



Greyhound Racing New Zealand

Response to New Zealand Racing Board

**Re: Report to New Zealand Racing Board on Welfare
Issues Affecting Greyhound Racing in New Zealand**



14 December 2017

John Allen
Chief Executive
New Zealand Racing Board
PO Box 380 899
Wellington Mail Centre 5045

Dear John

Hansen Report on Greyhound Animal Welfare

Thank you for providing Greyhound Racing New Zealand (GRNZ) with a copy of the recently completed report on Welfare Issues Affecting Greyhound Racing in New Zealand by Hon Rodney Hansen CNZM QC. The Board of GRNZ has met to consider the report and the recommendations contained within it, and **attach** a copy of our response.

We welcome the report and we will address the elements contained within it. We were supportive of the New Zealand Racing Board (NZRB) commissioning the report and look forward to your continued support as we develop the various initiatives required to address the recommendations.

We have already made animal welfare one of the key planks of our new strategic plan released in May this year. We are well down the path of continued reform and have a strong plan through to 2020 as outlined in our strategic plan.

We have made significant progress since 2013 and while there are no surprises in the report, the new signpost from the Hansen Report is clear - we have to keep going forward.

Kindest regards

A handwritten signature in black ink, appearing to read "Sean Hannan", with a flourish at the end.

Sean Hannan
Chairman

Encl.

**We love our dogs.
They love to race.**

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Detailed Response to Hansen Recommendations

Animal Health and Welfare

- (1) 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.***

- (3) 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.***

GRNZ has been working on the new GRNZ Health and Welfare Standards that will replace our current GRNZ Code of Welfare (2013), for the last six months. The aim of this review was to modernise the current Code and align the standards with the new Ministry of Primary Industry (MPI) regulations and amendments to the Animal Welfare Act. This has been done in consultation with MPI and our Animal Welfare Committee, who have had significant input into the content.

The Animal Welfare Committee has an Independent Chairperson and includes members and observers from the RNZSPCA, New Zealand Veterinary Association (NZVA), Racing Integrity Unit (RIU) and National Animal Welfare Advisory Committee (NAWAC). The standards include socialisation and habituation and will be finalised early next year. Best practice for socialisation and habituation will also be a part of our education program.

Once the new Health and Welfare Standards are finalised, every Licensed Person (LP) will be sent a copy, and our current Code of Welfare will be replaced on our website with the new Standards. We then plan to roll out a series of campaigns aimed at highlighting the key areas of the new standards and how they impact on routine greyhound husbandry procedures and kennel management. Educational material related to the standards will also be distributed via promotional posters.

In addition, we plan to undertake a scoping project next year that will include a proposal outlining the development of our overall education program over the next three years. We have had initial discussions with Primary ITO and are engaged with New Zealand Equine Education Trust (NZEET).

Implementation Plan:

- 4th Quarter F18 - GRNZ Board approval of Health and Welfare Standards
- 1st Quarter F19 - Health and Welfare Standards sent to LPs
- 1st Quarter F19 - Stage one of educational campaign released
- 3rd Quarter F19 - Education scoping project complete.

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

Public Trainers currently undergo a kennel inspection annually and other licenced persons every second year. We now have agreement from the Racing Integrity Unit (RIU) that all properties will undergo a kennel inspection every year. The annual inspection process will also form part of the census initiative (see details below).

GRNZ will also undertake a review of the kenneling inspection process in conjunction with the RIU to ensure the information being collected and monitored is aligned with our new Health and Welfare Standards.

GRNZ will also work with the RIU to implement a trial track inspection process.

Implementation Plan:

- Agreement confirmed with the RIU for annual inspections for **all** kennels.
- RIU to confirm implementation time frame and advise GRNZ. Dependent on RIU feedback:
 - 4th Quarter F18 and 1st Quarter F19 - Refine process and execute Census.

(4) 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.

Vaccination requirements are being addressed through the new Health and Welfare Standards. The goal will be for annual vaccinations to be recorded in each dog's race book and for this to be a condition for race nomination and enforced at the track by the RIU. In addition, trainers will be required to maintain a kennel log book to record all treatments administered. We will agree a compliance plan in conjunction with the RIU.

Implementation Plan:

- 4th Quarter F18 - new race book and log book to be launched for the start of the new racing season.
- RIU to confirm compliance plan implementation time frame and advise GRNZ.

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

In principle, we agree ear branding is a stressful procedure for young puppies and we plan to ban this procedure.

However, it is important that we consult with the RIU in the first instance to ensure we maintain the integrity around accurately identifying each dog on race day. We are working in collaboration with Greyhound Australasia to investigate alternative methods for secondary identification. This may be as simple as improving the current marking procedure. However, we believe the microchip technology has come a long way in terms of reliability which is why we don't see the need for continuing to ear brand.

