Welfare Act 1999. A full audit against every detail of the code is not completed each time. Instead inspections of licensing, facility checks, and specific items of interest are used, with any points of concern triggering a complete audit. A key focus has been to look for signs of live baiting. No issues have been raised to date.

The RIU also operates an 0800 number for anonymous reporting which is also investigated thoroughly.

No formal agreements with the RNZSPCA and RIU have been established to date. However, they do hold a verbal understanding that they will work together and share information where appropriate.

Injury data: Track safety and reducing injuries

In their last recommendations to the Minister, NAWAC noted that although training procedures have not formed a component of the review to date, NZGRA needs to be satisfied that any welfare risks associated with training are identified and addressed. NAWAC considered the Greyhound Racing Welfare Code to be light on guidance for appropriate training procedures, and recommended that: (1) the industry welfare database should provide evidence of any injury problems arising from training; and, (2) the use of aversive training techniques should be monitored.

RIU report on all injury data at every greyhound meeting and input this data straight into the NZGRA database. Information is collated on box positions, age of the dog, area the injury happened, what distance, race number in the race card, track surface readings, type of injury, affected area on the body and outcomes. Information is collected by individual animal and by specific track.

In addition, NZGRA informed NAWAC that they have been collecting self-reported training injury data (both minor and severe) from all trainers since 2014, and can now separate pre-race injury / stand-down's out by a report. If a vet stands a dog down bringing an injury to the track the day is scratched and recoded as such.

NAWAC are content that the correct data is now being collected on track, but notes that post-race injury reporting from trainers is still voluntary. NAWAC again emphasises the importance of ensuring that this information is used to reduce injuries to greyhounds and improve welfare. They note that NZGRA has just completed a series of venue visits (Auckland, Wanganui, and Palmerston North) to look at track quality and maintenance, which have been supported by Greyhound Racing Victoria's track maintenance specialist. A report is being developed based on his observations which should result in safer surfaces and fewer injuries; including comment on watering regimes, track gradient, box alignment, and general condition and suitability of machinery. They also note that an extended hoop arm lure is being trialled – the length of the arm increasing into the middle of the track by approximately 1 metre. The intention is that this will move the dogs off the running rail and reduce the congestion going into the first bend where the majority of collisions occur. Initial trials are favourable, and its use is supported by participants, owners, trainers and club officials.

NZGRA reports that monitoring of aversive training techniques has been very informal to date. Injury data by trainer is used as the indicator - if the NZGRA suspect there might be something in the trainers training methods they send a vet to their facility to observe their methods. This has occurred once to date and the trainer was not found to be of fault.

NAWAC support on-going progress in this area, including sustained or increased effort in ensuring that learnings continue and are resulting in change on the ground.

Organisation and Strategy

NZGRA have been working on a change to the association's governance constitution which would result in more efficient and timely rule change processes; allowing the Board to adopt new rules as required without waiting until an annual AGM.

Population management, track safety and the reduction of injuries, and the expansion of rehoming partnerships remain long terms priorities. Projects to be completed in the next two months are reported as:

- New comprehensive evidence based deregistration certificate
- Local council registration compliance and enforcement
- Total ban on the wire type barking muzzles in race day kennels – NZGRA are not aware of any use of wire type barking muzzles in kennel housing on private premises, but are banning it in race day kennels and will continue to monitor its use on private racing premises.
- Treatment log book per racing facility
- Rule change to our permanently banned substances so we can conduct out of competition hair testing for anabolic steroids in future.

No formal agreements have been established with the New Zealand Veterinary Association, RNZSPCA, MPI or NAWAC.

- It was noted that John Hellstrom would be finishing his term as NAWAC chair at the end of this year. NZGRA expect that NAWAC involvement will continue to be on-going and the database will always be accessible to a member of NAWAC. Also noted that NZGRA would welcome on-going meetings with NAWAC.

- As a result of the independent welfare review, NZGRA established an Independent Welfare Committee to guide and maintain independent oversight of greyhound racing's animal welfare obligations. The chair of this committee is Jim Edwards. This committee meets every 2 months. An RNZSPCA representative (Anja Dale) sits on the welfare committee. NAWAC recommends that a member of the NAWAC secretariat has a seat at the table of this committee as an observer.
- New Zealand Veterinary Association peer review NZGRA systems before their implementation.
- Updates are provided to MPI (current contact: Mark Fisher).

NZGRA are a member of the Animal Welfare and Behaviour Consultative Committee member.

NZGRA are also a member of Greyhounds Australasia Welfare (and are represented on the Board), which are a collaborative group which meet to discuss a number of racing matters, including welfare, such as the implications of rule changes etc. Regularity of these meetings may be impacted upon by the recent banning of greyhound racing in NSW.

Educational Initiatives

The independent welfare review recommended trainers to undertake training assessments and for further work to be undertaken to increase knowledge and awareness of industry participants of welfare minimum standards and best practices. In addition consideration should be given for requiring trainers (new and existing) to complete the training assessments to gain or retain their trainer license. Recommendations further covered a breeding education programme and assessment procedures for registration of breeders; with proactive monitoring and follow-up where unsuccessful litters are whelped.

NZGRA notes that educational initiatives such as the use of training assessments for new trainers were the most challenging to implement, and progress has been interrupted to date by issues outside of their control (e.g. re-structures etc.). The second NZRB review stated that these still require finalisation and implementation. It is important that NZGRA does not lose momentum at the point of monitoring. NAWAC notes the importance of educational initiatives and enforcement in achieving real change on the ground recommends that NZGRA prioritises this area of work.

Concluding comments

As a result of the review and noted above, NAWAC has the following recommendations:

1. NZGRA should work towards achieving best practice in frequency of breeding standards. In particular by requiring that bitches are not mated so as to whelp and rear litters on consecutive seasons, and requiring veterinary advice to be sought before mating bitches of 7 years of age or more.
2. NZGRA prioritisation of the finalisation and implementation of enforcement and educational initiatives undertaken by NZGRA, including the follow-up / education of unsuccessful breeders.
3. NZGRA to report rehoming and euthanasia figures to NAWAC annually and in such a way that the fate of each animal can be clearly identified.
4. Consideration to health issues that are not inherited but are contingent on the specific ways racing greyhounds are raised and kept.
5. NAWAC to continue to engage with NZGRA - a member of the NAWAC secretariat to hold a seat at the table of NZGRA's independent welfare committee as an observer.

NAWAC would like to thank NZGRA for providing open, transparent and frank access to their industry and commends the efforts that they continue to make to improve the welfare of the animals they use in their sport.

Sincerely

A handwritten signature in blue ink, appearing to read 'John Hellström', with a stylized flourish at the end.

John Hellström
Chair, National Animal Welfare Advisory Committee