



**Customs Legislation Amendment
(Commercial Greyhound Export and Import Prohibition) Bill 2021**

Greyhounds Australasia

Response to Supplementary Questions on Notice

10 October 2023

CONFIDENTIAL



1. RESPONSE OVERVIEW

Greyhounds Australasia (GA) is a private company, whose shareholders (Directors) are limited to bodies that are authorised by statute to control or regulate greyhound racing, in the states and territories of Australia and New Zealand.

By reason of the state/federal political system, each controlling body administers greyhound racing within its own jurisdiction, with GA being the support arm to create consistency and uniformity where that outcome is in the best interests of its members.

GA's membership base is representative of the eight independent jurisdictional industry control authorities across Australia and New Zealand, including:

- Racing Queensland Limited (RQ)
- Greyhound Racing Victoria (GRV)
- Northern Territory Racing Commission
- Racing and Wagering Western Australia (RWWA)
- Greyhound Racing New South Wales (GRNSW)
- Tas Racing
- Greyhound Racing South Australia (GRSA)
- Greyhound Racing New Zealand (GRNZ)

In several jurisdictions, there is a divested commercial and regulatory framework, which in turn sees State Government agencies responsible for the regulation of the greyhound industry, operating alongside the commercial Control Body. This includes the regulatory authorities for:

- NSW - Greyhound Welfare & Integrity Commission (GWIC)
- Queensland – Queensland Racing and Integrity Commission (QRIC)
- Tasmania - Office of Racing Integrity (ORI), and
- New Zealand – Racing Integrity Board (RIB).

As statutory bodies with powers and responsibilities under their respective state and territory legislation, the member jurisdictions of GA and state greyhound racing regulatory bodies (state government agencies) have ongoing reporting requirements directed by their respective state and territory Governments.

This includes the publication of statutory documents such as annual reports and other state ministerial or departmental reporting requirements. Consequently, industry reporting is completed on a jurisdictional level, in line with respective state legislative requirements. All state and territory jurisdictions publish these reports on their websites.

The charter of GA is to support these jurisdictions via the encouragement of a national approach to the Australasian greyhound racing industry, promote the integrity of the industry and, where possible, coordinate a national approach to animal welfare, industry management, policies and practices.

2. QUESTIONS ON NOTICE - RESPONSE

1. GREYHOUND BREEDING UNITS (SEMEN)

a. THE NUMBER OF UNITS OF GREYHOUND SEMEN EXPORTED FROM AUSTRALIA AND THE COUNTRIES TO WHICH THESE UNITS OF SEMEN HAVE BEEN EXPORTED.

EXPORTED BREEDING UNITS FIVE YEAR PERIOD (FY19-FY23)						
STATE	DESTINATION	FY2019	FY2020	FY2021	FY2022	FY2023
NSW	Germany	0	0	0	4	0
	Ireland	0	0	0	11	29
	New Zealand	25	131	76	68	74
	United Kingdom	0	0	33	0	13
	United States	18	0	0	8	0
NT	N/A	0	0	0	0	0
QLD	N/A	0	0	0	0	0
SA	N/A	0	0	0	0	0
TAS	N/A	0	0	0	0	0
VIC	Canada	0	4	0	0	0
	Finland	0	2	0	0	0
	Ireland	0	0	0	0	47
	New Zealand	19	35	88	29	34
	United Kingdom	0	0	0	0	0
	United States	39	12	0	0	0
WA	N/A	0	0	0	0	0
TOTAL		101	184	197	120	197

b. THE NUMBER OF UNITS OF GREYHOUND SEMEN IMPORTED TO AUSTRALIA, AND THE COUNTRIES FROM WHICH THESE UNITS OF SEMEN WERE IMPORTED.

IMPORTED BREEDING UNITS FIVE YEAR PERIOD (FY19-FY23)						
STATE	Country of Origin	FY2019	FY2020	FY2021	FY2022	FY2023
NSW	Ireland	0	0	0	0	2
	United States	0	0	0	22	0
NT	N/A	0	0	0	0	0
QLD	Ireland	0	0	48	0	0
	United States	0	57	0	0	0
SA	N/A	0	0	0	0	0
TAS	N/A	0	0	0	0	0
VIC	Ireland	169	43	77	36	149
	United States	215	105	194	248	55
WA	N/A	0	0	0	0	0
TOTAL		384	205	319	306	206

2. BREEDING UNIT (SEMEN) DATA PUBLICATION

As a private company, Greyhounds Australasia provides data in relation to its provision of industry services directly to its member bodies, via the GA Board of Directors. Where deemed appropriate by the GA Board the data may be utilised by Members, Industry Regulators, and other industry groups such as GA Committees. Publication more broadly is a matter for determination by the GA Board.