Implementation Plan:

- There will be a transitional period following consultation with the RIU with the clear objective to stop ear branding as soon as possible.

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

This needs to be scoped and we will engage with New Zealand Veterinary Association (NZVA) to discuss a suitable strategy to address this.

Implementation Plan:

- 1st Quarter F19 - Consultation with NZVA completed.

Registry and Database

(6) 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.

We have addressed this and all breeding females will now have to be registered with GRNZ.

Implementation Plan:

- This will be in place for the start of the next racing season in 2018.

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

This important project has already commenced with the Board of GRNZ approving a capital expenditure budget of up to \$500k earlier in the year to address and resolve the issue.

The GRNZ database was initially established to support racing operations only. As a result it has limited functionality and reporting capability, and it is at the end of its useful life.

We now know that we need a cloud based, fully fledged Customer Relationship Management (CRM) tool that can support the modeling and enhanced reporting needs GRNZ now requires.

A scoping project is underway with the first stage of the Project plan to include upgrades to the framework and administrative functions and improving the reporting capabilities.

Implementation Plan:

- 2nd Quarter F19 - Reporting and framework enhancements completed
- 4th Quarter F20 - Final project delivery.

(8) 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.**

The RIU have agreed to undertake a initial and then ongoing annual census where every dog will be microchip scanned during the annual kennel inspection process. This data will then be integrated into the GRNZ database to establish a base for the accurate tracking of every dog.

Once we have received the inspection procedure, process and timing from the RIU, we will work with them to fine tune the process and develop the new kennel inspection forms. The RIU will then test run the process, equipment and new reporting portal in 2018 so that the we are both in a position to execute by the beginning or just after the new racing season in August 2018.

Implementation Plan:

- RIU to advise GRNZ of data collection process and procedure
- Dependent on RIU feedback:
 - 4th Quarter F18 and 1st Quarter F19 - Refine process and execute Census.

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

A new de-registration form is in place now, which requires the address and contact details of the new owner to be provided to GRNZ.

We will contact each individual annually in line with the new annual census process so that we can update the database accordingly.

Implementation Plan:

- New forms are implemented now.
- Letter completed by 1st Quarter F19.

(11) 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 raceday to ensure that registration is up-to-date.

GRNZ wants all licensed people to comply with Council registration requirements. This is a complex area given the variability in dog registration fees and processes applied by each individual Territorial Local Authority (TLA) across the country.

We will work with Local and Central Government to identify a strategy and process which may include a reclassification of Greyhounds as working dogs.

Implementation Plan:

- 1st Quarter F19 - initiate discussions with Local and Central Government to determine strategy.

Dog Tracking/De-registrations/Euthanasia

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

GRNZ will consult with New Zealand Veterinary Association (NZVA) to develop a suitable strategy to address.

Implementation Plan:

- 1st Quarter F19 - Consultation with NZVA completed.

(12) 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.**

We have taken steps to improve the processes and these are:

- We now have a new requirement that from the four (4) month old registration of a litter and any transfer of location or owner, must be accompanied by a change of ownership notification to track the puppies up until racing registration.
- As part of upgrading the database, an automated alert systems will be implemented to alert us to any dogs that have not raced for a three (3) month period and action will be taken to follow up on the dogs' status.
- The RIU census data integrated into the database will be matched against our dog registration and de-registration records, which will enhance our monitoring and enforcement systems to track dogs at all stages of the life cycle.
- We have employed an independent auditor to undertake an annual audit of all of our processes around collecting, recording and the organisation of our data to ensure transparency and accountability of all of our animal welfare data reporting.

Implementation Plan:

- New form and process for registration of puppies launched immediately.

- Discuss alert system with our technology provider to put in a process immediately as part of the database project.
- Census (process and timings as outlined above in recommendation # 8).

(13) 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.

GRNZ is committed to reducing euthanasia rates and rehoming as many retired greyhounds as possible.

A new rule is going through the formal adoption process now.

It is our intention to implement a procedure where there will be specific requirements and criteria to meet before approval can be given to euthanise a dog, including compulsory, independent re-homing and temperament assessments.

Implementation Plan:

- New rule is going through the formal adoption process now.
- 1st Quarter F19 - Scoping of new process and communication of procedures completed and implemented.

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

We are working closely with the New Zealand Racing Board (NZRB), specifically the Optimise the Calendar team and the Dates Committee to create more racing opportunities.

There is a current, active proposal in place for consideration by the Dates Committee, specifically focused on delivering new racing opportunities within the Central districts region.

