



**Submission by the
Royal New Zealand Society for the
Prevention of Cruelty to Animals Inc.**

**On the Petition of Aaron Cross for the Greyhound
Protection League of New Zealand: *Ban commercial
greyhound racing in Aotearoa New Zealand***

06 May 2022



Executive Summary

- SPCA is the preeminent animal welfare organisation in New Zealand. Our organisation employs teams of animal welfare scientists, veterinarians, and warranted animal welfare inspectors. We care for thousands of dogs each year. We aim to assist animal owners and industries to improve animal welfare outcomes by working collaboratively.
- In the case of greyhound racing, SPCA has worked for years with the industry in an attempt to improve welfare outcomes for greyhounds (including racing dogs, and dogs who are retired or never race). SPCA is familiar with Greyhound Racing New Zealand, the changes to the Racing Integrity Board, and the steps taken to date to improve greyhound welfare.
- SPCA advises the Petitions Select Committee that the greyhound racing industry of New Zealand has a history of being unwilling or unable to address its significant animal welfare problems.
- Ministers Robertson and Whaitiri also have concerns. They formally placed the industry on notice following the findings of the Robertson Report in 2021, which confirmed that greyhound racing is 'inherently dangerous'.
- To date, SPCA has not seen significant evidence of progress against the recommendations of the Report. We consider it unlikely that the recommendations will be met by December 2022.
- SPCA notes that, despite the fact that we are halfway through the notice period, the Racing Integrity Board does not appear to have provided a clear progress report to the Petitions Select Committee - apart from one paragraph on the establishment of a work programme. In addition, they have publicly stated that all kennel audits to date have found welfare issues, and that many trainers are still unaware of welfare standards.
- SPCA supports the petition and calls for an end to the greyhound racing industry in New Zealand via new legislation or an amendment to the Racing Industry Act 2020.
- SPCA has indicated to Greyhound Racing New Zealand (GRNZ) that we are willing to discuss how we can help rehabilitate and rehome greyhounds during the wind-down period. Planning for the possible closure of the industry must begin as soon as possible to ensure the protection of the approximately 3,000 dogs currently used in the racing industry.



Table of Contents

Introduction	3
Submission.....	3
SPCA considers that the greyhound racing industry of New Zealand is beyond reform	3
Progress against the 2021 Robertson Review recommendations.....	6
Greyhound racing is losing its social license to operate.....	8
Protecting dog welfare in the event of the closure of the industry	9
Conclusion	10
References	11



Introduction

The following submission is made on behalf of The Royal New Zealand Society for the Prevention of Cruelty to Animals (trading as SPCA).

SPCA is the preeminent animal welfare and advocacy organisation in New Zealand. The Society has been in existence for 150 years with a supporter base representing many tens of thousands of New Zealanders across the nation.

The organisation includes 35 Animal Welfare Centres across New Zealand and approximately 60 inspectors appointed under the Animal Welfare Act 1999.

SPCA welcomes the opportunity to make a submission on the Petition of Aaron Cross for the Greyhound Protection League of New Zealand to ban commercial greyhound racing.

Submission

SPCA considers that the greyhound racing industry of New Zealand is beyond reform

SPCA advocates for the end of the New Zealand greyhound racing industry.

This is not a position that our organisation takes lightly. In general, SPCA considers that it is acceptable to use animals for human purposes as long as they have a good life, with opportunities for positive welfare. In areas where our organisation would prefer to see a restriction on the way animals are used, we actively work to have a seat at the table to improve animal welfare outcomes while the activity continues. To this end, SPCA has worked with Greyhound Racing New Zealand (GRNZ) for years in an attempt to improve the lives of greyhounds.

We have found that the greyhound racing industry has demonstrated a history of being unwilling or unable to adequately address its significant animal welfare problems.

The GRNZ Animal Health and Welfare Committee was established in the wake of the 2017 Hansen Report and included our scientific advisers. Our organisation was pleased with progress against some of the recommendations for the first few years. In particular, good progress was made against



rehoming recommendations through partnering with other organisations via initiatives such as the 'Great Mates' programme.

However, SPCA came to find that the information provided to the animal welfare committee was insufficient to ascertain if progress was truly being made. The value of meetings and our ability to make meaningful animal welfare improvements significantly declined.

