



National Animal Welfare Advisory Committee

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CC: Associate Minister of Agriculture; Minister of Racing

Feedback to support the independent review of greyhound racing and greyhound welfare in New Zealand

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Introduction

- The National Animal Welfare Advisory Committee (NAWAC) welcomes the opportunity to provide input to support the review of greyhound welfare.
- NAWAC is an independent statutory committee established under the Animal Welfare Act 1999 to advise the Minister responsible for animal welfare on animal welfare matters. Its functions include recommending codes of welfare for issue and making recommendations on legislative proposals including regulations.
- Greyhound racing has been subject to public scrutiny for a number of years, with particular concern over injury and euthanasia rates. A member of NAWAC's secretariat team within MPI sits on the Greyhound Racing New Zealand (GRNZ) Welfare Committee as an observer. Through this mechanism NAWAC monitors industry progress against recommendations from the Hansen report and provides the Minister responsible for animal welfare with its advice.
- The Animal Welfare Act 1999 and several [codes of welfare](#), including the codes of welfare for dogs, transport, and temporary housing, apply to owners and people in charge of greyhounds in New Zealand.
- NAWAC is working on a report that will set out the Committee's opinion on the ethical use of animals in entertainment, including a series of principles that should be considered alongside a welfare assessment when deciding if and how animals should be used in entertainment.

NAWAC's work on greyhound welfare to date

- In October 2017, Rodney Hansen CNZM QC delivered a report on the state of Animal Welfare standards as they then applied to the industry in New Zealand ('the Hansen Report'). The report was commissioned by the New Zealand Racing Board and intended to assist both the Board and GRNZ in assessing progress in the industry and opportunities for improvement. The report contained 20 recommendations in the areas of Animal Health and Welfare, Registry and Database, Animal Tracking and Registration, and Track Safety.
- GRNZ provided quarterly progress reports to the Minister of Racing and the Minister responsible for animal welfare from May 2018 until May 2020. This was coordinated by GRNZ's first Head of Welfare, a position that has since been disestablished.
- NAWAC has, in the past, been supportive of the progress made by GRNZ against the Hansen report recommendations. NAWAC found the early progress of the industry to be promising.
- However, in advice starting from 2019, NAWAC did begin to note that improvement was still needed. NAWAC's concerns related particularly to population modelling, socialisation of greyhounds as pets, and injury rates. NAWAC found that while there was reportedly work being done on a number of initiatives – including a new database - there was a lack of data being reported to show how these initiatives were making a difference to greyhounds (e.g. number of raceday injuries, number of animals euthanised, numbers of puppies whelped, etc.). In addition, there appeared to be a lack of cohesion between the outcomes from the welfare committee and final decision making by the board.
- Many of NAWAC's historical reports are available online (see the reports & reviews section): <https://www.mpi.govt.nz/protection-and-response/animal-welfare/national-animal-welfare-advisory-committee>.
- At a meeting on 24 July 2020, GRNZ confirmed to the welfare committee that the reporting on the Hansen recommendations would cease. The NAWAC observer noted that the information provided to the welfare committee was insufficient to determine whether the recommendations had been adequately met. Following this meeting, the NAWAC chair spoke to the independent Chair of the welfare committee directly about reporting and the type of information required by NAWAC.
- In August 2020 (in advice that is not yet online), NAWAC advised Minister O'Connor that the final quarterly update provided by GRNZ against the Hansen report recommendations was insufficient to clearly ascertain if each of the Hansen report recommendations have been met. NAWAC was unable to support the proposed cessation of reporting.
- At a welfare committee meeting on 30 November 2020 the NAWAC observer noted that without additional information on the Hansen report progress, NAWAC was unable to provide the Minister with more comprehensive advice on whether the recommendations have been satisfactorily implemented.
- Following NAWAC's advice, Minister Whaitiri wrote to GRNZ in December 2020 to request the continuation of reporting. On 23 December GRNZ responded to confirm that reporting would not continue.
- No further meetings of the greyhound welfare committee have been held since 30 November 2020.

