

National Animal Welfare Advisory Committee ion Act 1982 (OIA

1st April 2019

Hon Damien O'Connor Minister of Agriculture **Parliament Buildings** Wellington 6140

Dear Minister O'Connor,

NAWAC advice on industry progress with the Hansen Report on Greyhound Racing

You referred to NAWAC the Fourth Hansen Report Update, and an annual update, outlining the New Zealand Greyhound Racing Association's (NZGRA) progress in meeting the 20 recommendations put forward in the Hansen Report.

I have provided some background on NAWAC's involvement in monitoring the welfare concerns around greyhound racing in recent years, in addition to NAWAC's comments on the annual update.

Overall, the Committee is comfortable with progress, but we are concerned about overpopulation and euthanasia rates, track injuries, and socialisation of greyhounds as pets. We make recommendations on these points below.

Background

1. In 2013, following a campaign from the Greyhound Protection League, the New Zealand Greyhound Racing Association (NZGRA) commissioned an independent review into the welfare of racing greyhounds and how the industry could improve its welfare practices. The report was prepared by WHK New Zealand Audit and Assurance and presented 36 recommendations to ensure the welfare of racing greyhounds in New Zealand. These covered issues such as:

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- a lack of enforcement and awareness of welfare standards, leading to a culture of noncompliance;
- inadequate tracing 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.
- 2. One outcome of the review was the establishment of an independent animal welfare committee, integrated within the industry's governance structure, to guide and maintain independent oversight of NZGRA's animal welfare obligations. A representative of NAWAC has attended NZGRA welfare committee meetings as an observer since October 2016, offering an effective mechanism by which NAWAC can monitor the progress of the industry.
- 3. NAWAC has provided advice to the previous Minister responsible for animal welfare on a number of occasions. In general NAWAC has been satisfied that NZGRA have made a strong commitment to resolving identified welfare issues and progress has been made. In previous advice, over-population and euthanasia rates were indicated as the greatest remaining concerns. In addition to continued work on tracing greyhounds, modelling population dynamics, and increasing racing opportunities, NAWAC considered it imperative that initiatives to improve the chances of dogs being successfully re-homed following their racing careers commenced as soon as possible.
- 4. On the 22 November 2016, the NZRB announced a new inquiry to review the systems and processes relating to the breeding, racing and life cycle tracing of greyhounds bred in New Zealand and imported into New Zealand, as well as best practice to be followed in the management of the retirement of greyhounds. The inquiry was undertaken by retired High Court Judge Rod Hansen QC, and resulted in 20 recommendations. NAWAC reported to the previous Minister in December 2017 that it was supportive of all of the recommendations and agreed that they would further advance the welfare of greyhounds.
- 5. s 9(2)(a) , Head of Animal Welfare at NZGRA, attended NAWAC's meeting on 13th February 2019 to provide an update on progress of the industry with the Hansen report recommendations.

Comment on progress to date and recommendations for improvement

6. The 20 Hansen Report recommendations can be grouped into four general areas: Animal Health and Welfare, Registry and Database, Animal Traciing and Registration, and Track Safety. NZGRA report that they have completed seven of the recommendations, are

scoping one, and the remaining twelve are in progress.

- 7. From the update provided by \$9(2)(a) , and attendance as an observer at the NZGRA welfare committee, NAWAC is generally happy with the report and work progressed to date to meet the targets set, and commends the NZGRA on this progress.
- 8. Noting that NZGRA have expressed it will be a 2-3 year work programme to deliver on all recommendations, NAWAC expects to see this progress continue and has provided specific comment against each recommendation in Appendix 1.
- 9. Overpopulation and euthanasia rates remain concerns. NAWAC would like to emphasise that there is still progress which can be made in a number of key areas, including:
 - reducing track injuries, however noting that the development and testing of
 initiatives such as a new lure-arm system which is now being implemented across all
 tracks shows promise in this area;
 - ensuring adequate socialisation of greyhounds, noting that the way in which
 greyhounds are raised, socialised and used will impact upon both their welfare
 during their racing career and their suitability for rehoming after their racing careers
 have ended, however noting that the industry is currently working to develop
 strategies and methods for this; and,
 - population modelling to predict future animal requirements and thus decrease the number of excess dogs within the industry.
- 10. NAWAC would also like to see further development in the education and qualifications set around standards within the industry.
- 11. NAWAC will continue to monitor progress through attending NZGRA welfare committee meetings, and has encouraged the committee to formally incorporate the outstanding Hansen recommendations within their on-going work programme where appropriate.