While the Committee and GRNZ had produced many documents, it was difficult to see whether trainers were even aware of them, or how they were translating into any changes for the lived experience of the racing greyhounds of New Zealand. Apart from the rehoming initiatives, progress seemed to stall.

In late 2020, GRNZ decided to stop reporting to Ministers against the progress of the Hansen recommendations, despite the fact that SPCA and the National Animal Welfare Advisory Committee disagreed and advised GRNZ to continue. Evidence to support GRNZ claims that all Hansen recommendations had been implemented were not forthcoming, despite multiple requests.

GRNZ has chosen not to invite SPCA to a meeting of the Animal Health and Welfare Committee since November 2020, even though the Robertson review called for the health and welfare committee with 'full participation of all relevant stakeholders' and the ability to implement and affect change when required.

Animal welfare issues associated with this industry continue to include physical overexertion, distress, injuries and deaths that result from excessive demands during racing or training; lack of socialisation and environmental enrichment in the kennel environment; inadequate housing and transport; poor nutrition; administration of banned or unregistered substances; the export of greyhounds without control of their welfare; live baiting (using live animals as lures); and difficulties in rehoming greyhounds who may be poorly socialised and/or suffering from health problems.

In terms of enforcement and compliance with the Animal Welfare Act 1999 for these matters, we note that SPCA, MPI and the Racing Integrity Board (RIB) have a Memorandum of Understanding for animal welfare investigations, and cases may be taken by any combination of our organisations, depending on the circumstances. The SPCA Inspectorate does not generally receive many specific/actionable complaints about identifiable dogs - greyhound racing is a small industry, and people can be reluctant



to come forward and provide witness statements. However, our organisation remains concerned about industry-wide welfare problems.

Due to these ongoing animal welfare concerns, SPCA supported the 2021 review. The resulting Robertson Report highlighted the unresolved recommendations from the Hansen Report and described the ways in which GRNZ has unnecessarily obfuscated information.

It is not just the Robertson Report that has found issues. Over the last decade there have been three independent reviews into the welfare of dogs within the greyhound racing industry: the 2013 WHK Report, the 2017 Hansen Report, and the 2021 Robertson Report. All of them have reported significant animal welfare issues and a lack of transparency. The 2021 Robertson Report highlighted some of the same concerns that the WHK Report raised 8 years earlier. In response to the 2021 Robertson Report, Minister Robertson stated that *"I want to be clear today – the greyhound racing industry is on notice: either make the improvements needed or risk closure."* (Beehive Press Release, 2021).

This is not the first time a Racing Minister has been critical. In 2017, then-Racing Minister Winston Peters described the Hansen Report as *"disturbing and deeply disappointing"* (Beehive Press Release, 2017). He called back to previous work then too, stating that he had already intervened in 2006 to launch Greyhounds As Pets and *"It is disappointing the industry is still grappling with these underlying issues."*

This is not even the first petition to ban greyhound racing that has been presented to Parliament. In 2013, a petition to ban greyhound racing was presented to the Government Administration Select Committee. The Committee encouraged the industry to implement the recommendations of a recent welfare review and for the Racing Board to oversee it – a familiar recommendation (Government Administration Select Committee, 2013).

SPCA questions how many predictable cycles of exposés (Kerr-Lazenby, 2021; Morrah, 2022; Reid, 2013; Tan, 2018), doping scandals (RNZ, 2016, 2018, 2021), independent reviews, and petitions the government needs to see before it is clear that this industry cannot meet its animal welfare obligations and is no longer acceptable to New Zealand society.



Progress against the 2021 Robertson Review recommendations

Sir Bruce Robertson submitted the latest independent review to the Minister for Racing in July 2021. In summary, the Robertson Report highlighted the unresolved recommendations from the Hansen Report, as well as issues that have emerged since. Key areas include data recording, transparency of all activities, and animal welfare generally.

The Minister for Racing asked the RIB to identify a specific set of progress indicators over each of the three key areas, reporting back to him before the end of 2022.

SPCA encourages the Petitions Select Committee to seek further information on GRNZ's progress against the Robertson Report to date. In the RIB submission to you, a work programme has been briefly described, but it is not clear if these are mapped to indicators as requested by Minister Robertson, or whether any recommendations are completed already.