Comments on the Terms of Reference

- How Greyhound Racing New Zealand has progressed towards or met each of the recommendations from the two independent reviews:
 - As advised to Minister O'Connor in August 2020, NAWAC has reviewed the last Hansen report update provided by GRNZ (dated 18 June 2020) and considers that the information it provides is insufficient to clearly ascertain if each of the Hansen report recommendations have been met.
 - For example, the update provided for Recommendation 20 (safety at racetracks) states "PhD student engaged, extended arm lure in place at Addington, sprint boxes redesigned in Palmerston North, Track Advisor appointed, and taking delivery of new Racetrack Groomers."
 - While these are good initiatives, NAWAC considers that in order to close off reporting and consider the Hansen report "complete", data would need to be provided showing how this work has led to a reduction in track injuries for greyhounds. This goes for each recommendation: the reporting should provide specific data wherever possible, and always relate back to how the activities undertaken have improved the welfare of the dogs involved.
 - NAWAC therefore supports this independent review as a way to determine whether the recommendations have been met.
 - NAWAC does note that good progress has been made in some areas. The Committee has been impressed with the reporting on rehoming initiatives and the launch of the "Great Mates" programme in prisons.
- Areas in which welfare reform has stalled or regressed or where new issues have emerged since the reviews above:
 - While the development of the Greyhound Health & Welfare Standards and other policies (such as the vaccination policy, euthanasia policy, breeding policy, and puppy socialisation guidelines) has been positive, NAWAC would like to see more information on how these standards, policies and guidelines have been implemented and how well greyhound trainers are adhering to them.
 - The greyhound welfare committee has not seen any data from the RIU audits of kennels. It would be useful to understand how well greyhound trainers are adhering to rules (both internal industry rules, and codes of welfare) and what happens if breaches occur.
 - It was stated to the welfare committee that barking muzzles were used on raceday and are sometimes used on dogs in kennels. Given that Regulation 12 (Muzzles on Dogs) of the Animal Welfare (Care and Procedures) Regulations 2018 do not allow restrictive muzzles to be used when the dog is unsupervised, this information was concerning to NAWAC. The use of barking muzzles (at home and on racedays) was reported to MPI's compliance team. Two letters had to be sent to GRNZ to remind them of the relevant regulation as muzzles continued to be used after the first letter. Despite this, out of date advice on permitted muzzles was still available on the GRNZ website on the 3rd June 2021. NAWAC is concerned that some greyhound trainers are knowingly in breach of Regulation 12 and that this is a regulation for which it is difficult to monitor compliance.

- The quality of kennel accommodation was of concern. Again, it was raised anecdotally, but some information provided to the welfare indicated that everyday life in kennels may be a welfare issue. Sizes of kennels must be in accordance with the code of welfare for dogs, and bedding should be provided to ensure thermal comfort. Dogs must be provided with exercise, social contact, and enough stimulation to avoid abnormal repetitive behaviour such as biting on the wire/bars of the kennel.
- Inadequate processes for socialisation of greyhound puppies early in their lives has been a consistent concern for NAWAC. This is a critical period for dogs to learn skills that will equip them for their eventual rehoming into a household. Reports of dogs that are afraid of everyday situations, or are habituated to chasing pets, have been concerning to NAWAC. While GRNZ appear recently to have recognised this in their policy statements, NAWAC would urge the industry to develop education material and support for greyhound breeders to provide better puppy socialisation. NAWAC is concerned about how this will be enforced or monitored such as patterns in the source of fearful dogs coming through rehoming programmes based on behavioural assessment data.
- Several health issues were of concern. It was reported that some dogs are found to be blind, or have trouble with their eyesight, when they are rehomed. Experts at Massey University have been consulted but to NAWAC's knowledge the cause of this issue has not been established. Several reports were made of dogs suffering from high worm burdens, including at least one dog that collapsed at a race. To NAWAC's knowledge it was never clearly established whether this was due to trainers not worming their dogs adequately, or resistance to the medication. Teeth problems were raised on several occasions, and it was reported that greyhounds do not necessarily have their teeth checked frequently. A number of possible initiatives were discussed by the welfare committee as a means by which to better understand this issue. However, due to the welfare committee meetings being cancelled it has not been possible to follow up on how or if this has progressed. Providing for the basic health needs of dogs is a requirement of the Animal Welfare Act and the codes of welfare.
- Transport of dogs was discussed by the welfare committee on several occasions, particularly after mortality events due to heat stress and associated with transport on ferries. Greyhound trainers and staff must adhere to their obligations under the Animal Welfare Act and the code of welfare for transport.
- Raceday injuries continue to occur, and NAWAC has not seen any long-term reporting that shows a reduction over time. In addition, NAWAC is aware that in other racing codes, injuries are monitored and reported for up to seven days after each race (as some injuries are not immediately apparent) - NAWAC would like to see this implemented in greyhound racing, too.
- Population modelling is an ongoing concern. NAWAC has not been able to view data from GRNZ's databases to ensure that the population is stable, and dogs are not being bred in excess. In addition, while GRNZ has a breeding policy so that trainers must apply to breed a greyhound in certain circumstances, to NAWAC's knowledge, every application to breed a greyhound outside of policy has been approved. The welfare committee was not supportive of allowing these exemptions but was over-ruled by the board. Justifications for approvals were requested but were not provided.