Additional Information

12. Outside of progress with the Hansen report, NAWAC would also like to comment on a humber of issues which are relevant to NZGRA and greyhound welfare.

Messara Report into the New Zealand Racing Industry

NAWAC is aware of the Messara Report released in August 2018. This report is a high level review of the New Zealand Racing Industry, with a focus on the thoroughbred racing sector. However, some of the recommendations are likely to have an impact on NZGRA, including:

- a proposed review of the efficacy, independence and accountability of the present integrity model across the three codes (thoroughbred, harness and greyhound racing); and,
- 1982 (OIA • the introduction of processes to ensure traceability within the entire thoroughbred herd. On this point, we note that NZGRA have been also been developing their traceability processes and have conducted an audit of all kennels which has assisted in identifying many dogs that were previously unaccounted for.

NAWAC will monitor the impact of these recommendations on greyhound welfare.

Cook Strait Ferry Deaths

Five greyhounds died after being left in a hot vehicle during a Cook Strait ferry crossing in January this year. This matter has been dealt with by the Racing Integrity Unit (responsible for managing integrity issues within the industry) and NAWAC understands that it remains an ongoing investigation by the SPCA. NAWAC notes that this is an issue which is not specific to greyhounds, with other dogs unrelated to the greyhound industry also dying in this manner in February. The NZGRA welfare committee is working to improve communications with their industry members around what to do when transporting dogs by ferry, and intends to contact the ferry operators to ensure they fully understand the process from their side.

Research Projects

NZGRA has commissioned a piece of research investigating blindness and the association with parasites in greyhounds. A number of greyhounds presented for rehoming have been shown to be blind. While blindness may have several causes, it is well recognised that a major cause in dogs and other species including humans may be the result of the migration of worms through the retina. The study will investigate the number of dogs affected, why the problem is occurring, and to determine if the parasites have become resistant to drugs currently available for treatment. The study is due to be completed August 2019 and NAWAC will review the findings.

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Governance

NAWAC notes that establishment of the NZGRA welfare committee was a positive step and has found attending the meetings as an observer of great value. However, NAWAC wants to ensure that the work and recommendations of the committee are being recognised and taken into consideration during final decisions by the NZGRA board. Steps made by NZGRA to ensure this have included the formalisation of Chief Executive responsibilities to include greyhound welfare. The Chief Executive of NZGRA has started to attend welfare committee meetings, and the Chair of the NZGRA welfare committee intends to attend a number of board meetings per year which will improve the governance linkages. NAWAC will continue to monitor how this is working.

NAWACs review of animals used for entertainment, exhibition and encounter

As you are aware, NAWAC's current work plan includes a review of animals used for entertainment, exhibition and encounter (the 3 E's). NAWAC will look to draft an opinion piece which establishes principles that owners and/or persons in charge of animals being used for these purposes should consider.

Within the opinion piece, NAWAC aims to discuss how to balance the various welfare costs to animals used in exhibition, entertainment and encounter against the perceived societal values of these activities, acknowledging that these debates broach broader ethical questions than the committee has previously considered. In order to achieve this, NAWAC are holding a workshop on the 23rd May to develop a 'societal value framework'. NAWAC is seeking input from experts in bioethics to participate in the workshop.

Following the workshop NAWAC will seek stakeholder feedback through consultation whilst drafting the opinion piece. NZGRA will be involved at this stage.

Proactively Released under the Official Information Act, 1982 (OIA) Again, NAWAC congratulates the NZGRA on the progress to date and should you wish to discuss this letter, or any other issue, you can reach me by phone on \$ 9(2)(a)

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Appendix 1 NAWAC Comments by Hansen Report Recommendation

Overall animal health and welfare

Recommendation 01: Introduce New Health and Welfare Standards

The Health and Welfare Standards currently under consideration by NZGRA should be finalised and made binding on members as soon as is practically possible. They should include provision for best practice standards for the socialisation and habituation of greyhounds.

Year 1 Status

The new NZGRA Health and Welfare Standards were distributed to Licensed Persons in June 2018 and were in place from 1 August 2018, with an accompanying education campaign. These standards have been enforced since 1 February 2019.

