



National Animal Welfare Advisory Committee

27 July 2023

Hon Jo Luxton
Associate Minister of Agriculture
Parliament Buildings
Wellington 6160

Tēnā koe Minister Luxton

Greyhound Update

I am writing to you on behalf of the National Animal Welfare Advisory Committee (NAWAC) regarding the greyhound racing review work programme. NAWAC's greyhound subcommittee has reviewed the reports (dated 12 December 2022 and 16 March 2023) from the Racing Integrity Board (RIB) that were released by the Minister for Racing, Hon Kieran McAnulty, in late May 2023.

In addition to feedback on RIB's reports, you have asked NAWAC to consider:

- Any changes required if greyhound racing were to continue; and
- Any necessary requirements if greyhound racing was banned with a 2-year transition period in regards to ensuring animal welfare outcomes of greyhounds.

We commend the RIB for the development and oversight of the 15-month work programme in conjunction with Greyhound Racing New Zealand (GRNZ) to help resolve issues identified in the Robertson, Hansen, and WHK Reports. We are mindful however, that without RIB resources and involvement, progress by GRNZ may not have been made on many of the key issues, if at all. We believe that GRNZ has been very slow in its commitment to improved animal welfare. If the greyhound industry is allowed to continue and RIB is unable to provide ongoing oversight, which they have indicated will involve considerable resource, NAWAC has concerns that work to continue implementing animal welfare improvements may wane. We therefore recommend continued reporting by GRNZ to relevant Ministers, as well as continued reporting by the RIB on kennel audits and race day welfare issues, including the use of unauthorised drugs, track injuries, and euthanasias.

NAWAC would ask that you note the following points in relation to animal welfare, in the December and March reports:

- We have always considered the population management model as a valuable tool in managing the greyhound population and are pleased that the RIB model has now been handed over to GRNZ to manage. GRNZ appointing an experienced full-time population analyst to manage the model signals the industry's commitment to making informed decisions that impact greyhounds from breeding to rehoming. We support RIB's recommendations for population management — in particular that animal welfare should be at the forefront of decision making.
- We acknowledge that a multitude of factors (e.g., greyhound fitness, racing incidents, track design and maintenance) contribute to race day injuries but are concerned that the injury rate continues to trend upwards. We share RIB's view that GRNZ has been slow to respond to track safety concerns. We support the Serious Injuries Review Committee (SIRC) and their work to identify risk factors and determine appropriate injury prevention and reduction strategies. It is pleasing to learn that SIRC's recommendations have resulted in GRNZ developing some new rules and has informed the development of the Injury Reduction Strategy. We consider that non-reporting of injuries outside of race days needs to be urgently addressed for transparency and to provide an accurate picture of all injuries across the industry.