- While NAWAC has no reason to question RIU's performance in terms of testing greyhounds or trainers for illicit substances, the recent reports in the media of greyhounds testing positive for meth have been concerning.
- Recommendations to further improve the welfare of greyhounds through all stages of life, including retirement from racing:
 - Dogs should be cared for to the standard described in the Recommended Best Practices of the relevant codes of welfare.
 - In addition to this, and to addressing the points raised above, NAWAC considers that for the greyhound racing industry to remain acceptable to society, it will be critical to find ways to provide for positive welfare for greyhounds. See [NAWAC's webpage on animal sentience](#) for further information on positive welfare.
 - Whole of life tracking of dogs from birth till death and reasons for euthanasia/culling needs to be transparent and reporting needs to reflect all animals born into the industry.
- Is a more fundamental review of the greyhound industry necessary?
 - Yes, NAWAC considers that a more fundamental review of the greyhound industry is necessary.
 - Even if the Hansen report recommendations have been met, NAWAC considers that there is a need for continuous improvement in the welfare of racing dogs (and for all animals). The Hansen report recommendations are focused on minimising welfare harms, but in addition, positive welfare opportunities must be provided.
 - NAWAC is currently developing a set of principles to use when considering justification of any welfare impacts when the purpose of the animal use is for exhibition, entertainment or encounter. These principles are still draft, and the aim is to eventually release them as a NAWAC guideline. Nevertheless NAWAC considers it appropriate to test them in this submission.
 - The Committee refers to these principles, below, to support the need for a fundamental review.

Principles for the use of animals in entertainment

1. *The animal and its welfare are paramount. It must be clear that the activity in question is the minimum necessary to provide for the benefits society seeks from it whilst keeping negative animal welfare impacts to a minimum.*
 - a. NAWAC has concerns that, as an activity, greyhound racing is not the minimum necessary to provide the benefits that society is seeking from it. The main perceived benefit would seem to be provision of opportunities for gambling but NAWAC does acknowledge that there may be benefits for the human participants associated with their interactions with their dogs. These benefits sit against our views expressed above that many negative animal welfare impacts of greyhound racing are not being fully addressed.

2. *It must be clear that there are no appropriate alternatives to the activity in question that provides the same benefit to society and poses less of a risk to animal welfare.*
 - b. There are alternatives to greyhound racing that pose less risk to animals. If gambling is the primary benefit, NAWAC notes that there are multiple other opportunities for gambling on other sports or utilising virtual alternatives like that seen in Australia. If the benefit is from human-animal interaction then NAWAC notes other dog activity/agility-based events where these interactions can be enjoyed with less welfare impact on the animals concerned.
3. *There must be evidence that the activity in question, in its current state, can successfully mitigate negative animal welfare impacts that it may inflict.*
 - c. It may be possible for greyhound racing to mitigate negative animal welfare impacts, but significant changes would need to occur. NAWAC considers that in particular this should include racetrack modification and management to reduce injuries to acceptably low levels. The issues outlined above would also need to be addressed.
4. *There must be evidence that the activity in question reviews its practices in a frequent manner with aim to reduce or eliminate negative animal welfare impacts that it may inflict.*
 - d. GRNZ does review its practices frequently, however, as described above, NAWAC is uncertain whether the most recent review (the Hansen report) has resulted in ineffective reduction or elimination of many negative welfare impacts. To be effective, reviews need to provide accurate data allowing comparison to benchmarks and identifying where further effort should be directed. NAWAC see this as an iterative process and the current position of GRNZ on further reporting is therefore a cause for significant concern.
5. *There must be clear evidence that the activity in question does provide for positive animal welfare.*
 - e. Good animal welfare, and a good life, can be achieved only when animals can have experiences that they find rewarding and positive. It is not clear that greyhound racing provides opportunities for positive welfare experiences for greyhounds. While GRNZ's tagline includes "they love to race", NAWAC considers scientific evidence should be provided to support statements like this. NAWAC would also point out that even were this statement shown to be correct, the dogs spend the larger proportion of their lives not racing¹ and it is uncertain whether opportunities for positive welfare are made available during these times.

¹ Palmer, A.L.; Bolwell, C.F.; Stafford, K.J.; Gal, A.; Rogers, C.W. Patterns of Racing and Career Duration of Racing Greyhounds in New Zealand. *Animals* **2020**, *10*, 796. <https://doi.org/10.3390/ani10050796>