NAWAC comment

NAWAC has previously reported that it considers it critical that the standards around socialisation and habituation of greyhounds are both included and that sufficient time is taken to ensure that these are correct. The way in which greyhounds are raised, socialised and used will impact upon their suitability for rehoming after their racing careers have ended.

NAWAC supports the introduction of health and welfare standards and will be following the impact of their enforcement. NAWAC notes that NZGRA are working to introduce a socialisation policy this year to support the standard in this area. NAWAC has had input into this policy through its role as observer on the welfare committee. The policy will provide more detail around what the specific requirements are around this standard. NAWAC considers it is imperative that these requirements can be effectively delivered on the ground and will be monitoring progress in this area; including how the requirements are received by licensed persons. One particular aspect is ensuring that the socialisation policy is practically scalable across the varying sizes of greyhound facilities, whilst remaining effective. NAWAC notes that NZGRA have established a licensed persons' advisory group through which to truthtest policies such as this one.

The new Animal Welfare (Care and Procedures) regulations 2018 include a regulation pertaining to the use of muzzles on dogs; ensuring that muzzles do not cause injury or prevent the dog from breathing normally, panting, drinking or vomiting. This is now also reflected in the NZGRA health and welfare standard, which also precludes the use of all muzzles other than basket muzzles; with one exception for therapeutic use. NAWAC notes that there is some dissatisfaction with this standard from licensed persons who would prefer to use more

restrictive barking muzzles on race day during kennelling, to stop the dogs barking and so conserve energy. NAWAC supports the standards as they are currently and understands that MPI and the SPCA are working with NZGRA to ensure education of, and compliance within, their members. Use of barking muzzles to attempt to reduce the greyhound's energy expenditure prior to racing cannot be justified on animal welfare grounds. Their use fails to recognise that the greyhound may experience increased distress by restricting its ability to perform a behaviour that may be a coping mechanism within a stressful situation such as confinement in a kennel prior to a race.

Recommendation 02: Implement Annual RIU Kennel Inspections

All kennels used for breeding, rearing and training greyhounds for racing should be inspected by the RIU at least once a year.

Year 1 Status

- Agreement has been reached with the RIU and annual inspections will be undertaken, including microchip scanning of all greyhounds on the property.
- In addition, a new kennel inspection process is to be developed; and will now be confirmed once we know the outcomes from a review of the RIU, as part of the Massara Report recommendations.

NAWAC comment

NAWAC supports at least annual inspections. Without enforcement, the introduction of standards can only improve welfare so far.

Recommendation 03: Education and Awareness of New Welfare Standards

NZGRA should continue to encourage and facilitate training assessments and to publish educational materials for trainers with particular emphasis on generating awareness of the new welfare standards.

- An education campaign for all new health and welfare standards was completed in October 2018. This included workshops, articles and other educational material being distributed to LPs.
- Additional campaigns will follow to always keep education and awareness up to date.

- Additionally, we have contracted QED Associates to undertake a scoping project to develop an overarching training and education program with qualifications that link to all licencing (e.g. Handler, Breeder, Trainer).

NAWAC comment

NAWAC supports progress to date, and will be following progression with the development of qualifications.

Recommendation 04: Vaccinations

Steps should be taken to ensure that the vaccinations of greyhounds remain current by requiring proof of vaccinations on registration for naming and thereafter annually and/or as a condition of permission to race.

Year 1 Status

- The new NZGRA Vaccination Policy was approved and communicated to Licensed Persons prior to being put in place 1 August 2018.
- The process and vaccination books are to be released May 2019. This provides LPs time to get all vaccinations up-to-date before enforcement from 1 August, when vaccinations will be a criteria to register a litter and to nominate to race.

NAWAC comment

NAWAC supports progress to date.

Recommendation 05: Ameliorate Ear Branding

The NZGRA should consider whether it is necessary for ear branding to continue and, if it is, to require ear branding to be done under local anaesthetic or otherwise so as not to cause pain to puppies.

- Solution needs to be agreed by Greyhounds Australasia and meet integrity requirements around identification. We have begun these discussions.
- In the interim, topical anaesthetic cream has been distributed to ear branders for use on all puppies since 1 October 2018.