3. BREEDING UNITS (SEMEN) DATA PUBLICATION

- a. the number of units of greyhound semen subject to GAR 62 (2) (a) refers to breeding vials used in addition to the allocated 54 vials per quarter, in instances where breeding females have missed

SEMEN UNITS RELEASED FROM STORAGE (Missed Service)					
STATE	FY2019	FY2020	FY2021	FY2022	FY2023
NSW	0	0	0	0	1
NT	0	0	0	0	0
QLD	0	0	0	0	0
SA	0	0	0	0	0
TAS	0	0	0	0	0
VIC	46	19	17	15	2
WA	0	0	0	0	0
TOTAL	46	19	17	15	3

These are vials originally registered for storage purposes, where the units were released to market use to cover a miss (with Controlling Body approval).

- b. the number of units of greyhound semen subject to GAR 62(2)(b)(i) refers to breeding vials collected for storage and used in instances where sire dies, or sire becomes infertile

SEMEN UNITS RELEASED FROM STORAGE (Illness or Death)					
STATE	FY2019	FY2020	FY2021	FY2022	FY2023
NSW	97	24	0	0	0
NT	0	0	0	0	0
QLD	0	6	0	0	0
SA	0	0	0	0	0
TAS	0	0	0	0	0
VIC	102	270	384	0	162
WA	0	0	0	0	0
TOTAL	199	300	384	0	162

These are vials originally registered for storage purposes, where the units were released to market use, following infertility or death of a sire.

- c. the number of units of greyhound semen that Greyhounds Australasia rule 62(2)(b)(ii) refers to breeding vials collected for storage and used in addition to the allocated 54 vials per quarter for export to a country other than Australia or NZ.

In the past five years, there have been no instances whereby units of semen collected for storage have been subsequently allocated directly to export.

4. BREEDING SERVICES DATA PUBLICATION

- a. the number of times a controlling body has exercised the power under [Greyhounds Australasia rule 62\(4\)](#) – *GAR 62 (4) Refers to circumstances whereby a failed vial is replaced by another vial from a different sire above the allocated 54 per quarter (must be extraordinary circumstances)*

In the past five years, there have been no instances whereby this exemption has been requested and consequently provided.

- b. the “extraordinary circumstances” that led to these exercises of the power of a controlling body under [Greyhounds Australasia rule 62\(4\)](#)

The need for extraordinary circumstances sets a very high bar for the exercise of this power. The onus would be on the participant to show that the circumstances are such that it would be highly impractical or impossible for the standard return services provisions to apply. Examples may be that there is no available semen from the sire that provided the vial of semen used in the initial service, however, the provider of the semen has semen available of a similar nature and value from a sire with similar traits.

5. GREYHOUND BREEDING FEMALES’ DATA

- a. the number of breeding greyhound females that have been serviced.

Female Greyhound Services FY2019 – FY2023					
State	FY2019	FY2020	FY2021	FY2022	FY2023
VIC	738	678	778	774	653
NSW	667	673	857	795	608
QLD	223	236	245	238	194
SA	109	123	148	155	118
WA*	67	93	107	76	65
TAS	61	52	61	50	43
Totals	1865	1855	2196	2088	1681

- * RWWA reporting period 1st August – 31st July.

b. the number of greyhound litters that have been whelped by breeding females.

Greyhound Litters Whelped FY2019 – FY2023					
State	FY2019	FY2020	FY2021	FY2022	FY2023
VIC	702	640	707	750	641
NSW	563	625	709	680	655
QLD	184	131	226	205	166
SA	82	74	116	120	74
WA*	64	88	103	75	77
TAS	46	32	41	44	34
Total	1,641	1,590	1,902	1,874	1,647

c. the number of “further services” approved under GAR 57(2) refers to breeding females provided an exemption to breed post 8 years of age.

Further Services GAR 57(2)					
STATE	FY2019	FY2020	FY2021	FY2022	FY2023
NSW	49	61	80	77	49
QLD	9	12	13	14	3
SA	7	3	3	5	2
TAS	3	3	2	0	2
VIC	69	94	100	103	82
WA*	3	7	2	4	3
Total	140	180	200	203	141

d. the number of “further services” approved under GAR 58(2) refers to breeding females provided an exemption to breed post their 3rd litter.

Further Services GAR58(2)					
STATE	FY2019	FY2020	FY2021	FY2022	FY2023
NSW	17	16	13	21	21
QLD	4	1	6	4	3
SA	3	3	14	7	3
TAS	2	0	0	0	1
VIC	9	0	0	0	1
WA*	7	0	2	4	4
Total	42	20	35	36	33

6. EUTHANASIA DATA PUBLICATION

GA Member Control & Regulatory authorities do not use the same terms and definitions as those prescribed 8 years ago in a report related to a single jurisdiction.