A summary of progress against the Robertson Report, that puts the industry's future at risk, does not appear to have been provided by any submitter. SPCA notes that we are now halfway through the notice period. Based on our experiences with GRNZ, we are not confident that all of the recommendations of the Robertson Report can be completed by December 2022.

In May 2022, it has been reported by the RIB that "up to 300 warnings have been issued to greyhound trainers for health and welfare failures in less than a year", and that "almost all" kennels visited since its inception last year have been issued with improvement notices (Morrah, 2022).

In addition to the Robertson Report recommendations, we are concerned about the following issues:

- **Raceday injuries** - Injuries continue to occur at an unacceptably high level. While some steps have been taken to reduce injury rates (for example, an extended arm lure is now in place at one track, sprint boxes redesigned in Palmerston North and a Track Advisor appointed), data has not been made available which shows a clear and ongoing reduction in injuries. The majority of greyhound racetrack injuries occur approaching or rounding the first bend and straight tracks are known to reduce the risk. At the time of the 2017 Hansen report, GRNZ were reportedly considering introduction of straight tracks. In contrast the 2021 Robertson review noted that GRNZ have still not made substantive or widespread changes to courses in New Zealand. We note that the New



Zealand Animal Law Association has stated that subjecting greyhounds to racing, where injuries can be reliably anticipated to occur, arguably amounts to an offence of ill-treatment under the Animal Welfare Act - if it were not for the Racing Act permitting greyhound racing (New Zealand Animal Law Association, 2021).

- **Barking muzzles** – The unsupervised use of restrictive muzzles was banned via animal welfare regulations in 2018. GRNZ continued to push for barking muzzles (so-called because they prevent barking by strapping the mouth shut) to be allowed for years. It is not clear how the information about muzzles has been communicated or enforced. An out of date GRNZ Policy document stating that certain barking muzzles are permitted is, at the time of writing, [still available](#).
- **Breeding** – GRNZ's breeding female policy states only three litters are permitted but includes an exemption process for up to five. The criteria for exemptions is unclear.
- **Blindness** - It has been reported that a number of dogs coming through the rehoming facilities are blind. The cause has not yet been established but a high worm burden was one possibility raised, highlighting concerns about a lack of basic preventative healthcare (a requirement under MPI's Code of Welfare: Dogs).
- **Dental health** - It has been reported that a large number of dogs coming through the rehoming centres have serious dental issues, with many requiring teeth extractions (at 2-3 years of age). Putting into practice regular dental checks to monitor dental health and allow for early intervention in racing greyhounds has been discussed at length but not actioned.
- **Housing** - While the Greyhound Health and Welfare Standards specify kennel size requirements, they apply only to new build and refurbishments. It is not clear what enrichment, if any, is provided to kennelled dogs. It has been reported that some dogs do not receive bedding, because they chew or destroy the bedding.
- **Socialisation** - Incomplete socialisation results in dogs experiencing fear and distress, increases the likelihood of behavioural problems (including predatory aggression), and poses challenges to rehoming. While policies and a handout have been developed, monitoring, education and enforcement is required.
- **Transport** - In 2018, five greyhounds died of heat stress during transport (Hurley, 2018). In 2019, 4 greyhounds were injured and one died after being transported in an unwarranted trailer that



crashed (Judicial Control Authority, 2019). While the current Health and Welfare Standards do have information on transport, again, it is not clear how the standards are enforced.

Greyhound racing is losing its social license to operate

A social license is an intangible, unwritten social contract representing community acceptance of an institution's activities. In response to the 2021 Robertson Report, Racing Minister Robertson stated: *"This is a very clear signal, I believe the clearest signal that's been given to this industry... it is either things improve, or they lose their social licence to exist."*

New Zealand's Framework for Action on Animal Welfare (Ministry for Primary Industries, 2018), released by Minister Whaitiri, sets an aim that New Zealand will be world leading in animal welfare. However, only seven countries operate commercial-level greyhound racing, and new bans are announced frequently (e.g. the States of Arkansas, Florida and Iowa have all recently announced phase-outs of greyhound racing).