NAWAC comment

NAWAC supports the introduction of topical anaesthetic but would still like to see the use of ear branding phased out as other alternatives become feasible.

> Recommendation 19: Veterinary Care Database

NZGRA should give effect to the recommendation in the WHK report to record the veterinary care of all greyhounds in a central database.

Year 1 Status

- Post race injury reporting rule in place as of 1 August 2018.
- A new platform for recording and accessing vaccination details for each greyhound is currently under development and will be in place August 2019.
- A centralised database is difficult to achieve, as discussed with NZVA, due to the inability to share information regarding individual animals across veterinary clinics nationwide.
- We will continue to build on our database to include more information regarding individual greyhound health status.

NAWAC comment

NAWAC notes that the lack of a centralised veterinary database is an issue of wider relevance than just for greyhounds. NAWAC notes that the development of such a database by the Equine Health Association has been piloted, and would encourage similar developments across all industries as a means to improve information systems.

Registry and database

Recommendation 06: Breeding Register

The NZGRA should introduce a rule change to establish a separate register of breeding bitches, to require registration of a brood bitch prior to service and for deregistration on ceasing to be used for breeding purposes.

- A new breeding female registry has been established.
- The new NZGRA Registering a Breeding Female Policy has been in place since 1
 August outlining the new regulations regarding number of litters, age of female and

other criteria that needs to be met to register and breed a litter (eg up-to-date vaccinations and health checks).

NAWAC comment

NAWAC supports progress to date.

Recommendation 07: Database Revamp

The NZGRA should take steps to ensure that its database is revamped so as to ensure that upto-date, easily accessible and accurate information is available on every greyhound born in New Zealand or imported into New Zealand until it is deregistered.

Year 1 Status

- An IT specialist was employed to project manage database improvements in April 2018.
- Welfare enhancements in the database to date include the breeding female registry, recording of service and whelping information, and new de-registration processes.
 We also completed implementing a system that automatically checks that each LP has the correct licences for the activity (e.g. breeding) in which they want to participate.
- Current developments either being scoped or underway include:
- A new tracking system that automatically alerts us to greyhounds that have not raced recently and puppies registered but not raced that may need to be deregistered.
- A new platform for recording vaccination details of individual greyhounds.
- A wider, larger database project that is in the first stages that moves the database to a web-based system, and includes improved data input and management processes and procedures.

NAWAC comment

NAWAC sees database improvements as critical to ensure transparency within the industry. Progress made to date will greatly assist in the tracking of greyhounds throughout their racing career. NAWAC would also like to see the reporting output of the database improved – so that information such as statistics on injuries and associated factors are readily available.

> Recommendation 08: Database Accuracy / Unaccounted for Dogs

The NZGRA should verify the accuracy of its database by:

- a. Making provision for the RIU to report on the dogs present in each kennel in the course of annual kennel inspections and by updating its database accordingly;
- b. Requiring trainers to provide a return of all dogs in their kennels when relicensing;
- c. Agreeing that thereafter the RIU audit the dogs recorded as present in kennels at the time of its annual inspection.

Year 1 Status

- The RIU completed a nationwide census, microchip scanning all greyhounds on LP properties.
- Re-licensing forms include a declaration of the number of greyhounds on the property.
- The annual process of kennel inspections will also include a report on greyhounds present at each kennel.
- 89% of 1,271 greyhounds reported as 'missing' in the database are now accounted for. A breakdown of these numbers was presented in the Fourth Quarterly Hansen Update.
- 11% of the 1,271 greyhounds were unable to be accounted for due to incomplete information received from the LP or some LPs being uncontactable.

NAWAC comment

As above. Plus, NAWAC is satisfied that NZGRA have made positive steps in their attempts to identify the remaining 135 unaccounted for dogs. Going forwards NAWAC expects it would be unlikely for this same problem to occur again given the initiatives NZGRA are putting in place.

Recommendation 09: Audits of Privately Rehomed Greyhounds

The recommendation of WHK that audits of greyhounds registered as privately rehomed should be performed to verify their whereabouts should be acted on.

- Database enhancements around new de-registration processes now enable the capture of private rehoming information.
- Every new owner adopting a greyhound through private rehoming is now called for verification.

- All greyhounds privately rehomed have been followed up on since this was put in place August 2018.

NAWAC comment

NAWAC supports progress to date.