As such those definitions do not reflect the categories of euthanasia data stored and published by Control Bodies and Regulatory Authorities, who have nuanced euthanasia categories as part of their legislated individual reporting requirements.

Under the GA Rules, euthanasia of a greyhound is a notifiable, Veterinary Only procedure and is subject to Local Rules across jurisdictions whereby strict conditions (injury, illness or temperament (unsuitable for rehoming)) are prescribed and under which it is permitted.

Greyhound Racing Victoria

- a) The data below reflects the euthanasia figures for GRV, separated into the categories GRV utilises.

VICTORIA - GRV	FY2019	FY2020	FY2021	FY2022	FY2023
Euthanised Due to Injury	292	257	223	196	218
Euthanised Temperament (unsuitable)	270	170	80	53	34
Euthanised Illness and Other	150	109	103	110	134

GRV does not permit euthanasia on the grounds of “not suitable for racing” LR 42.6 of the Local Rules (GRV) prescribes the permitted grounds.

- b) GRV publishes data related to euthanise in its annual report every year, which is publicly available online.

Racing and Wagering Western Australia

- a) The data below reflects the euthanasia figures which include the subcategories given below (periods reported are from 1st August – 31st July):

RWWA	FY2019	FY2020	FY2021	FY2022	FY2023
Deceased or euthanised due to illness/injury	49	19	26	28	34
Euthanised not suitable for rehoming	34	17	0	2	2
Euthanised not suitable for racing	0	0	0	0	0

RWWA does not permit euthanasia on the grounds of “not suitable for racing” LR 122 of the Local Rules (RWWA) prescribes the permitted grounds.

b) These are published in the RWWA annual report every year which is freely available online

Greyhound Racing South Australia

South Australia - GRSA	FY2019	FY2020	FY2021	FY2022	FY2023
Deceased or euthanised due to illness/ injury	69	53	42	44	31
Euthanised not suitable for rehoming	37	16	16	4	1
Euthanised not suitable for racing	0	0	0	0	0

GRSA does not permit euthanasia on the grounds of “not suitable for racing”. L130 of the Local Rules (GRSA) (and pre-31/01/2022, LR114) prescribes the requirements for retiring greyhounds.

b) Data available via GRSA Annual Reports 2021) and 2022 and GRSA Statistical Review 2023.

Queensland Racing Integrity Commission

Queensland - QRIC	FY2019	FY2020	FY2021	FY2022	FY2023
Deceased or euthanised due to injury	198	100	97	134	158
Euthanised not suitable for rehoming	47	88	55	67	163
Euthanised not suitable for racing	27	8	9	0	4

Queensland currently do not have a euthanasia or rehoming local rule however Racing Queensland are in the final stages of drafting a suitable rule that will require consultation before coming into effect. This rule will generate similar protections as other jurisdictions, effectively preventing euthanasia due to not suitable for racing and significantly limit the justifications for euthanasia due to injury or not being suitable for rehoming.

b) The Queensland Racing Integrity Commission publishes data related to euthanasia and other pertinent statistics in its quarterly reports. It is publicly available online.

Tasracing / Office of Racing Integrity

The data below reflects the euthanasia figures for Tasmania.

Tasmania - ORI	FY2019	FY2020	FY2021	FY2022	FY2023
Deceased or euthanised due to injury	58	54	27	29	18
Euthanised not suitable for rehoming	38	25	1	0	1
Euthanised not suitable for racing	35	14	0	0	0

- c) Tasmanian Office of Racing Integrity commenced publishing data related to euthanasia quarterly (commencing July 2023). It is publicly available online.

Greyhound Welfare and Integrity Commission

- a) The data below reflects the euthanasia figures for the Greyhound Welfare and Integrity Commission (GWIC), separated into the categories the GWIC utilises.

New South Wales - GWIC	FY2019	FY2020	FY2021	FY2022	FY2023
Euthanasia (not at racetrack) due to injury or illness	396	380	431	420	522
Euthanasia at racetrack due to injury, or sudden death at racetrack	97	52	59	50	66
Euthanasia due to Emergency	0	1	1	0	0
Failure to Re-home	36	28	19	5	3
Behaviourally unsuitable for rehoming or a known risk to people	106	59	20	15	19

The GWIC does not permit euthanasia on the grounds of “not suitable for racing”. The permitted preconditions are prescribed within the GWIC Greyhound Rehoming Policy.

- d) The Greyhound Welfare and Integrity Commission publishes data related to euthanasia within its quarterly and annual reports. It is publicly available online.