- We acknowledge GRNZ for adopting a euthanasia policy that does not allow for the routine euthanasia of healthy greyhounds, including registered greyhounds and retired greyhounds kept as pets by licensed persons and puppies. We are pleased to see euthanasia rates of greyhounds sustaining serious injuries on race day declining and surgery/rehabilitation rates increasing because of the GRNZ paid Rehabilitate to Rehome programme but note this must not be at the expense of the welfare of individual animals. Euthanasia at the track for example, or following clinical assessment, must remain an option for dogs injured during racing, if it avoids welfare compromise or ongoing suffering. We are concerned that a provision in the Rehabilitate to Rehome programme that allows rehabilitating greyhounds to return to racing while awaiting adoption puts those dogs at high risk of injury again and is not a suitable option for these dogs. It is not clear to us whether this policy decision has arisen from the difficulties currently being experienced in trying to rehome retired greyhounds.
- We remain concerned with the level of injuries sustained to greyhounds despite implementation of track safety initiatives. We acknowledge GRNZ for recognising that track construction, design and maintenance is key to reducing injury counts and are pleased that a new Racing Safety and Infrastructure Manager has been employed to provide technical expertise in this area. We believe GRNZ should extend Preferred Box Draws to all races and prioritise investment in straight tracks.
- We acknowledge GRNZ for its efforts and investment into progressing greyhound rehoming initiatives and note that this has become more challenging considering the impacts of COVID-19 and the cost of living crisis. In relation to requirements for deregistered greyhounds, we support all greyhounds receiving a health check, dental treatment, and being desexed prior to adoption. We are also pleased to learn that the new Greyhound Welfare Standards will require every person taking care of greyhounds to produce an Exercise, Socialisation, and Enrichment (ESE) plan for their premises for all the different life cycle stages of the greyhounds they care for. Puppies that are well socialised and dogs that are given the opportunity to interact with other dogs daily are less likely to develop behavioural problems and as such should be easier to rehome at the end of their racing career and will adapt more easily from a kennel to a home environment. While an ESE plan is a promising first step, it is not clear how kennel audits will be able to determine if these plans have been successfully implemented across the lifetime of the greyhound. Further to this, the RIB has stated that the GRNZ Animal Health & Welfare Standards are not widely understood across the industry.
- We commend the work undertaken by RIB in carrying out the 2022 kennel audits which assessed a range of measures including facilities, greyhound health, and traceability. We are pleased that most greyhounds met the health check requirements for body condition and dental health. We acknowledge GRNZ for dealing with low rates of vaccinations for racing greyhounds by covering the costs of these, and are pleased to learn that the revised Greyhound Welfare Standards will cover vaccinations for non-racing greyhounds. We welcome the news that all kennels must meet or exceed size standards for large dogs as outlined in the 2018 dogs code of welfare until such time as existing kennels comply with minimum size requirements specified in the new Greyhound Welfare Standards.
- We have always advocated that industry, as part of its overall welfare assurance programme, set key performance indicators (KPIs) against which the direction of its performance can be measured. We are pleased to learn that GRNZ's KPIs and targets are now in place and that key focus areas include animal welfare.
- We note that the supplementary report only allowed RIB to access publicly available information about other industry closures to determine a possible closure strategy for GRNZ.
- We agree that the range of metrics likely to be relevant to any decision about the future of the industry include race meeting schedules, the number of licensed persons and staff involved, greyhound population numbers, and adoption rates.
- We acknowledge the pros and cons of both a short transition period (e.g., 12 months) and a longer transition period (e.g., 24 months) outlined in the RIB supplementary report. We note that the report identifies the shorter transition time having potentially less negative welfare impacts on greyhounds and that while greyhound racing occurs, injuries will continue.
- We further note that the RIB supplementary report is not exhaustive and further work would be required to develop a full closure strategy and detailed plan. We believe stakeholder support from rehoming agencies such as the SPCA will be critical to the success of any plan to close the industry. Managing the racing population of dogs through exports or rehoming will be very challenging. There are no legal constraints under the Animal Welfare Act 1999 or other legislation on an owners' decisions regarding euthanasia of their animals, neither dogs nor any other species. The full closure strategy would remove imperatives for owners to comply with GRNZ policies. The closure strategy would, therefore, need to replace the effect of those industry policies with other mechanisms to mitigate the risk of large scale euthanasia and

instead replace it with a one-off multi-agency greyhound adoption campaign. This has been a successful initiative in other countries where the greyhound industry has closed. We understand animal welfare agencies have already started work in this regard in preparation if the industry is closed.

- Of concern is that while there is uncertainty in the industry, kennel and track upgrades will likely be deferred putting the welfare of greyhounds at risk.
- Irrespective of what decision Cabinet makes on the future of greyhound racing, strong leadership, planning, and monitoring across the sector will be required to safeguard animal welfare.

Finally, we note that GRNZ has continued to implement animal welfare improvements that are not necessarily covered in the December 2022 RIB report. This includes the introduction of new racing rules, new greyhound welfare standards, implementation of a track diagnostic programme, and compulsory education for licensed persons. NAWAC sits on the GRNZ Animal Health and Welfare Committee (AHWC) as an observer and it is through this mechanism that we monitor industry progress against review recommendations in order to provide you with advice.

Should you wish to discuss this letter, or any other issue, you can reach me by phone on 9(2)(a) [REDACTED]

Ngā mihi,



Dr Matthew Stone
Chair, National Animal Welfare Advisory Committee

CC: Hon Kieran McAnulty
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