> Recommendation 11: Registration of Greyhounds with Territorial Authority

NZGRA should take steps to ensure that greyhound owners comply with their obligations under the general law including by requiring proof of registration with a territorial authority as a condition of registration for naming and checks on race day to ensure that registration is up to date.

Year 1 Status

- We have formally requested the reclassification of greyhounds as a working dog as part of creating a National Register. We have done this with the responsible Minister and the Ministerial Advisory Committee overseeing the Messara Report.
- We are awaiting the outcome of these change requests.
- If these requests are unsuccessful, then we will be faced with undertaking a local authority by local authority process.

NAWAC comment

NAWAC will continue to monitor progress in this area.

Track Safety

Recommendation 17: Reporting of euthanasia at racetracks.

NZGRA should remove restrictions on the inclusion in the steward's report of information relating to euthanasia at racetracks.

Year 1 Status

In place from December 2017.

NAWAC comment

NAWAC supports progress to date.

> Recommendation 18: Injury Reporting outside the Racetrack

Trainers should be required to report injuries to greyhounds that occur or are detected outside the racetrack.

Year 1 Status

- The post-race injury reporting rule was put in place as of 1 August 2018.
- Systems have been updated in the database to allow recording of post-race injuries
- An education campaign will be undertaken to ensure compliance.

NAWAC comment

NAWAC supports progress to date. NAWAC notes that whilst a record of injuries to greyhounds that occur or are detected outside the racetrack is important, it will always be based on self-report and so should be interpreted in this light.

Recommendation 20: Track Safety Initiatives

NZGRA should continue with its program of improving safety at racetracks including:

- a. Undertaking or promoting further research into the causes of death and injury including into possible explanations for differences in casualty rates between race tracks
- b. The completion of trials on the positioning of the lure and giving effect to any changes recommended as a result.
- c. Investigating the introduction of straight tracks.

- Injury trends are being monitored track by track.
- Expert track inspections were undertaken in October 2018.
- A track design and injury prevention workshop was held at our Annual Conference in October 2018.
 - We are funding a Massey PhD student to investigate risk factors related to track injuries, including frequency of racing.
- Research results reported reduced injuries using an extended lure arm, therefore the extended arm is being introduced at Addington in February 2019 prior to further roll out across all tracks.
- Research results reported reduced congestion and reduced on track euthanisia rates with 6 dog fields, therefore 6 dog field trials will be undertaken in February 2019 at Addington.

- Trials at our Manawatu track, where the 375m start was moved to a 410m start, resulted in a decrease in injuries and is now the new permanent sprint distance for Manawatu.
- Analysis of injury rates at straight tracks in Australia will determine opportunities in NZ.

NAWAC comment

Track injuries continue to be an area of concern. The recommendation to continue to focus on a reduction in this area remains pertinent and a programme of work and efforts to improve safety and lower injury rate must be continued. NAWAC notes that a number of improvements are being introduced, including the hoop lure arm and changes to the position of starting gates — and will continue to monitor progress. NAWAC is aware that NZGRA intends to progress one change at a time in order to measure impact. NAWAC also notes that changes to the make-up of a race e.g. trials of 6 dog field days, will be balanced against other racing industry considerations, including betting turnover etc.

The Massey PhD student work - Training, Racing and Career Longevity of Racing Greyhounds - is due to be completed across three years. NAWAC anticipates that finding from this research will be incorporated into the programme of work undertaken by the NZGRA welfare committee.

Dog tracking, de-registration and euthanasia

> Recommendation 10: De-sexing at deregistration

NZGRA should give consideration to requiring the de-sexing of greyhounds as a condition of deregistration.

Year 1 Status

- It is already a requirement for a greyhound to be desexed when going through NZGRA rehoming partners.
 - We are scoping options to enable the ease and implementation of desexing all privately rehomed greyhounds.
- The introduction of this policy will be aligned with our new rehoming framework, as we will have more control over the rehoming process for all greyhounds.

NAWAC comment

NAWAC supports the recommendation around de-sexing and would like to see a policy introduced to enable it.