Northern Territory Racing Commission

The data below reflects the euthanasia figures for the Northern Territory

Northern Territory - NTRC	FY2019	FY2020	FY2021	FY2022	FY2023
Deceased or euthanised due to injury	13	6	11	1	3
Euthanised not suitable for rehoming	3	6	4	1	3
Euthanised not suitable for racing	0	0	0	0	0

The NTRC does not permit euthanasia on the grounds of “not suitable for racing”. The permitted preconditions are prescribed within the NTRC Policy for the Welfare of Greyhounds.

7. ILLEGITIMATE GREYHOUND EXPORT TO CHINA

For all the greyhounds listed on the breeding website in China referred to by the ABC article, and which was discussed in the inquiry hearing,

Greyhounds Australasia has sought to compile a list of all greyhounds within the “*breeding website in China referred to by the ABC article*.” A copy of this list was subsequently provided to all Greyhound Australasia’s “member bodies” and Greyhound Industry Regulators for review.

The list of greyhounds depicted within the “*Chinese Website*” contains an alleged 681 Australian greyhounds. Of these, **411 greyhounds (60.3%)** predate the 2010 introduction of GA Rules in relation to mandatory greyhound passports, greyhounds now aged between 15 and 20 years.

Our review of the website confirms that a further **21 greyhounds** listed have never left the Australasian region. Furthermore, some greyhounds listed for breeding predate artificial insemination practices and frozen semen collection, including a sire “*Brother Fox*” with a recorded whelping date of 1983, confirming this greyhound is 40 years of age.

Regarding the illegitimate export of greyhounds - since 2015, Greyhound Regulatory Authorities have conducted over 30 investigations into the illegitimate export of **464 Australian greyhounds** involving over 100 industry participants.

These investigations (tabled below) have resulted in 33 licensed participants being charged and convicted of breaches of the GA Rules of Racing. Penalties have included multiple suspensions and disqualifications, fines of up to \$22,000 and a warning-off (Life Ban) from racing. Serious offenders have remained unlicensed by regulators following the serving of their penalties.

Other known offenders associated with the historical greyhound export to China chose to self-exclude from the industry, by relinquishing their licenses, when regulators closed in on the activity in 2015.

Industry regulators confirm that Australian greyhounds listed on the “*Chinese website*”, who have a whelping date after 2015 (*i.e. greyhounds 8 years of age or younger*), have all been subjected to, or are currently the subject of an investigative process.

These actions align with the ongoing commitment of the greyhound industry, to reduce the number of greyhounds, exported to non-approved jurisdictions to zero. In line with issues associated with procedural fairness, details associated with ongoing or future investigations will not be provided.

Greyhounds Exported In Breach Of The Passport Rules

GA “member bodies” and Greyhound Industry Regulators have provided the following information relating to current and historical investigation and disciplinary action associated with the export of greyhounds without passport:

Year	Jurisdiction	Licensed Participants	Greyhound	Penalty Imposed
2017 - 2023 Period	GRV	22 Investigations were conducted in relation to 21 Victorian participants.	4 Greyhounds	<p>1 ongoing investigation</p> <p>2 involving disqualification 8 months and \$1000 fine, and 18 months respectively.</p> <p>1 involving a 6-month suspension and wholly suspended \$2000 fine.</p> <p>2 involving fines; \$1250, and \$2450 (\$450 of which suspended) respectively.</p> <p>2 incomplete as the participant is inactive / not in Victoria.</p> <p>14 where no offence was identified.</p>
FY 2017	GRV	A major investigation was conducted in relation to 71 Victorian participants.	20 Greyhounds	<p>1 Participant was warned off, after surrendering license.</p> <p>14 Participants issued fines ranging from \$250-\$1000.</p> <p>13 Participants issued cautions, with no formal finding of guilt.</p> <p>34 were issued an education letter, with no formal finding of guilt.</p> <p>4 participants no further action taken.</p>

				5 participants investigation could not be completed, as they had surrendered their licenses and/or refused to participate. These participants are no longer active, in Australasia.
FY2023	GRSA	1 Investigation	2 Greyhounds	1 ongoing investigation
FY2019	GRNZ	1 Participant	3 Greyhounds	\$1000 Fine (Transfer Offence).
October 2017	GRNSW	3 Participants: Charged & convicted.	98 greyhounds	2 x Disqualified for 12 months and fined \$21,300 each. Another was disqualified for 6 months.
May 2017	GRNSW	2 Participants: Charged & convicted.	212 greyhounds	Fined \$22,000 each and disqualified for 3.5 years
May 2018	GRNSW	1 Participant: Charged & convicted.	120 greyhounds	Fined \$14,000 and disqualified for 3 years
FY 2016	QRIC	1 Participant Charged & convicted	1 Greyhound	\$300 Fine
FY 2016	QRIC	1 Participant Charged & convicted.	4 Greyhounds	\$600 Fine

Further information:

To discuss this submission or any aspect contained therein, please

Chief Executive Officer
Greyhounds Australasia