New Zealand's animal welfare strategy (Ministry for Primary Industries, 2013) outlines our core values towards animals, and states that it matters how animals are treated – it matters to the animal and it matters to us as a society. SPCA contends that the greyhound racing industry is not capable of meeting these values, and this is why the industry is now in question.

As one recent example, a plan to build a greyhound racing track at QEII Park in Christchurch had to be shelved in September after public outcry. The Board Chairman stated: *"We all felt the greyhound racing industry was going to be under greater public scrutiny in coming years."* (Cosgrove, 2021).

It has to be kept in mind that this is an entertainment industry. While GRNZ may portray the dogs as 'athletes' and greyhound racing as an 'elite sport', the truth is that greyhound racing is primarily a gambling activity.

In addition to animal welfare concerns, there are harms to people from greyhound racing. The TAB has stated that "a small minority" of its customers "suffer some degree of harm" (McConnell, 2021). In contrast, a comprehensive survey found that 1 in 5 New Zealand adults will be affected at some time in their lives by their own gambling or the gambling of others (Thimasarn-Anwar et al., 2018). The Department of Internal Affairs and the Ministry of Health state that up to 30 percent of people



involved in regular, higher risk gambling - including betting on dog races - have a gambling problem (DIA & MOH, 2008).

There are many other options for entertainment and gambling that do not involve harm to animals and present a lower risk to people.

Protecting dog welfare in the event of the closure of the industry

SPCA recognises that the industry has been given time to respond to the Robertson Report, and that the Select Committee may prefer to wait until this notice period is complete.

In the event that the industry is closed, we also recognise that it will take some time to wind down the industry - people depend on it for their income. There will be practical and logistical barriers to overcome.

SPCA's main concern would be for the welfare of racing greyhounds during any wind-down period. Our organisation understands that the existing rehoming agencies can currently rehome several hundred greyhounds per year. There are approximately 3,000 racing greyhounds in New Zealand with approximately 700 new registrations per year (Department of Internal Affairs, 2019). It is SPCA's understanding that more puppies were bred in the 2020/2021 season than the previous four.

SPCA is willing to work with GRNZ, other animal rescues, existing rehoming organisations and greyhound trainers to help rehome greyhounds, in the event that trainers cannot keep all of their dogs. Ex-racing greyhounds sometimes have significant health and behaviour problems that need to be addressed before rehoming, and so it will be important to ensure that skilled organisations are involved.

SPCA urges for planning to begin so that the potential closure of the industry can be implemented in a manner that protects people and animals.

We note that during the closure of the industry in New South Wales, a taskforce was set up to develop a phased shutdown plan. The taskforce was led by the NSW Department of Justice and included representatives from the Department of Primary Industries, Treasury, the Office of Local Government and RSPCA NSW (NSW Department of Justice, 2017).



We ask that GRNZ and the relevant government agency explore the development of a transition plan that describes how trainers and their dogs could be assisted to exit the industry from the beginning of 2023.

Conclusion

SPCA appreciates the opportunity to comment on the Petition of Aaron Cross for the Greyhound Protection League of New Zealand. We would welcome further engagement on this issue, including via meeting with the Committee or by providing further information.