Implementation Plan:

- Discussions are underway with the Dates Committee. Any modifications require the support of the other racing Codes and the NZRB.

(15) 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.

Rehoming has been a core element of the GRNZ welfare programme since the WHK review. Since the review, we have purchased a kennel facility located in Levin, increased the level of funding for the Greyhound Adoption Program (GAP) and introduced a new re-homing partner in Nightrave.

Despite our best efforts, the need to further lift rehoming numbers remains. As a result, GRNZ has engaged KPMG to undertake a review of GAP/ Rehoming to assist GRNZ in developing an appropriate model and resource plan focused on lifting our rehoming numbers.

We have also entered into discussions with other service providers in an effort to grow the network of rehoming partners we are able to work with and ultimately grow the numbers of greyhounds rehomed.

Implementation Plan:

- 4th Quarter F18 - KPMG review completed.
- 1st Quarter F19 - KPMG recommendations scoped.
- 3rd Quarter F19 - Revitalised rehoming initiatives launched.

(16) 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.

GRNZ has recognised that population management is an area that requires greater focus. In late 2016, GRNZ invested a significant amount of resource into developing a very sophisticated population modelling tool. This tool was developed over six months by one of the top economic analysts and advisory firms in the country and is now ready for use.

This population management tool will greatly assist us in understanding the implication of decisions we may make at an industry level. It will assist us in balancing the numbers of dogs coming in and out of the sport and enable us to input data to predict dog populations and assess the implications on breeding, imports, re-homing and euthanasia.

We now have the ability to model any number of combinations to understand their potential impact with the clear view of improving the visibility and controls GRNZ can put in place around breeding and overall dog population management.

We have not had this ability previously and as a consequence, this is a significant step forward for GRNZ.

Implementation Plan:

- 4th Quarter F18 - Validation of data fields for input into the modelling tool
- 1st Quarter F19 - Development of recommendations from analysis and modelling
- Ongoing monitoring.

Track safety

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

This has been implemented with immediate effect.

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

This has been implemented.

A new rule change is going through the formal adoption process now that requires injuries outside of race day to be reported.

The RIU are currently scoping and developing the appropriate procedure and process to manage compliance of this within the regulatory framework.

Once we have a suitable procedure, we will work with the RIU and peer review with the equine codes to ensure standardisation of the approach across all codes.

Implementation Plan:

- 4th Quarter F18 - RIU to confirm implementation time frame and advise GRNZ. Dependent on RIU feedback:
 - 1st Quarter F19 - Process communicated and implemented

(20) NZGRA should continue with its programme 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.**

We are committed to this program of work.

Since the WHK report and through our focus on race track improvements, there has been a significant drop in on-track injuries and deaths over this period leading into the 2016/17 season.

We have invested in sand replacement, improved irrigation, safety rails and pads, drainage and changes to the camber at the majority of our tracks. However, we are committed to a process of continuous, ongoing, improvements to reduce injuries further. The current injury rate is 15 injuries per 1,000 starts which compares favourably with NSW, Australia at 25 injuries per 1,000 starts and Victoria, Australia at 36 per 1000 starts.

Since the WHK report there have been many advancements. GRNZ has been collaborating with Greyhound Racing Victoria (GRV) to investigate opportunities focused on racing innovations with one example being straight tracks. These have been developed in Victoria and New South Wales with the specific objective of creating more racing opportunities for dogs, extending their racing careers (i.e. Veteran racing) and significantly reducing track injuries by eliminating bends in their construction. A recent study by the University of Technology in Sydney reports some promising results regarding the reduction in collisions and injuries on straight tracks.

In conjunction with our current, ongoing investment into our existing track facilities, we are considering the potential for such a track(s) development to complement our existing track infrastructure.

We are also collaborating with some of the Australian States looking into the benefits of a hoop arm lure which moves the dogs away from the inside rail by approximately a metre and reduces bunching into the turns where most injuries occur.

We have been trialling the hoop arm at various trialling tracks across the country. We have now implemented a hoop arm lure trial at our Otago track during a upcoming race meeting so that we can monitor the results accordingly. We are also waiting on results from hoop arm lure trials in Australia.

A Massey University PhD student has been appointed and work is underway to investigate the training and racing factors affecting the racing career duration of greyhounds, including frequency of racing and association with injuries and career length, training methods, physiological responses to racing and post race recovery.

In addition, a new rule is going through the formal adoption process now to increase the age a greyhound can be raced, from 14 to 16 months.

Implementation Plan

- 1st Quarter F19 - Capture insights from Hoop Arm trials and develop recommendation.
- 2nd Quarter F19 - Straight Track investigation commenced.
- Massey PHD Student appointed, project work is underway. Targeted completion will be 1st Quarter F20.