> Recommendation 12 Tracking of Greyhounds

NZGRA should ensure that from registration as a puppy or following importation into New Zealand until deregistration every greyhound is tracked in its database. This will include:

- a. Making clear, if need be by a rule change, that the obligation to deregister applies to every greyhound, not just those registered for naming.
- b. Introducing a rule change to ensure that a registered greyhound is at all times kept in licensed premises in the care and control of a licensed person.
- c. Rigorously monitoring compliance with registration and deregistration obligations including by follow-up action when non- compliance is suspected and by the checks to be undertaken in the course of kennel inspections.

Year 1 Status

- A comprehensive series of communications were undertaken with Licensed Persons educating them in regards to de-registration obligations and rules including puppies, unraced greyhounds and greyhounds they keep as pets.
- A new rule requiring all greyhounds to be in the care and on the premises of a LP has been passed and was effective as of 1 August 2018.
- We have planned database improvements to introduce an automated alert for greyhounds not raced for a determined period of time and any puppies not registered to race once they reach racing age for follow up, which will be put in place in the 2019/20 season.

NAWAC comment

Within previous advice to the Minister, NAWAC stressed the importance of tracking all greyhounds from birth until point of de-registration. NAWAC supports all initiatives needed to ensure this is carried out. Notwithstanding that NAWAC appreciates that NZGRA obligations are to animals that are racing or intended to race, NAWAC would like a compulsory death certification process for all greyhounds that have been in the registration system so that post-career information can also be gathered accurately and transparently.

Recommendation 13: Euthanasia approval.

NZGRA should introduce a rule change to require approval before a dog is euthanised. This will include an assessment of whether the animal is suitable for rehoming.

Year 1 Status

- We have passed a rule that allows NZGRA to establish a policy on euthanasia pre-
- 3n Act 1982 (01A - The introduction of this policy will be aligned with our new rehoming framework, as we will have increased capacity and more control over the rehoming process for all greyhounds.

NAWAC comment

NAWAC supports the introduction of this policy.

Recommendation 14: Racing Opportunities

The NZGRA should continue efforts to expand racing opportunities and extend the racing careers of greyhounds.

Year 1 Status

- There were an extra 303 C1 sprint races in the 2016/17 season and an extra 529 races in 2018/19.
- Collaborations with Australia on track improvements and new initiatives, including analysis of straight tracks, will continue and will determine the best options for NZ.

NAWAC comment

NAWAC supports progress to date.

Recommendation 15: Increase Rehoming

NZGRA should continue to increase rehoming opportunities for greyhounds while recognising that rehoming alone cannot solve the problems created by excessive numbers of greyhounds entering the industry each year.

- We increased rehoming funding by 60% in the 2017/18 season.
- Our Levin property upgrade is in the final stage of completion and has increased capacity to 60 kennels, allowing us to gradually build up to housing this number of retired greyhounds for adoption.
- The framework for our new rehoming program nationwide is well underway. We aim to have the new model in place in the 2019/2020 season.

Great Mates Prison Program successfully trialled at Rimutaka Prison and is now a permanent program. Discussions to extend the program to other prisons is underway.

NAWAC comment

NAWAC supports the introduction of a rehoming manager and is encouraged by the success of programmes such as Great Mates.

Recommendation 16: Industry Capacity

NZGRA should continue to develop the means of making accurate projections of future requirements for greyhounds and by education or, if necessary, regulation ensure that the numbers of greyhounds bred and/or imported do not exceed the requirements of the industry having regard to the capacity to rehome greyhounds who do not race or cease racing.

Year 1 Status

- A modelling tool has been developed and ongoing refinements will be made to it.
- We have a cap of 20 greyhounds (max five per training facility) per month that can be imported into NZ.
- We have conducted meetings withour large breeders to discuss reducing the number of litters.
- Our new Health and Welfare Standards include a reduction in litters a breeding female can have from seven to three, and a reduction in the maximum age they can be bred from eight to six years of age.

NAWAC comment

NAWAC remains aware of the risk of saturation in the demand for rehoming greyhounds. A number of initiatives have commenced with the aim of decreasing the number of excess dogs within the industry, including: the use of population modelling to predict numbers of dogs; increasing racing opportunities for all dogs; and, expanding rehoming options. NAWAC considers it imperative that a balanced population is achieved; with the number of dogs bred, or imported, not exceeding the requirements of the industry. Current rehoming options are likely to be insufficient and a greater focus on this area as a whole is needed.

NAWAC has requested a demonstration of the population modelling tool to determine its possible impact.