References

- Beehive Press Release. (2017). *Racing Minister says Hansen report findings are disturbing*. <https://www.beehive.govt.nz/release/racing-minister-says-hansen-report-findings-are-disturbing>
- Beehive Press Release. (2021). *Greyhound racing industry formally on notice*. <https://www.beehive.govt.nz/release/greyhound-racing-industry-formally-notice>
- Cosgrove, J. (2021). Plan to build greyhound racing track at QEII Park rejected after public outcry. *Otago Daily Times*. <https://www.odt.co.nz/star-news/star-sport/star-racing/plan-build-greyhound-racing-track-qeii-park-rejected-after-public>
- Department of Internal Affairs. (2019). *Impact Summary: Classification of racing greyhounds as working dogs under the Dog Control Act 1996*. [https://www.dia.govt.nz/diawebsite.nsf/Files/Racing-Industry-Bill/\\$file/Regulatory-Impact-Statement-Classification-of-Greyhounds.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Racing-Industry-Bill/$file/Regulatory-Impact-Statement-Classification-of-Greyhounds.pdf)
- DIA & MOH. (2008). *Problem Gambling in New Zealand - A Brief Summary*. [https://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/\\$file/ProblemGamblingFactsFinal.pdf](https://www.dia.govt.nz/pubforms.nsf/URL/ProblemGamblingFactsFinal.pdf/$file/ProblemGamblingFactsFinal.pdf)
- Government Administration Select Committee. (2013). *Petition 2011/49 of Aaron Cross on behalf of the Greyhound Protection League of New Zealand*. https://www.parliament.nz/resource/en-NZ/50DBSCH_SCR6014_1/086d0cea38b7fbef32316ffa5c1bd34a7ecfb0f4
- Hurley, E. (2018). Top trainer fined after five greyhounds die during Cook Strait ferry crossing. *Newshub*. <https://www.newshub.co.nz/home/new-zealand/2018/09/top-trainer-fined-after-five-greyhounds-die-during-cook-strait-ferry-crossing.html>
- Judicial Control Authority. (2019). *Non Raceday Enquiry RIU v. J McCook - Penalty Decision Dated 29 February 2019*. <http://www.jca.org.nz/non-race-day-hearings/non-raceday-inquiry-riu-v-j-mccook-penalty-decision-dated-27-february-2019-chair-mr-r-mckenzie>
- Kerr-Lazenby, M. (2021). Calls for closure of Whanganui Greyhound Track after five dogs killed. *Stuff*. <https://www.stuff.co.nz/national/300202239/calls-for-closure-of-whanganui-greyhound-track-after-five-dogs-killed>
- McConnell, G. (2021). Common sense dictates greyhound racing and pokie machines must be scrapped. *Stuff*. <https://www.stuff.co.nz/sport/opinion/300214956/common-sense-dictates-greyhound-racing-and-pokie-machines-must-be-scrapped>
- Ministry for Primary Industries. (2013). *Animal welfare matters*. <https://www.mpi.govt.nz/dmsdocument/3963-Animal-Welfare-Matters-New-Zealand-Animal-Welfare-Strategy>
- Ministry for Primary Industries. (2018). *Framework for action on animal welfare in New Zealand*. <https://www.mpi.govt.nz/dmsdocument/29603/direct>
- Morrah, M. (2022). Racing regulator issued up to 300 warnings to greyhound trainers over health and



welfare failures in under a year. *Newshub*. <https://www.newshub.co.nz/home/new-zealand/2022/05/racing-regulator-issued-up-to-300-warnings-to-greyhound-trainers-over-health-and-welfare-failures-in-under-a-year.html>

New Zealand Animal Law Association. (2021). *Submission on the 2021 Review into Greyhound Racing*. <https://nzala.org/w/wp-content/uploads/2021/07/nzala-greyhound-racing-submission.pdf>

NSW Department of Justice. (2017). *Transition to Closure of the NSW Greyhound Racing Industry*. <https://cdn.newsnw.io/iKQx4aiD4Q7fvCgDvFeGgz/5e268024-516b-40c1-8adc-244295d98b67.pdf>

Reid, N. (2013). Greyhound racing deaths being “covered up.” *Stuff*. <http://www.stuff.co.nz/sport/racing/8283609/Greyhound-racing-deaths-being-covered-up>

RNZ. (2016). *11-year ban for greyhound doping bid*. <https://www.rnz.co.nz/news/national/301781/11-year-ban-for-greyhound-doping-bid>

RNZ. (2018). *Greyhound meth scandal: “simply shocking.”* <https://www.rnz.co.nz/news/national/356453/greyhound-meth-scandal-simply-shocking>

RNZ. (2021). *Greyhound trainer disqualified, fined after dog tests positive for meth*. <https://www.nzherald.co.nz/sport/greyhound-trainer-disqualified-fined-after-dog-tests-positive-for-meth/A7KCMROP7CMQ4N6J3R75NXHCU/>

Tan, L. (2018). NZ greyhound racing industry “killing a dog a day for gambling profits.” *NZ Herald*. <https://www.nzherald.co.nz/nz/nz-greyhound-racing-industry-killing-a-dog-a-day-for-gambling-profits/B6FOB4MZWIE7P3442HTROLDHWA/>

Thimasarn-Anwar, T., Squire, H., Trowland, H., & Martin, G. (2018). *Gambling report – Results from the 2016 Health and Lifestyles Survey* (Issue February).